



# Chemical Substance Reporting for Defense Systems



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# Agenda

- Need for chemical reporting development for defense hardware systems
  - "Materials/substances declaration"
- Materials/Substances declaration development aerospace and defence industry
- Defense product materials/substances declaration and chemical risk management.



# **Burning Platform**

- The chemical composition of military system hardware products is mostly unknown
- Lack of insight has multiple impacts
  - Many lifecycle environmental, safety and occupational health (ESOH) risks are unknown to system owners
  - Product lifecycle management decisions are made difficult
  - Elevates ownership management costs
- Product-related composition information must come from within an extensive and international supply chain.

# **Materials/Substance Declaration**

- Process to obtain product-related chemical information
- Suppliers provide information to their customers
  - Information is "rolled up" through the supply chain levels
- Standardized
  - Specific data elements, formats, etc.
- Several existing industry standards
  - IPC-1752 electronics
  - IEC 62474 electronics
  - IMDS automotive

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# How Are Chemicals Introduced in the Product Supply Chain? Raytheon



Key points...

- What happens in the supply chain can have an effect on the final product composition
  - At each level, chemicals are added (or subtracted)
- Information is passed down the supply chain to determine product composition
- Formulators/ chemical distributors provide safety data sheets
  - May not be sufficient for estimating article content

# Materials Declaration for Aerospace and Defense Raytheon

- Process under development collaboratively by IAEG<sup>®</sup> and IPC<sub>®</sub>
  - IAEG<sup>®</sup> International Aerospace Environmental Group (www.iaeg.com)
  - IPC ® Association Connecting the Electronics Industry (www.ipc.org)
- Two types of product chemical data reported
  - Product chemical content information
  - Chemicals used to make/required to support products
- Aerospace and defense (AD) companies use acquired data to:
  - Identify and comply with product compliance requirements regulatory/ contractual
  - Identify dependence/materials obsolescence risks in the supply chain
  - Identify product-related ESOH risks
  - Meet customer data reporting requirements



# **Declaration Data Elements**

- Supplier/requestor identification
- Part/product information
  - Identifications
  - Weights
- Substance information
  - Substance identities
  - Substance product weight indicators
- Substance use information
- Declaration quality control information





# **Industry Declaration Process Overview**



- Data reporting elements
- Entry/ transfer instructions
- Training

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# Materials/Substances Declaration "Components"

- Declarable Substances List ("DSL")
- Data elements for materials declaration
- Data conversion to electronic format
- Guidance, instructions, technical support and training
- Data management system

### Aerospace and Defence Declarable Substances List

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- "AD-DSL"
  - DSL for the international aerospace and defense industry
  - Product-related substances, subject to regulatory, or other requirements (e.g., reporting and/or restrictions)
  - Substances in use in the industry, or in its supply chain
  - Substances used in product development and product lifecycle management
  - Forward-looking "what is, and what is likely to be subject to requirements..."



#### AD-DSL Excerpt

CAS Registry Number*	EC Number	Substance Name	First Added	Latest Revision
101-14-4	202-918-9	2,2'-dichloro-4,4'-methylenedianiline;	3/17/2015	
		4,4"-methylene bis(2-chloroaniline)		
101-77-9	202-974-4	4,4'-diaminodiphenylmethane;	3/17/2015	
		4,4"-methylenedianiline		
10588-01-9	234-190-3	Sodium dichromate	3/17/2015	
106-94-5	203-445-0	1-bromopropane;	3/17/2015	
		n-Propyl bromide		
107-06-2	203-458-1	1,2-dichloroethane;	3/17/2015	
		Ethylene dichloride		
11103-86-9	234-329-8	Potassium hydroxyoctaoxodizincatedichromate	3/17/2015	
111-96-6	203-924-4	Bis(2-methoxyethyl) ether	3/17/2015	
115-25-3		Octafluorocyclobutane	3/17/2015	
115-29-7	204-079-4	Endosulfan	3/17/2015	
115-96-8	204-118-5	Tris(2-chloroethyl)phosphate	3/17/2015	
1163-19-5	214-604-9	2,2,3,3,4,4,5,5,6,6-Decabromodiphenyl ether	3/17/2015	
117-81-7	204-211-0	Bis(2-ethylhexyl) phthalate;	3/17/2015	
		Di-(2-ethylhexyl) phthalate;		
118-74-1	204-273-9	Hexachlorobenzene	3/17/2015	
121-14-2	204-450-0	2,4-Dinitrotoluene	3/17/2015	
123-91-1	204-661-8	1,4-Dioxane	3/17/2015	
124-73-2	204-711-9	Dibromotetrafluoroethane	3/17/2015	
12656-85-8	235-759-9	Lead chromate molybdate sulfate red;	3/17/2015	
		C.I. Pigment Red 104; C.I. 77605		
12674-11-2		PCB Aroclor 1016	3/17/2015	
127564-83-4		Dichlorotetrafluoronronane	3/17/2015	

#### Current – Version 2, August 2017

# **National Aerospace Standard 411-1**

- NAS411-1, Hazardous Material Target List
  - Aerospace Industries Association (AIA; www.aia-aerospace.org) standard
  - DSL for US military acquisition systems
  - Reportable hazardous substances under US military Hazardous Materials Management Programs (HMMPs)
  - Product-related substances regulated and/or posing operational risks
  - Defense system product content or used in maintenance & repair
  - Current Revision 1: Oct 2016





# **DSL Relationship: AD-DSL and HMTL**



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# MIL-STD 882E

- US Department of Defense approach for identifying hazards and assessing and mitigating associated risks encountered in the development, test, production, use, and disposal of defense system products (military hardware)
  - Consists of environmental safety and occupational health (ESOH) risk management
  - Typically started during system development
- Contains numerous ESOH-related tasks
  - Task 108 Hazardous Material Management Plan

- Requires identifying, reporting of hazardous materials (substances) used in developed defense systems
  - NAS411-1 = reportable substances
  - Other substances can be added
  - Includes substances in hardware and those needed for system operations or support (e.g., in maintenance or repair)
- Imposes use permission requirements for some high-risk substances (e.g., hex chrome)

# Materials/Substances Declaration Supports ESOH Risk Assessment and Reporting



### **Current Status**

- NAS411-1 becoming integrated as the standard DSL for US defense acquisition materials/substances declaration
- AD industry declaration process (using the AD-DSL) is under development and is expected in 2018



## **Next Steps**

- Develop aerospace and defense industry materials declaration process
  - Deploy in the industry supply chain
- Use declaration process to obtain defense system materials/substance information from supply chain
- Use declaration information to better identify defense system-related ESOH risks
- Support the re-use of system information within the customer community.



# Thank you!

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