Guidance Document

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Hazard Communication for Spray Polyurethane Foam Insulation Applications

OSHA Standard 29 CFR 1910.1200
OSHA Standard 29 CFR 1926

Overview

The Standard was designed to provide employees with information on:

- The hazards and identities of all chemicals used in the workplace.
- Protective measures against adverse effects from use and handling including potential exposure.

Employers

- Do you have a written Hazard Communication Program?
- Do you have a list of all chemicals in the workplace and their potential hazards?
- Are all Material Safety Data Sheets (MSDSs) readily accessible to every employee?
  - Do you have MSDSs in a language that all employees can read and understand?
- Have your employees been trained on:
  - Reading labels?
  - Reading and understanding an MSDS?
  - How to obtain and use hazard information?
  - Appropriate work procedures?
  - Emergency procedures?
  - Proper personal protective equipment for each job?
- Do you have a medical surveillance program for employees if hazardous chemicals are being used (such as respiratory and skin sensitizers)?

Our Standard

The OSHA Standard requires employers to develop a written HAZARD COMMUNICATION program, which must include:

- A list of all hazardous materials used in the work place. This list needs to be reviewed annually and updated as new materials enter the workplace.
- The procedures used to collect and maintain an MSDS for each chemical used in the workplace. The MSDSs must be readily available to the employees at each worksite.
- A description of the labeling system used for chemical containers.
- The procedures used to ensure that all containers are properly labeled.
- The methods of training and providing hazardous material information to employees.
- Procedures for safely conducting non-standard work practices.
- Procedures for ensuring contractors and other non-employees are informed of the hazardous materials in the workplace.

Training

Here are some key points to cover in training:

- Requirements of the OSHA standard.
- Information on any operation in the area where hazardous materials are present.
- Procedures for identifying hazardous materials.
- Safe handling procedures, including:
  - personal protective equipment to be used;
  - appropriate work practices;
  - non-routine tasks; and
  - emergency procedures.
- Storage procedures.
- Use of labels and MSDSs.
- Employee access to MSDS files.
- How to interpret MSDS information.
- Your written hazard communication policy.
- Communication with contractors.

If respirators are required, as with spray polyurethane foam applications, a detailed written Respirator Program is required.

This program should include:

- Appropriate respirator identified for each job performed at the work site such as:
- Supplied-air respirator (full face, hood, or helmet)
- Air-purifying respirator, etc.
- Medical exam
- Respirator fit test

Sources of Additional Information

OHSA website:
www.osha.gov/SLTC/hazardcommunications/index.html

NIOSH website:
www.cdc.gov/niosh/homepage.html

NIOSH Pocket Guide:
www.cdc.gov/niosh/npg/

International Chemical Safety Cards:
www.cdc.gov/niosh/ipcs/nicstart.html

National Fire Protection Association:
www.nfpa.org

For more information, visit:

The American Chemistry Council's Center for the Polyurethanes Industry
www.americanchemistry.com/polyurethane or
www.spraypolyurethane.com

Spray Polyurethane Foam Alliance
www.sprayfoam.org

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