

VOSH PROGRAM DIRECTIVE: 14-415

ISSUED: 15 December 2013

SUBJECT: National Emphasis Program – Occupational Exposure to Isocyanates

Purpose

This directive describes policies and procedures for VOSH personnel for implementing a National Emphasis Program to identify and reduce or eliminate the incidence of adverse health effects associated with occupational exposure to isocyanates.

This Program Directive is an internal guideline, not a statutory or regulatory rule, and is intended to provide instructions to VOSH personnel regarding internal operation of the Virginia Occupational Safety and Health Program and is solely for the benefit of the program. This document is not subject to the Virginia Register Act or the Administrative Process Act; it does not have general application and is not being enforced as having the force of law.

Scope

This directive applies VOSH-wide, and specifically to Occupational Health Compliance and Consultation Services personnel.

Reference

OSHA Instruction CPL 03-00-017 (20 June 2013)

Cancellation

VOSH Program Directive 14-412 (01 November 2005)

Effective Date

15 October 2013

Action

Directors and Managers shall ensure that VOSH personnel understand and enforce the requirements of this directive.

Expiration Date

Not Applicable.

William F. Burge
Acting Commissioner

Distribution: Commissioner of Labor and Industry
Assistant Commissioner
VOSH Directors and Managers
Legal Support & IMIS Support Staffs

Cooperative Programs Manager
VOSH Compliance & Cooperative Programs Staff
OSHA Region III & Norfolk Area Offices

When the guidelines, as set forth in this Program Directive, are applied to the Department of Labor and Industry and/or to Virginia employers, the following federal terms if, and where they are used, shall be considered to read as below:

Federal Terms

VOSH Equivalent

OSHA

VOSH

Federal Agency

State Agency

Agency

Department

Regional Administrator

Assistant Commissioner

Area Director

Regional Director
VOSH Program Director

Area Office/Regional Office

Regional Office

Regional Solicitor

Attorney General or VOSH
Division of Legal Support (DLS)

Office of Statistics

VOSH Research and Analysis

29 CFR

VOSH Standard

Compliance Safety and Health Officer (CSHO)
and/or Industrial Hygienist

CSHO

OSHA Field Operations Manual (FOM)

VOSH Field Operation Manual (FOM)

OSHA Directives:

VOSH Program Directives:

CPL 02-00-150, Field Operations
Manual (FOM) (4/22/11)

VOSH PD 02-001G, VOSH Field Operations
Manual (FOM) (10/1/13)

CPL 02-00-025 (CPL 2.25I), Scheduling
System for Programmed Inspections (1/4/95)

VOSH 02-051A, Scheduling System for
Programmed General Inspections (2/22/90)

CPL 02-00-051I (CPL 2.0.51J), Enforcement Exemption
and Limitations under the Appropriations Act (5/28/98)

VOSH PD 02-003M, VOSH Procedures to comply
with OSHA Enforcement Exemptions and
Limitations under the Federal Appropriations
Act... (6/1/13)

CPL 02-00-135, Recordkeeping Policies and Procedures
Manual (12/30/04)

VOSH 09-104, Recordkeeping Policies and
Procedures Manual (RKM) (8/1/12)

TED 01-00-015, OSHA Technical Manual (1/20/99)
(8/1/12)

CPL 02-02-120 (CPL 2-0.120), Inspection Procedures
for the Respiratory Protection Standard (9/25/88)

CPL 02-02-038 (CPL 2-2.38D), Inspection Procedures
for the Hazard communication Standard (3/20/98)

CPL 02-01-050, 29 CFR Part 1910, Subpart I, Enforcement
Guidance for Personal Protective Equipment in General
Industry (2/10/11)

CPL 02-00-141, Inspection Scheduling for Construction
(1/14/06)

CPL 02-02-072, Rules of Agency Practice and Procedure
Concerning OSHA Access to Employee Medical Records
(8/22/07)

CPL 02-02-070, Inspection Procedures for Occupational
Exposure to Methylene Chloride Final Rule 29 CFR Part
1910.1052, 29 CFR Part 1915.1052 and 29 CFR Part
1926.1152 (12/14/01)

VOSH PD 09-052, OSHA Technical Manual

VOSH PD 02-411, Inspection Procedures for the
Respiratory Protection Standard, 1910.134
(12/15/98)

VOSH PD 02-060A, Inspection Procedures for
the Hazard Communication Standard (9/15/98)

VOSH PD 02-243A, Part 1910, Subpart I,
Enforcement Guidance for Personal Protective
Equipment in General Industry (1/15/12)

VOSH PD 02-105, Inspection Scheduling for
Construction (7/1/07)

VOSH PD 02-022A, Rules of Agency Practice and
Procedure Concerning OSHA Access to Employee
Medical Records (11/1/09)

VOSH PD 02-415, Inspection Procedures for
Occupational Exposure to Methylene Chloride,
Final Rule, 1910.1052, 1925.1052 and 1926.1152
(2/1/02)



OSHA INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: CPL 03-00-017

EFFECTIVE DATE: June 20, 2013

SUBJECT: National Emphasis Program – Occupational Exposure to Isocyanates

ABSTRACT

- Purpose:** This instruction describes policies and procedures for implementing a National Emphasis Program to identify and reduce or eliminate the incidence of adverse health effects associated with occupational exposure to isocyanates.
- Scope:** This instruction applies OSHA-wide.
- References:** OSHA Instruction CPL 02-00-150, [Field Operations Manual \(FOM\)](#), April 22, 2011;
OSHA Notice 13-01 (CPL 02), [Site-Specific Targeting 2012 \(SST-12\)](#), January 4, 2013.
- Cancellations:** This instruction supersedes all Regional and Local Emphasis Programs specifically dealing with isocyanates.
- State Impact:** Notice of intent and adoption required. See Section VII.
- Action Offices:** OSHA National, Regional and Area Offices, State Plan and State Consultation Offices.
- Originating Office:** Office of Health Enforcement.

