



# **Tailoring Hazardous Materials Management Program Plans for Domestic and Foreign Contracts**

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# Outline

**What are Hazardous Materials Management Program Plans (HMMPP)**

**Domestic/Foreign Customer considerations**

**Tailoring HMMPPs to address customer and specific regulatory concerns (Foreign Military Sales vs. Direct Commercial Sale Contracts)**

# What are HMMPP's?

- ❖ A detailed, documented plan that outlines the means by which a program will execute a successful hazardous materials management strategy throughout its lifecycle
- ❖ An agreement between the contractor and the customer on HAZMAT approach: evaluation, analysis, and reporting expectations/requirements
- ❖ Plans Written IAW Applicable Standards:
  - ❖ MIL-STD-882E Task 108
  - ❖ DI-MGMT-81398C (Data Item Description for HMMPPS)
  - ❖ NAS411/NAS411-1
- ❖ Not to be confused with the Hazardous Materials Management Program Report



# US HAZMAT DIDs/Standards

- MIL-STD-882E, Task 108
- DI-MGMT-81398C
- NAS411/NAS411-1

# MIL-STD-882E, Task 108: HMMP

- Minimum Requirements:
  - Process to properly identify, analysis and control HAZMAT risks to protect human health, safety and the environment, as well as to support end user needs
  - Procedures for tracking and reporting HAZMATs
    - HAZMAT Identification (any item or substance that could cause harm due to its chemical, physical, toxicological, or biological nature)
    - HAZMAT categorization (Prohibited, Restricted, Tracked)
    - Data Tracking-HAZMAT name, category, location, quantity, etc.

# Data Item Description DI-MGMT-81398C: Hazardous Materials Management Program (HMMP) Plan

- Specifies the format, content, and intended use information for the HMMPP in alignment with NAS 411
- Establishes a program's objectives, roles, responsibilities, relationships, and procedures needed to accomplish HAZMAT management and tracking

# National Aerospace Standard 411 (NAS) 411/411-1

- A standard created by the Aerospace Industries Associations (AIA) to manage HAZMAT used in Products and Services that is consistent with the performance requirements of MIL-STD-882E, Task 108
- NAS411-1 is the Hazardous Materials Target List (HTML) that provides comprehensive lists of substances in the Prohibited, Restricted, and Tracked Categories as opposed to general definitions outlined in MIL-STD-882E
- Can be tailored to meet contractor and customer needs/requirements

# Defining Foreign Military Sales (FMS) and Direct Commercial Sales (DCS)

- FMS = Foreign Military Sale
  - Hardware is sold off to the US Government. The US government subsequently sells the hardware to a foreign customer
- DCS = Direct Commercial Sale
  - Hardware is sold directly to the customer



# FMS Contracts

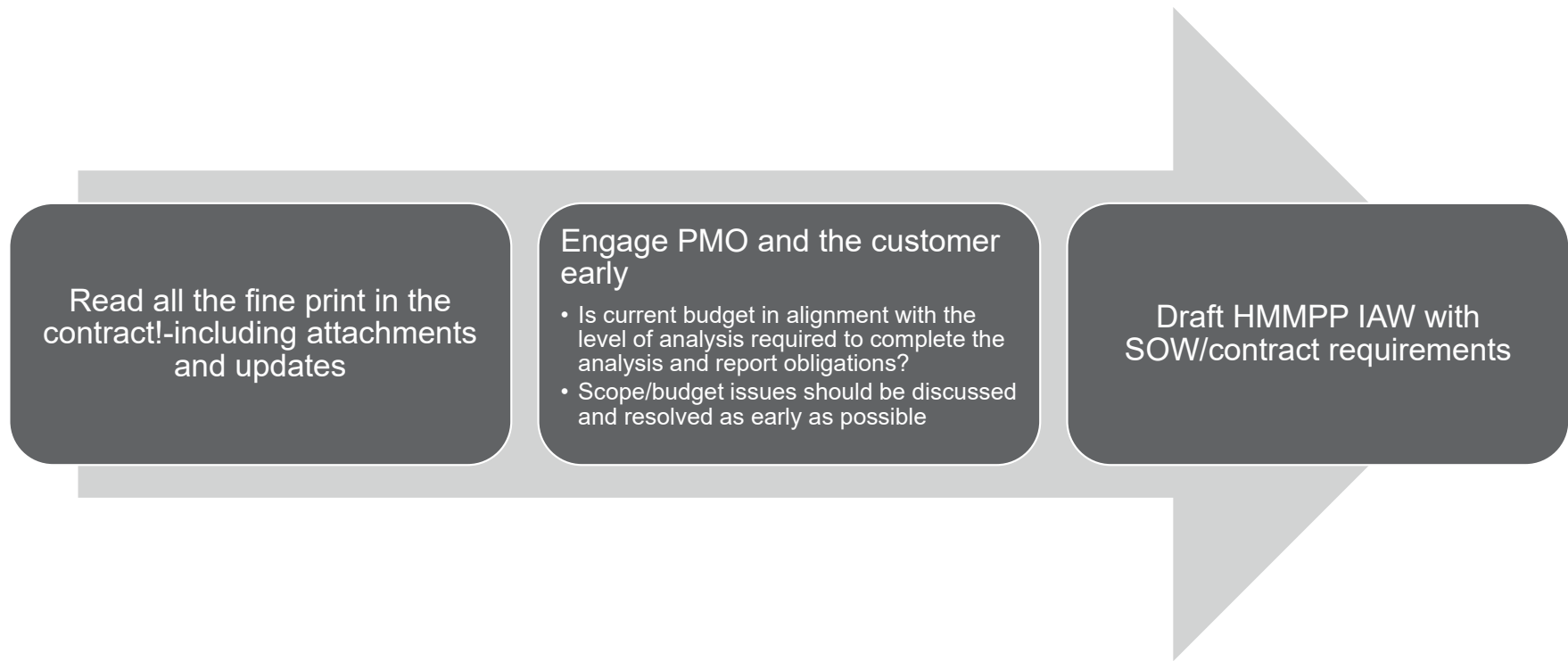
- Vast majority of customers specify NAS411/NAS411-1 in Statement of Work (SOW) and contracts
- Variations likely due to differences between the armed forces (Navy specifying NAVSEA, for example)
- Will likely not include content regarding any non-US HAZMAT reporting obligations (such as REACH)

