

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.



Guidance Document

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

OSHA 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

Published August, 2009. This document may be updated. For the most current version of this document, see www.americanchemistry.com/polyurethane, www.spraypolyurethane.com, or www.sprayfoam.org.

This document was prepared by the American Chemistry Council (ACC) Center for the Polyurethanes Industry (CPI) and the Spray Polyurethane Foam Alliance (SPFA). It is intended to provide general information to persons who may handle or apply spray polyurethane foam chemicals. It is not intended to serve as a substitute for in-depth training or specific handling or application requirements, nor is it designed or intended to define or create legal rights or obligations. It is not intended to be a "how-to" manual, nor is it a prescriptive guide. All persons involved in handling and applying spray polyurethane foam chemicals have an independent obligation to ascertain that their actions are in compliance with current federal, state and local laws and regulations and should consult with their employer concerning such matters. Any mention of specific products in this document is for illustration purposes only and is not intended as a recommendation or endorsement of such products.

Neither ACC, CPI, SPFA, nor any of their member companies, nor any of their respective directors, officers, employees, subcontractors, consultants, or other assigns, makes any warranty or representation, either express or implied, with respect to the accuracy or completeness of the information contained in this document; nor do the ACC, CPI, SPFA, nor any member companies assume any liability or responsibility for any use or misuse, or the results of such use or misuse, of any information, procedure, conclusion, opinion, product, or process described in this document. NO WARRANTIES ARE GIVEN; ALL IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE ARE EXPRESSLY EXCLUDED.

This work is protected by copyright. Users are granted a nonexclusive royalty-free license to reproduce and distribute this document, subject to the following limitations: (1) the work must be reproduced in its entirety, without alterations; and (2) copies of the work may not be sold.