Contact: Directorate of Enforcement Programs
Office of Health Enforcement
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By and Under the Authority of

David Michaels, PhD, MPH
Assistant Secretary

Executive Summary

This National Emphasis Program (NEP) was developed to focus OSHA resources on the workplace health issue of occupational exposure to isocyanates. This instruction combines enforcement and outreach efforts to raise awareness of employers, workers, and safety and health professionals of the serious health effects associated with occupational exposure to isocyanates. The health effects of occupational exposure to isocyanates include occupational asthma, irritation of the skin (dermatitis) and mucous membranes (eyes, nose, and throat), hypersensitivity pneumonitis, and chest tightness. Isocyanates include compounds also classified as potential human carcinogens and known to cause cancer in animals. Workers in a wide range of industries and occupations are exposed to at least one of the numerous isocyanates known to be associated with work-related asthma. Occupational factors are associated with at least 15 percent of all adult onset asthma cases in the United States. Occupational asthma is an illness characterized by intermittent breathing difficulty including chest tightness, wheezing, cough and shortness of breath. It is frequently serious and sometimes fatal. Jobs that may involve exposure to isocyanates include painting, blowing foam insulation, and the manufacture and thermal degradation of many polyurethane products such as polyurethane foam, insulation materials, surface coatings, car seats, furniture, foam mattresses, under-carpet padding, packaging materials, shoes, laminated fabrics, polyurethane rubber, and adhesives. This instruction sets forth a site selection system that targets multiple industries and will focus on evaluating inhalation, dermal and other routes of occupational exposure to isocyanates. This instruction supersedes all Regional and Local Emphasis Programs specifically addressing occupational exposure to isocyanates.

Significant Changes

This instruction describes a new initiative by the Occupational Safety and Health Administration.

Table of Contents

I.	Purpose.....	1
II.	Scope	1
III.	References	1
IV.	Cancellations.....	2
V.	Expiration.....	2
VI.	Consultation Programs	2
VII.	Application.....	2
VIII.	Background.....	2
IX.	Program Procedures	4
	A. Targeting.....	4
	B. Identifying Facilities for Inspection	4
	C. Site Selection	5
	D. Inspection Scheduling	7
	E. Complaints and Referrals.....	7
	F. Cooperative Programs	8
	G. Strategic Partnerships [RESERVED]	8
	H. Expanding the Scope of the Inspection.....	8
X.	Inspection Procedures	9
	A. Opening Conference.....	9
	B. Recordkeeping.....	9
	C. Exposure Assessments.....	10
	D. Citation Guidelines	12
	E. Personal Protective Equipment (PPE).....	14
	F. Hazard Communication	15
	G. Housekeeping.....	15
	H. Flammable and Combustible Products	15
XI.	Follow-up Inspections.....	16

XII. Hazard Alert Letter (HAL) - Follow-up	16
A. HAL Follow-up	16
B. Employer’s HAL Progress	16
XIII. VOSH Integrated Management Information System (IMIS) Coding	17
XIV. Outreach	17
A. Offices	17
B. Online Materials	18
XV. Coordination	18
XVI. Program Evaluation	18
Appendix A. Industries Where Isocyanate Exposures Are Known or Likely to Occur	A-1
Appendix B. Isocyanate Sampling, Field Extraction, and Sample Shipment Procedures	B-1
Appendix C. Health Surveillance Form (Non-Mandatory) – Isocyanate Exposure	C-1
Appendix D. Sample Isocyanate Hazard Alert Letter	D-1
Appendix E. Publications and Resources	E-1
Appendix F. Sample General Duty Clause Citation Language	F-1
Appendix G. General Guidance for Employers on Personal Protective Equipment (including Respiratory Protection) for Worker Exposures to Isocyanates	G-1
Appendix H. General Guidance for Employers on Medical Surveillance Program Information for Worker Exposures to Isocyanates	H-1

I. Purpose.

This instruction describes policies and procedures for implementing a National Emphasis Program to identify and reduce or eliminate the incidence of adverse health effects associated with occupational exposure to isocyanates.

II. Scope.

This instruction applies OSHA-wide.

III. References.

- A. OSHA Instruction CPL 02-00-150, Field Operations Manual (FOM), April 22, 2011, and subsequent changes.
- B. OSHA Notice 13-01 (CPL 02), Site-Specific Targeting 2012 (SST-12), January 4, 2013.
- C. OSHA Instruction CPL 02-00-025 (CPL 2.25I), Scheduling System for Programmed Inspections, January 4, 1995.
- D. OSHA Instruction CPL 02-00-051(CPL 2-0.51J), Enforcement Exemption and Limitations under the Appropriations Act, May 28, 1998.
- E. OSHA Instruction CSP 03-02-002, OSHA Strategic Partnership Program for Worker Safety and Health, December 9, 2004.
- F. OSHA Instruction CPL 02-00-135, Recordkeeping Policies and Procedures Manual, December 30, 2004.
- G. OSHA Instruction TED 01-00-015, OSHA Technical Manual, January 20, 1999.
- H. OSHA Instruction CPL 02-00-120 (CPL 2-0.120), Inspection Procedures for the Respiratory Protection Standard, September 25, 1988.
- I. OSHA Instruction CPL 02-02-038 (CPL 2-2.38D), Inspection Procedures for the Hazard Communication Standard, March 20, 1998.
- J. OSHA Instruction CPL 02-01-050, 29 CFR Part 1910, Subpart I, Enforcement Guidance for Personal Protective Equipment in General Industry, February 10, 2011.
- K. OSHA Safety and Health Topics, OSHA Sampling and Analytical Methods.
- L. OSHA Instruction CPL 02-00-141, Inspection Scheduling for Construction, July 14, 2006.

- M. OSHA Instruction CPL 02-02-072, [Rules of agency practice and procedure concerning OSHA access to employee medical records](#), August 22, 2007.
- N. OSHA Instruction CPL 02-02-070, [Inspection Procedures for Occupational Exposure to Methylene Chloride Final Rule 29 CFR Part 1910.1052, 29 CFR Part 1915.1052 and 29 CFR Part 1926.1152](#), December 14, 2001.
- O. OSHA Instruction ADM 04-00-001, [OSHA Field Safety and Health Manual](#), May23, 2011.

IV. Cancellations.

Not Applicable.

V. Expiration.

This instruction will expire three (3) years from the issuance date.

VI. Consultation Programs.

When appropriate, consultation programs are encouraged to develop their own strategic approaches for reducing the health effects associated with occupational exposure to isocyanates covered by this NEP.

VII. Application.

This directive applies to all workplaces (General Industry, Construction, and Maritime) under VOSH's jurisdiction.

VIII. Background.

Exposures to isocyanates can have adverse health effects for workers. Organic isocyanates are chemicals which contain one or more isocyanate groups (-NCO) attached to an organic group. The general term "isocyanates" refers to all chemicals with two or more isocyanate groups such as diisocyanates or polyisocyanates. Respiratory disease among workers exposed to isocyanates has been recognized since the 1950s. Exposure limits have been established in the U.S. and other countries for both ceiling and TWA exposures. Isocyanates include compounds classified as potential human carcinogens and known to cause cancer in animals.