# DCS Contracts

- Selling off hardware directly to host country
- Nuances can be much more complicated due to a wide variety of potential circumstances
- Potential EU REACH/RoHS/other host country considerations
- Use of MIL-STD-882E/NAS411 may not be specified and/or understood by end user

Hazmat Reporting Obligations are very different for DCS Contracts than with FMS Contracts

# DCS: First Steps





## DCS: Next Steps

- Present approach to customer via a working group meeting. Agreement could take multiple meetings to accomplish.
- Provide examples of hazardous materials analysis
- Provide example of consumables chemical analyses
- Present questions to customer

# Example: Proposed Tailoring to Foreign Customer



Microsoft Excel  
Worksheet

- Review Items to consider: Embedded hardware HAZMATS, soft consumables, chemicals used for assembly, maintenance, and operation of system
- Country-specific laws and regulations
- Exposure pathway analysis-expectations of customer and host country?
- Provide examples of reports that can be generated for them using existing company tools and processes for discussion during negotiations and interchange meetings

# Example: Proposed Consumable Chemical Reporting

Chemical/ Material or Trade Name	Life Cycle Use	NAS411-1 Control Category and Level	Right to Know	ODS/ODC I or II	Carcinogen to Humans or Carcinogens Present %	Extremely Hazardous Substance %	Hexavalent Chromium	Subpart Z, 13 Carcinogen, Air (A), and/or Toxic (T) Substance	Special Material Content Code (SMCC) (if applicable)	Quantity	Hazard Group			PPE Index	Classification, Labelling and Packaging	TSCA Inventory & 12b	EU Inventory of Existing Chemical Substance %	EU Listed Notified Chemical Substance %	REACH	tcmls ID # & Applicable Raytheon SDS (MSDS) Reference #	Applicable Transport Data (if known)			
											B	R	Y								CLASS	UN ID	Group	Shipping Name (if known)
Alcohol, Isopropyl, TT-I-735 Grade 3, Active	Maintenance	Tracked	Y	N	IARC 3	N	N	100% A & T	F	AR	1	3	0	H	GHS02 GHS07 GHS08	Y/12b No	Y 100%	N	N	343530 7614	3	1219	II	FLAMMABLE LIQUID
Bonded Lubricate Spray, (Lubri-Bond 220 Aerosol) MIL-L-23398 Type II, Active, (NATO S-749)	Maintenance	Restricted 2	Y	N	IARC 2B, 3	N	N	30% A & T	B	AR	2	4	1	G <sup>A</sup>	GHS02 GHS04 GHS07 GHS08	Y/12b No	Y 93%	N	Yes SVHC 2.5%	140839 100675	2.1	1950	-	AEROSOL, FLAMMABLE
Fire resistant hydraulic fluid, MIL-H-83282 / revised to MIL-PRF-83282D	Maintenance	Restricted 3	Y	N	IARC 3	N	N	A & T	-	AR	-	-	-	B	GHS09	Y/12b Yes	Y 2.4%	N	N	156241 8096	-	-	-	-

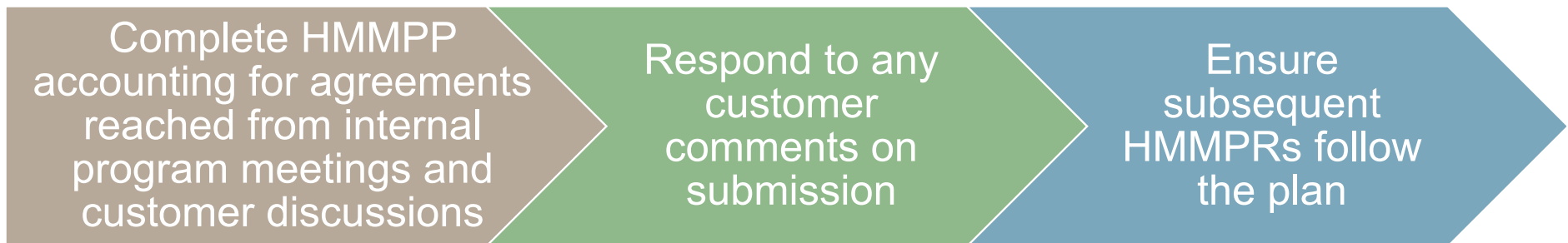


# DCS HMMPP Challenges

- Host country hazmat regulations: REACH, RoHS, others
- Budgetary/scope issues
- Level of analysis requiring multi-discipline inputs
- Required submissions not done before at company

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# Submitting HMMPP to DCS Customer





# Thank you