

General Hazard Communication Guidance for Spray Polyurethane Foam (SPF) Insulation Applications

OSHA Standard 29 CFR 1910.1200 *et seq.*

OSHA Standard 29 CFR 1926 *et seq.*

Overview

As stated in 29 CFR 1910.1200, the Occupational Safety and Health Administration (OSHA) Hazard Communication 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.

The OSHA Hazard Communication Standard was updated to conform to the United Nations Globally Harmonized System (GHS) for Classification and Labeling of Chemicals. The Final Rule was published to the Federal Registry on March 26, 2012 and became effective May 25, 2012. A copy of the final rule in its entirety can be found on OSHA's website at <http://www.osha.gov/dsg/hazcom/ghs-final-rule.html>.

According to the OSHA Hazard Communications Standard, all employers are required to have a written hazard communications program to meet the requirements addressed in 29 CFR 1910.1200. Violations related to the Hazard Communications Standard are some of the most frequently cited by OSHA compliance officers during inspections. Requirements of the standard include development of a written program to address important components, including but not limited to the following: labels and other forms of warning, safety data sheets (SDSs), and employee training and information.

Some questions for employers to consider include:

- ✓ 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 SDSs readily accessible to every employee?
- ✓ Do you have SDSs in a language that all employees can read and understand?

- ✓ Have your employees been trained on:
 - ✓ Reading labels?
 - ✓ Reading and understanding an SDS?
 - ✓ How to obtain and use hazard information?
 - ✓ Appropriate work procedures?
 - ✓ Emergency procedures?
 - ✓ Proper personal protective equipment (PPE) for each job?
- ✓ Do you have a medical surveillance program for employees if hazardous chemicals are being used (such as respiratory and skin sensitizers)?

Hazard Communication Program

OSHA requires employers, pursuant to 29 CFR 1910.1200, 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 hazards are introduced into the workplace.
- The procedures used to collect and maintain an SDS for each chemical used in the workplace. The SDSs 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 used to train and provide hazardous material information to employees.
- The procedures for safely conducting non-standard work practices.
- The procedures for ensuring contractors and other non-employees are informed of the hazardous materials in the workplace.

Training

As a component of the OSHA Hazard Communication Standard, employees must provide Hazard Communication training upon initial assignment. The training has to include information on the hazardous chemicals the employees are working with, the control

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measures to reduce the potential for exposure, and how to read the SDS and product labels. The training must also include worksite-specific information including work practices, PPE to be used, and emergency procedures. OSHA requires that the employee have the opportunity to ask questions and be able to demonstrate comprehension.

The training must be understandable for the employee. When employees receive work instructions in languages other than English, employers are required to provide training in that language as well.

Here are some key points to cover in training:

- Requirements of the OSHA Hazard Communication Standard.
- Information on any operation in the area where hazardous materials are present.
- Procedures for identifying hazardous materials.
- Safe handling procedures, including:
 - PPE to be used;
 - appropriate work practices;
 - non-routine tasks; and
 - emergency procedures.
- Storage procedures.
- Use of labels and SDSs.
- Employee access to SDS files.
- How to interpret SDS information.
- Your company's written hazard communication policy.

Additional training is needed when a new physical or health hazard is introduced into the work area. At multi-employer worksites, multiple training sessions may be needed so that

all employees know where the SDSs are located, details related to the labeling systems, and the hazards associated with other chemicals at the worksite they may be exposed to.

Sources of Additional Information:

OSHA website:

<http://www.osha.gov/dsg/hazcom/index2.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

The American Chemistry Council's Center for the Polyurethanes Industry

<http://www.polyurethane.org/> or
www.spraypolyurethane.com

Spray Polyurethane Foam Alliance

www.sprayfoam.org

If respirators are required, as with SPF applications, a detailed written Respirator Program is required by OSHA pursuant to 29 CFR 1910.134. This Program should include:

- Information on the appropriate respirator identified for each job performed at the worksite such as:
 - Supplied-air respirator (full face, hood, or helmet)
 - Air-purifying respirator, etc.
- Medical exam for each employee
- Respirator fit test for each employee

For additional information refer to CPI's [Guidance for Developing a Respiratory Protection Program](#), available at www.spraypolyurethane.com.

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