"The most widely used compounds are diisocyanates, which contain two isocyanate groups, and polyisocyanates, which are usually derived from diisocyanates and may contain several isocyanate groups. The most commonly used diisocyanates include methylenebis (phenyl isocyanate) (MDI), toluene diisocyanate (TDI), and hexamethylene diisocyanate (HDI). Other diisocyanates include naphthalene diisocyanate (NDI), methylene bis-cyclohexylisocyanate

(HMDI) (hydrogenated MDI), and isophorone diisocyanate (IPDI). Examples of widely used polyisocyanates include HDI biuret and HDI isocyanurate.”¹

Isocyanates are powerful irritants to the mucous membranes of the eyes, nose and throat, and gastrointestinal and respiratory tracts. Irritation may be severe enough to produce bronchitis with bronchospasm. Hypersensitivity pneumonitis (inflammation in the lungs caused by exposure to an allergen) has been reported in isocyanate-exposed workers. Symptoms can continue for months or years after exposure has ceased. Deaths have occurred due to both asthma and hypersensitivity pneumonitis from isocyanate exposure.²

Some isocyanates are also allergic sensitizers. Cross-sensitization, in which a worker is exposed to one isocyanate but reacts adversely to others as well, can occur. Studies indicate that dermal exposure is a significant cause of respiratory sensitization. Thus, workers with skin contact to isocyanates may develop sensitivity, resulting in asthma attacks with subsequent exposures. Sensitization can occur at very low levels of exposure. Dermal sensitization may also result in rash, itching, hives and swelling of the extremities. Because isocyanates are not relatively water soluble, they cannot be easily washed off skin or clothing.

Isocyanates are widely used in the manufacture of flexible and rigid foams, fibers, coatings such as paints and varnishes, and elastomers, and are increasingly used in the automobile industry, auto body repair, and building insulation materials. In addition, spray-on polyurethane products containing isocyanates have been developed for a wide range of retail, commercial, and industrial uses to protect cement, wood, fiberglass, steel, and aluminum, including protective coatings for truck beds, trailers, boats, foundations, and decks.

The National Institute for Occupational Safety and Health (NIOSH) states that “Preventing exposure to isocyanates is a critical step in eliminating the health hazard. Engineering controls such as closed systems and ventilation should be the principal method for minimizing isocyanate exposure in the workplace. Other controls, such as worker isolation and personal protective clothing and equipment may also be necessary. Early recognition of sensitization and prompt and strict elimination of exposures is essential to reduce the risk of long-term or permanent respiratory problems for workers who have become sensitized.”³

The goal of this directive is to reduce employee exposure to isocyanates shown to potentially cause work-related asthma, sensitization (respiratory, skin) and other occupational health effects. This goal will be accomplished by a combined effort of inspection targeting, outreach to employers, and compliance assistance. By performing activities (enforcement and outreach) related to this hazard, OSHA aims to raise awareness of the occurrence and severity of occupational health hazards related to or associated with isocyanates in all industry sectors.

¹ [NIOSH Safety and Health Topic: Isocyanates](#)

² <http://www.cdc.gov/niosh/docs/96-111/>

³ <http://www.cdc.gov/niosh/topics/isocyanates/>

IX. Program Procedures.

A. Targeting.

Inspections under this NEP will focus on general industry, construction and maritime industries where exposures to isocyanates are known or are likely to occur. Establishments with fewer than 10 workers shall be included in this NEP. Additionally, federal agencies that are subject to inspection and have employees exposed to hazards covered by this NEP shall be included.

B. Identifying Facilities for Inspection.

Exposures to isocyanates are found in many industries, but are not necessarily found in all establishments within those industries. OSHA reviewed extensive information to develop primary, secondary and construction targeting lists for industries with SIC/NAICS codes indicating potential isocyanates exposures.

Appendix A contains a primary list of general industry and maritime sectors (by SIC/NAICS) where overexposures to isocyanates are known to occur, and exposures have been demonstrated to be above an OSHA permissible exposure limit or an occupational exposure limit⁴ (OEL), and workers have exhibited illnesses associated with occupational exposure to isocyanates. A secondary list includes other industries where exposures to isocyanates are also known to occur but where worker overexposures to isocyanates may not have been documented. See Appendix A of this instruction for the primary and secondary lists of industries (by SIC/NAICS code).

Appendix A also contains a list of construction industries (by SIC/NAICS code) where worker exposure to isocyanates are likely to occur. Similar to those contained on the secondary list, not all establishments in the listed construction industries have documented worker overexposures to isocyanates.

If a Regional Office knows of industries not included in Appendix A that have demonstrated a pattern of isocyanate exposures, it should notify the Director of Occupational Health Compliance for possible inclusion in the Appendix. The rationale for including the industry shall be documented, and may include information such as, but not limited to:

1. A history of previous isocyanate overexposures in the industry, based on OSHA inspection histories;

⁴ An occupational exposure limit (OEL) is a non-regulatory established airborne exposure limit. An OEL includes National Institute for Occupational Safety and Health (NIOSH) Recommended Exposure Limits (RELs) and American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values[®] (TLVs[®]).

2. Local knowledge of overexposures to isocyanates based on objective illness, exposure, or public health data from sources including, but not limited to, the U.S. Environmental Protection Agency's Toxic Release Inventory (TRI), the National Institute for Occupational Safety and Health (NIOSH), or state workers' compensation records; and
3. A documented history of referrals from local agencies or healthcare providers related to this hazard.

In addition, VOSH may want to establish communication through NIOSH with states that have an occupational respiratory disease state-based surveillance program (e.g., California, Massachusetts, Michigan, New Jersey, and Texas) to identify possible industries with a history of work-related asthma from isocyanate exposure. Information on NIOSH-funded state-based Respiratory Disease Surveillance programs can be found at <http://www.cdc.gov/niosh/topics/surveillance/ords/StateBasedSurveillance/Stateprograms.html>.

VOSH in turn will notify DEA, Office of Statistical Analysis (OSA), of those industries, and DEA/OSA will include them in Appendix A when appropriate.

C. Site Selection.

1. **Master List Generation.** For general industry and maritime inspections, the DEA/OSA will prepare a master inspection list for each VOSH Regional Office using the most current employer listing for the SIC/NAICS industries on the primary list in Appendix A. If the Field or Regional Office has inspected all potential establishments found in their jurisdiction with SIC/NAICS codes on the primary list, the Regional Office may then contact DEA/OSA to generate additional establishments for inspection using the secondary list. The industries marked with an asterisk on the primary and secondary lists in Appendix A will not be included in the master list of establishments generated by DEA/OSA (because the list establishments OSHA buys does not include establishments with these SIC/NAICS codes). Each Regional Office will need to search local listings for establishments in its jurisdiction with these SIC/NAICS codes, and add any such establishments to its master list in accordance with section XII.B.2 of this instruction.

For construction inspections, when a CSHO inspects a construction site and determines that a company or operation is classified under one of the construction-related SIC/NAICS codes listed in Appendix A, the procedure in this Instruction shall be followed.

2. **Additions.** Exposures to isocyanates are found in many industries, but are not necessarily in all establishments within those industries. Regional Offices may generate their own master lists of establishments, or they may add establishments to the DEA-generated master list, based on sources that may include, but are not limited to:
 - a. The employer list (available from the DEA/OAS);
 - b. Commercial directories;
 - c. Telephone listings;
 - d. Local knowledge of establishments based on sources such as worker complaints, referrals from the local health department, or previous OSHA inspection history;
 - e. Dodge Reports for construction sites.

3. **Deletions.** Regional Offices shall delete from their target list for a current inspection cycle any facilities which they know are not likely to have isocyanate hazards or are no longer conducting business. In addition, Regional Offices shall delete any establishment that has had a comprehensive or focused health inspection that addressed isocyanate hazards, conducted within the current or previous three (3) fiscal years with no serious citations related to this NEP, or where such citation(s) were issued but either a follow-up inspection documented appropriate and effective efforts (e.g., air sampling, install engineering controls) by the employer to abate serious hazards cited or where VOSH received notice and confirmed that all cited serious hazards had been abated.

Regional Offices must maintain documentation supporting any deletions made under this paragraph.

4. **Cycle Generation.** Each establishment on the Regional Office's master list will be assigned a sequential number. The list will be randomized in accordance with *Scheduling Systems for Programmed Inspections*, VOSH PD 02-051A or its successor. The Regional Office will create inspection cycles of five (5) or more establishments. Each Regional Office must conduct at least three (3) inspections per year. Subsequent cycles will be created in the same manner until the expiration of this NEP or until all establishments on the list have been assigned to a cycle. Cycles may be created all at once or as necessary, and need not be of the same size.

Note: Whenever a Regional Office becomes aware of a previously unknown establishment in one of the identified SIC/NAICS codes, the establishment shall be added to the bottom of the list in alphabetical order, assigned a sequential number, and randomized in accordance with *Scheduling Systems for Programmed Inspections*, VOSH PD 02-051A or its successor.

D. Inspection Scheduling.

Within a specified cycle, inspections may be scheduled in any order that promotes efficient use of resources. An inspection cycle must be completed before another cycle is started, except that establishments may be carried over in accordance with VOSH PD 02-051A or its successor.

Some establishments selected for inspection under this NEP may also be selected under the current General Schedule, any Site-Specific Targeting (SST) Plan, if implemented, or other NEPs and/or Local Emphasis Programs (LEPs) which VOSH has adopted. Some of the other targeted NEPs include Amputations, Combustible Dust, Lead, Shipbuilding, and Silica. Whenever possible, inspections under this NEP should be carried out concurrently with the SST or other programmed inspections.

Construction inspections shall be scheduled from a list of construction work sites pursuant to VOSH PD 02-105 or its successor. If during the course of any construction inspection a worksite falls within any of the SIC/NAICS codes listed in Appendix A, the CSHO shall continue the inspection in accordance with the FOM and either 1) expand the scope in accordance with this NEP or 2) immediately submit a health referral to the Regional Health Director in order to focus on any activity that potentially exposes employees to isocyanates.

E. Complaints and Referrals.

1. Construction.

Appendix A of this Directive provides construction industries where workers are most likely to have exposures to isocyanates. Whenever a Regional Office receives a complaint or referral for any construction operation where the potential exists for worker exposure to isocyanates, or a CSHO observes a potential worker exposure to isocyanates, or the Regional Office receives information through any other source regarding construction operations where there is a potential for exposure to isocyanates, the Regional Office shall:

- Document the status and condition of the work operation as far as they are known, noting any potentially serious hazard(s). Where possible, this should include process information (such as the type of process or conditions of exposure) that is indicative of the likelihood of exposure to an isocyanate. Documentation of the events leading up to the observation must be maintained in the file;
- Note the location of the workplace and name/address of the employer(s) performing the operation; and,
- Handle the complaint or referral in accordance with the procedures outlined in the VOSH FOM, VOSH PD 02-001G or its successor.

- When a safety CSHO is inspecting a construction site and observes an activity where potential isocyanate exposures are suspected, appropriate health referrals will be made.

2. General Industry / Maritime.

Complaint(s) or referral(s) for any general industry or maritime operation alleging potential exposures to isocyanates must be handled in accordance with the procedures outlined in Chapter 2 of the VOSH FOM, VOSH PD 02-001G, or its successor. Appendix A of this Isocyanates NEP provides information on general industry and maritime industries particularly likely to lead to worker exposures to isocyanates. Complaints and referrals alleging worker exposures to isocyanates or involving workers with occupational asthma from of isocyanates exposure or symptoms of exposure to isocyanates shall be treated as having priority and handled by an inspection.

F. Cooperative Programs.

Employers participating in cooperative programs may be exempt from programmed inspections. The CSHO should follow the procedures outlined in Chapter 3 of the VOSH FOM, VOSH PD 02-001G, or its successor, for additional guidance if an on-site consultation visit is in progress, or if the establishment is a participant in VOSH's Voluntary Protection Program (VPP) or the Safety and Health Achievement Recognition Program (SHARP). In any event, such employers should be notified in writing that the establishment was targeted for inspection under this instruction, and the employer should be encouraged to sample for isocyanates if it has not already done so.

G. Strategic Partnerships.

[RESERVED]

H. Expanding the Scope of the Inspection.

The CSHO may expand the scope of the inspection beyond the isocyanate-related work operations or activities if other workplace hazards or violations are observed and/or brought to the CSHO's attention. The CSHO shall follow the guidelines for expanding the scope of the inspection as set forth in VOSH PD 02-001G, Chapter 5, Section I.B., or its successor.

X. Inspection Procedures.

A. Opening Conference.

During the opening conference, the employer's status with respect to *VOSH PD 02-003M, or its successor, Enforcement Exemptions and Limitations Under the Appropriations Act*, shall be determined. Additionally, the CSHO will confirm that the employer's SIC/NAICS code is included under this program and review the employer's chemical inventory list and Safety Data Sheets (SDSs) (formally called Material Safety Data Sheets (MSDSs)) to confirm that the employer is using isocyanates. If a CSHO can verify that isocyanates are not in use at a listed establishment, the inspection should be discontinued, and another establishment shall be added to the cycle in its place to assure that the minimum number of sites is inspected each year. If an establishment is not one of the listed establishments but the CSHO has verified that the facility is using isocyanates, an inspection shall be initiated following this instruction.

B. Recordkeeping.

The employer's injury and illness records shall be reviewed to determine if injuries and illnesses related to isocyanate exposures have been recorded, including any work-related cases of asthma. If, during the course of the inspection, the CSHO determines that injuries and illnesses from exposures to isocyanates are not being recorded, the citation guidance in *VOSH PD 09-104 or its successor, Recordkeeping Policies and Procedures Manual*, shall be followed. The CSHO shall attempt to interview enough employees exposed to isocyanates to determine if there are unrecorded injury and illness cases.

Cases of occupational illness due to isocyanate exposure may be discovered during a review of the employer's injury and illness logs (OSHA 300). When a CSHO identifies a possible isocyanate-related occupational illness occurrence on the 300 Log, a medical access order (MAO) must be obtained in order to review a worker's medical records. See MAO directive, *VOSH PD 02-022A or its successor*, for further information. The CSHO may also request written permission of the worker to review his/her medical records. If the worker agrees, the Authorization Letter for the Release of Medical Records (See MAO Directive, Appendix B-1) shall be completed and signed by the worker.

Occupational illness information may also be obtained during worker interviews. The non-mandatory health surveillance form (Appendix C of this Directive) may be used when interviewing workers.

The Office of Occupational Medicine may be contacted if there are questions regarding documentation of cases of occupational illness, including evaluation of the health surveillance forms, review of medical records, interviews with healthcare providers, and analysis of the scientific literature. Regional Offices should coordinate their request to the VOSH Occupational Health Director for assistance of the Office of Occupational Medicine. Additional information on occupational medicine resources are found in Appendix H.

C. Exposure Assessments.

Inspections conducted under this Directive shall include an evaluation of the employer's controls (engineering controls, administrative and work practice controls, and personal protective equipment (PPE)) where potential exposures to isocyanates are present. The CSHO may contact the VOSH Director of Occupational Health for assistance when evaluating engineering and other controls.

NOTE: *The CSHO shall wear the appropriate personal protective equipment during all inspections, including when taking screening, area and/or personal isocyanate samples (air, skin), and must follow all safety and health precautions as found in the OSHA Field Safety and Health Manual, ADM 04-00-001.*

1. **Air Sampling.** Personal air samples shall be collected during inspections conducted under this NEP. The CSHO shall be prepared to take samples on the opening day of the inspection. If the process that uses isocyanates is not in operation the day of the inspection, the CSHO shall return at a later date to perform sampling. Where the employer has recent and accurate sampling exposure data (e.g., taken by VOSH Consultation, third party consultant, insurance company), the CSHO shall consult with the Regional Health Director to determine if further sampling is required. When operations using isocyanates are infrequent or unplanned, the CSHO shall consult with the Regional Health Director to determine if sampling is necessary.

Appendix B provides information to the CSHO on sampling protocol, how to order sampling media, and sample shipping instructions. CSHOs should contact the Salt Lake Technical Center (SLTC) laboratory for any questions regarding sampling for isocyanates. All VOSH Regional offices shall follow the air sampling protocol as described in Appendix B. Air samples collected during this NEP will be extracted in the field by CSHOs as described in Appendix B of this Directive.

Note: See Appendix B for a listing of OSHA sampling and analytical methods. Individual methods can also be found using the "Analytical Methods" link (<http://www.osha.gov/dts/sltc/methods/index.html>) on the OSHA public web site.

2. **Wipe Sampling.** Occupational exposure to isocyanates is a recognized cause of immune sensitization and asthma. Scientific research indicates that dermal exposure to isocyanates is at least as likely as inhalation exposure to induce isocyanate-related asthma. Experiments with laboratory animals have shown that dermal exposure alone to some isocyanates can be sufficient to induce respiratory sensitization. However, VOSH does not currently have any standards setting limits for surface contamination with, or dermal exposure to, isocyanates. Accordingly, if wipe sampling reveals surface contamination or dermal exposure, citations may be issued under the applicable housekeeping standards and/or PPE standards. For housekeeping violations cite §§1910.141 (General Industry), 1926.25 (Construction), 1915.81 (Shipyard), or 1918.91 (Longshoring). For PPE violations cite Part 1910 Subpart I (General Industry), 1926 Subpart E (Construction), 1915 Subpart I (Shipyard), or 1918 Subpart J, (Longshoring).
- a. **Surface sampling.** CSHOs should check for surface contamination (e.g., visible foam/coating) on surfaces, tools and equipment near the operation using isocyanates as well as in places where contamination may not be expected such as drinking fountains, telephones, locker rooms, and lunchrooms, to identify potential sources of dermal exposure and evaluate housekeeping and PPE deficiencies. Direct-reading colorimetric wipes can be used to sample surfaces for potential contamination.
 - b. **Dermal Sampling.** When the CSHO observes contaminated surfaces and equipment, dermal sampling should be conducted. Direct-reading colorimetric wipes can be used to sample dermal exposures.
 - c. **PPE Sampling.** Gloves are one of the most basic forms of PPE but their resistance to penetration by isocyanates may not be known. Direct-reading colorimetric media can be used to detect permeation of isocyanates through gloves. Other PPE should also be wipe sampled for contamination such as the inside of respirators. See Section C.2 for information on PPE evaluation.
 - d. **Methodology.** There are two types of direct-reading colorimetric wipe kits available for performing surface, dermal or PPE wipe sampling. One is for aliphatic isocyanates (e.g., Hexamethylene diisocyanate or HDI) and the other is for aromatic isocyanates (e.g., Methylene bisphenyl isocyanate or MDI). The CSHO shall document the results of any surface, dermal or PPE wipe sampling in the case file. In addition, when a wipe sample is collected the CSHO should add the code "IWIFE" on the OIS form under the Additional Information section. The OSHA Health Response Team can be consulted if the CSHO chooses to conduct surface, dermal, or PPE wipe sampling.

Both types of surface, dermal or permeation test kits are available from the Cincinnati Technical Center's (CTC's) agency expendable supplies program.

For general information on wipe sampling, refer to the OSHA/VOSH Technical Manual, Section II, Chapter 2, subsection V [VOSH PD 09-052] available at http://www.osha.gov/dts/osta/otm/otm_ii/otm_ii_2.html

Note: CSHOs should contact the Regional Health Director regarding contacting the SLTC laboratory for information regarding how to order wipe sampling media, and the wipe sampling and sample shipping procedures.

D. Citation Guidelines.

Where inhalation exposure to an isocyanate exceeds the VOSH PEL set forth at §1910.1000(a), Table Z-1, without regard to the use of respiratory protection, citations shall generally be issued as serious, following the citation policy in the VOSH FOM. Where an overexposure exists and feasible engineering and/or administrative controls were not utilized or were ineffective, an additional serious citation shall generally be issued under §1910.1000(e) and grouped with the overexposure citation.

Where workers are exposed to a particular isocyanate having an established OEL, but no PEL, a citation for exposure in excess of the OEL may be considered under the General Duty Clause, Va. Code §40.1-51.1.A. See VOSH FOM Chapter 10, Section III., K.2. (see Appendix F of this Directive for sample General Duty Clause violation language). Any General Duty Clause citation(s) for exposure to an isocyanate under this NEP must be reviewed by the VOSH Director, in consultation with the Division of Legal Support. If the elements of a General Duty violation are not met or a decision is made not to issue a citation, a Hazard Alert Letter (HAL) shall then be considered recommending specific actions that would reduce worker exposures to isocyanates. A sample hazard alert letter is included in Appendix D of this Directive. When a HAL is issued the code "IHAL" shall be coded on the OIS form under the Additional Information section.

If a worker is exposed to concentrations of a particular isocyanate below the PEL, but in excess of an established occupational exposure limit, citations will not normally be issued (see VOSH FOM, Chapter 10, Section III.,K.2.(5). To illustrate:

Exposure	Issue Citation	Consider General Duty Violation	Consider HAL
> PEL	✓		
No PEL, but > OEL,		✓	If General Duty not issued or elements not met
< PEL, but > OEL,		see VOSH FOM, Chapter 10, Section III., K.2.(5)	If General Duty violation not issued or elements not met
Reported illnesses/health effects (even if no overexposures have been documented)		✓ If serious illnesses/or health effects present and employer recognizes the hazard	If General Duty violation not issued or elements not met

Serious health effects are isocyanate-related illness cases recorded on the OSHA-300 log such as occupational dermatitis, i.e., not irritation, skin sensitization, gastrointestinal tract issues and work-related asthma.

If the employer has ten or fewer employees, the Regional Office shall follow the enforcement guidance outlined in *VOSH 02-003M* or its successor, *Enforcement Exemptions and Limitations Under the Appropriations Act*.

For citing improper personal hygiene practices for ingestion or absorption hazards, see VOSH FOM, Chapter 10, Section III.F.3. Dermal exposures occurring as a result of not using or misusing PPE or using ineffective PPE shall be cited as described in Section X.E.3 of this Directive.

Surface contamination shall be cited under Housekeeping as described in Section X.G.3 of this Directive.

E. Personal Protective Equipment (PPE).

1. **PPE Assessment.** At the opening conference, the CSHO shall review the employer's hazard assessment to determine compliance with the applicable PPE regulations, including Parts 1910 Subpart I (General Industry), 1926 Subpart E (Construction), 1915 Subpart I (Shipyard), and 1918 Subpart J (Longshoring).
2. **PPE Evaluation.** The CSHO shall evaluate whether the employer has ensured the use of appropriate PPE during operations using isocyanates and the CSHO shall evaluate the effectiveness of the PPE being used in the establishment. If the employer has failed to ensure the use of required PPE, or has selected PPE which is ineffective against isocyanates, a citation of the appropriate PPE standard shall be issued.
 - a. The use of appropriate personal protective clothing (e.g., coveralls, foot coverings) shall be evaluated. Employers shall require the use of personal protective clothing that is adequate to prevent contamination of an employee's personal clothing and skin.
 - b. The use of appropriate eye and/or face protection shall be evaluated. Employers shall require the use of eye and/or face protection that is adequate to protect the employee's eyes and/or face from exposure to isocyanates.
 - c. The use of appropriate respiratory protection shall be evaluated. Detailed inspection and citation guidance related to VOSH's respiratory protection standard, §1910.134, is contained in VOSH PD 02-411 or its successor, Inspection Procedures for the Respiratory Protection Standard.
 - d. The use of appropriate, chemical-resistant gloves (e.g., butyl, nitrile) shall be evaluated. Employers shall select and require the use of gloves that are adequate to protect the employees from dermal exposure to isocyanates (e.g., by checking the manufacturer's information about the glove type or the Safety Data Sheet (formally MSDS). See Section C.2.c above for information on PPE (permeation) sampling.
3. **Citation Guidelines.** All citations related to the employer's failure to ensure the use of appropriate and effective PPE during operations using isocyanates shall be cited in accordance with the VOSH FOM, the VOSH PPE Directive, VOSH PD 02-243A or its successor, Part 1910, Subpart I, Enforcement Guidance for Personal Protective Equipment (PPE) in General Industry, and/or VOSH PD 02-411, or its successor, Inspection Procedures for the Respiratory Protection Standard. Violations of the PPE standards shall be cited under the

applicable PPE regulation (see Parts 1910 Subpart I (General Industry), 1926 Subpart E (Construction), 1915 Subpart I (Shipyard), and 1918 Subpart J (Longshoring)).

F. Hazard Communication.

Detailed inspection and citation guidance related to the OSHA Hazard Communication Standard, §1910.1200, applicable to general industry, construction and maritime, is contained in *VOSH PD 02-060A or its successor, Inspection Procedures for the Hazard Communication Standard*. A determination of whether the employer's hazard communication program complies with §1910.1200 must include consideration of the training the employer provides to employees regarding the hazards associated with isocyanates. Failure to provide adequate training on the hazards of isocyanate exposure shall be cited in accordance with *VOSH PD 02-060A or its successor*.

Note: The Hazard Communication Standard (HCS) was revised March 2012. A revised HCS compliance instruction (CPL) will be issued, at which point CSHOs shall follow the revised HCS CPL.

G. Housekeeping.

1. **Housekeeping Evaluation.** The employer's methods for ensuring adequate housekeeping shall be evaluated and documented. The frequency of cleaning and methods used must be assessed when determining whether the employer's housekeeping practices may have contributed to employee illnesses associated with isocyanates (e.g., sensitization). See Section X.C.2 of this Directive for further guidance on wipe sampling methodology.
2. CSHOs should check for accumulation of isocyanates on surfaces and equipment in the work/process area, outside of the work/process area, and in eating and break areas, as well as cleaning schedules and/or a pattern of housekeeping hazards.
3. **Citation Guidelines.** Citations for violations of §§1910.141 (General Industry), 1926.25 (Construction), 1915.81 (Shipyard), and 1918.91 (Longshoring) shall be issued where poor housekeeping practices are documented (e.g., visible foam/coating on machinery, tools, floor or equipment near the operation) that present a risk to workers of dermal contact with isocyanates. Further information may be found in the VOSH FOM, Chapter 10, Section III. F.3.

H. Flammable and Combustible Products.

Where the chemical components of an isocyanate process or operation contain flammable or combustible materials, compliance with §§ 1910.106 and 1910.107 (General Industry), 1926.152 (Construction), and 1915.36 (Shipyard) shall be evaluated.

CSHOs shall cite observed and documented violations of these standards. Where an employer is in violation of §1910.106 or §1910.107 but is in full compliance with the most current version of NFPA 30 – *Flammable and Combustible Liquids Code* or NFPA 33 - *Standard for Spray Application Using Flammable or Combustible Materials*, respectively, violations of §1910.106 or §1910.107 will be classified as *de minimis*. The employer shall be verbally notified of *de minimis* violations, and it shall also be noted in the inspection case file.

XI. Follow-up Inspections.

To determine whether the employer has eliminated hazards or reduced exposures below the PEL (or OEL), follow-up inspections shall be conducted in accordance with the VOSH FOM, Chapter 3, Section I.B., based on available resources. Where exposures could not feasibly be reduced below the PEL (or OEL), engineering controls and administrative and work practice controls must still have been implemented to reduce exposures to the extent feasible, and workers provided with adequate respiratory protection and other appropriate PPE where necessary.

A follow-up inspection is not required when the Regional Office has specific knowledge and documentation indicating that the employer is no longer using isocyanates or there are no workers exposed to isocyanates.

XII. Hazard Alert Letter (HAL) - Follow-up.

A. HAL Follow-up.

Where a HAL has been sent to an employer for worker exposures to isocyanates, follow-up inspections will be conducted to verify that it has taken appropriate action to protect workers, unless the Regional Office has specific knowledge that the employer no longer uses, or workers are no longer exposed to, the isocyanate(s). The follow-up inspection should, based on resource availability, be made within 12 to 24 months after the HAL is originally issued.

B. Employer's HAL Progress.

During a HAL follow-up the CSHO shall evaluate the employer's efforts to address employee exposure to isocyanates.

1. Where the CSHO determines that the employer has adequately addressed exposures (e.g., air sample results below PEL, workers wearing appropriate PPE, good housekeeping practices), a closing conference shall be conducted.
2. Where the CSHO determines that the employer is making adequate progress (e.g., a ventilation system is being installed, no surface

accumulation) on abating worker exposures to the isocyanate hazards, the CSHO shall conduct a closing conference and exit the premises, and no citations shall be issued. However, at the Regional Director's discretion, a second HAL may be issued and another follow-up inspection conducted where necessary to ensure the continuation of abatement efforts.

3. Where the CSHO determines that the employer has made limited or no progress, the CSHO shall conduct an inspection using the procedures in this instruction.

XIII. VOSH Integrated Management Information System (IMIS) Coding.

All enforcement activities (inspections, complaints, and referrals) and compliance assistance interventions conducted under this NEP must be coded with the NEP code, "ISOCYAN8," entered in the appropriate IMIS field on the VOSH-1 form.

The majority of inspections conducted under this NEP will be coded as "Health (H)" inspections. If an inspection under this NEP is conducted in conjunction with an SST inspection (or other safety-related inspections), "H," the appropriate SST year (e.g., "SSTARG ___"), along with the NEP code "ISOCYAN8" must be entered in the appropriate IMIS fields on the VOSH-1 form.

Whenever a consultation request/visit is made in response to this NEP, the NEP code "ISOCYAN8" must be recorded in the appropriate field on the Consultation request/visit forms.

For inspections of firms that are planned or targeted as a result of this NEP, inspection type will be coded as "**Programmed Planned**" and then classification coded as NEP specifically indicating "ISOCYAN8".

An inspection that is conducted as a referral and inspected during the current inspection cycle under this NEP will be coded as "**Programmed Related**" and then classification coded as an NEP specifically indicating "ISOCYAN8". *Where "Program Related" inspections are conducted, they will be so indicated on the VOSH-1.*

Inspections under this NEP that are conducted as a result of a complaint or fatality/catastrophe will be coded as "**Unprogrammed Related**" and then classification coded as an NEP specifically indicating as "ISOCYAN8".

XIV. Outreach.

A. Offices.

Each Regional Office is encouraged to develop outreach programs that will support the efforts of the Department in meeting the Department's strategic goal of safe jobs for everyone. Such programs could include letters to employers, professional associations, local safety councils, apprenticeship programs, local hospitals and occupational health clinics, and other employer organizations for workplaces that have potential worker exposures to isocyanates or provide medical assistance in treating workers' illnesses

associated with exposure to isocyanates. Speeches, training sessions, and/or news releases through the local newspaper(s), safety councils and/or industrial hygiene organizations can provide other avenues for dissemination of information. Regional Office alliances developed with industry, labor groups, and other organizations could also be an effective way to reach out to affected employers and workers.

B. Online Materials.

OSHA resources may be of assistance in this outreach effort. A variety of online resources can be accessed through OSHA's public web page, www.osha.gov, including an Isocyanates Safety and Health Topics Page (available at <http://www.osha.gov/SLTC/isocyanates/index.html>). See also Appendix E for additional online resources and publications.

XV. Coordination.

This NEP will be coordinated for OSHA by the OSHA Directorate of Enforcement Programs (DEP) - Office of Health Enforcement (OHE).

The Director of the Virginia Occupational Health Program shall be the coordinator for this NEP for VOSH and will work with the OSHA Office of Health Enforcement and/or other state agencies as required. All questions and comments should be directed to the Director of Occupational Health for VOSH who will coordinate with the Directorate of Technical Support and Emergency Management (DTSEM), the OSHA Office of Occupational Medicine (OOM), and other OSHA offices for assistance as needed.

XVI. Program Evaluation.

This NEP will be evaluated using data collected from inspection case files and follow-up site visit reports submitted by each Regional Office to Headquarters. The data will be evaluated to determine the impact of VOSH inspections on the reduction of worker exposures to isocyanates.

Appendix A

Industries Where Isocyanate Exposures are Known or Likely to Occur⁵

- Automotive – paints, glues, insulation, sealants and fiber bonding, truck bed lining
- Casting – foundry cores
- Building and construction – sealants, glues, insulation material, fillers
- Electricity and electronics – cable insulation, PUR coated circuit boards
- Mechanical engineering – insulation material
- Paints – lacquers
- Plastics – soft and hard plastics, plastic foam and cellular plastic
- Printing – inks and lacquers
- Timber and furniture – adhesives, lacquers, upholstery stuffing and fabric
- Textile – synthetic textile fibers
- Medical care – PUR casts
- Mining – sealants and insulating materials
- Food industry – packaging materials and lacquers

The tables below provide a construction list as well as primary and secondary lists for general industry and maritime by SIC and NAICS codes. The construction list identifies sectors where construction workers are most likely to have exposures to isocyanates. The primary list includes general industry and maritime industries where exposures to isocyanates are known to occur, exposures have been demonstrated to be above the PEL, and workers have exhibited illnesses associated with exposure to isocyanates. The secondary list for general industry/maritime includes settings where exposures to isocyanates are known to occur, however not all establishments in these listed industries have necessarily documented worker overexposures to isocyanates.

Note: *The following are not exhaustive lists. A regional office may include an industry sector/code not listed if it falls within their regional office's jurisdiction.*

Construction

SIC	SIC TITLE	NAICS 2007	NAICS TITLE
1721	Painting and Paper Hanging	238230	Painting and Wall Covering Contractors
1742	Plastering, Drywall, Acoustical, and Insulation Work	238310	Drywall and Insulation Contractors
1752	Floor Laying and Other Floor Work, NEC	238330	Flooring Contractors
1793	Glass and Glazing Work	238150	Glass and Glazing Contractors

⁵ International Consensus Report on: Isocyanates – Risk assessment and management, 2001, pgs. 11-12, <http://www.arbeidstilsynet.no/binfil/download2.php?tid=77871>

1799	Special Trade Contractors, NEC	238150	Glass and Glazing Contractors
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General Industry/Maritime (Primary)

SIC	SIC Title	NAICS 2007	NAICS Title
2299	Textile goods, Not Elsewhere Classified	313230	Nonwoven Fabric Mills
2599	Furniture and Fixtures, Not Elsewhere Classified	339950	Sign Manufacturing
2851	Paints, Varnishes, Lacquers, Enamels, and Allied Products	325510	Paint and Coating Manufacturing
3089	Plastics Products, NEC	337215	Showcase, Partition, Shelving, and Locker Manufacturing
3281	Cut Stone and Stone Products	327991	Cut Stone and Stone Product Manufacturing
3442	Millwork/Metal Window and Door Manufacturing	332321	Wood or Metal framed windows and Doors, Manufacturing
3499	Fabricated Metal Products, Not Elsewhere Classified	332999	All Other Miscellaneous Fabricated Metal Product Manufacturing
3721	Aircraft and Parts	336411	Aircraft Manufacturing
3732	Boat Building and Repairing (boat building)	336612	Boat Building
3792	Travel Trailers and Campers	336214	Travel Trailer and Camper Manufacturing
7532*	Top, Body, and Upholstery Repair Shops and Paint Shops	811121*	Automotive Body, Paint, and Interior Repair and Maintenance

* = No target list currently available from DEA/OSA. Area Regional Offices may generate their own list for these SIC/NAICS industries which fall under their jurisdiction.

General Industry/Maritime (Secondary)

SIC	SIC Title	NAICS 2007	NAICS Title
2296	Tire Cord and Fabrics	314992	Tire Cord and Tire Fabric Mills
2396	Misc. Fabricated Textile Products	336360	Motor Vehicle Seating and Interior Trim Manufacturing
2396	Automotive Trimmings, Apparel Findings, and Related Products (textile motor vehicle trimming)	336360	Motor Vehicle Seating and Interior Trim Manufacturing

2431	Millwork	321911	Wood Window and Door Manufacturing
2435	Hardwood Veneer and Plywood	321211	Hardwood Veneer and Plywood Manufacturing
2436	Softwood Veneer and Plywood	321212	Softwood Veneer and Plywood Manufacturing
2493	Reconstituted Wood Products	321219	Reconstituted Wood Product Manufacturing
2531	Public Building and Related Furniture	336360	Motor Vehicle Seating and Interior Trim Manufacturing
2591	Drapery Hardware and Window Blinds and Shades	337920	Blind and Shade Manufacturing
2759	Commercial Printing, NEC	323112	Commercial Flexographic Printing
3052	Rubber and Baskets Hose and Belting	326220	Rubber and Plastics Hoses and Belting Manufacturing
3061	Molded, Extruded and Lathe-Cut Mechanical Rubber Goods	326291	Rubber Product Manufacturing for Mechanical Use
3069	Fabricated Rubber Products, NEC (except rubberized fabric and rubber resilient floor covering)	326299	All Other Rubber Product Manufacturing
3083	Laminated Plastics Plate, Sheet, and Profile Shapes	326130	Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing
3086	Plastics Foam Products (urethane and other foam)	326150	Urethane and other Foam Product (except Polystyrene) Manufacturing
3088	Plastics Plumbing Features	326191	Plastics Plumbing Fixture Manufacturing
3321	Gray and Ductile Iron Foundries	331511	Iron Foundries
3366	Copper Foundries	331525	Copper Foundries (except Die-Casting)
3479	Coating, Engraving, and Allied Services, NEC	332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers
3491	Industrial Valves	332911	Industrial Valve Manufacturing
3519	Internal Combustion Engines, NEC	333618	Other Engine Equipment Manufacturing

3585	Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment	333415	Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment Manufacturing
3632	Household Refrigerators and Home and Farm Freezers	335222	Household Refrigerator and Home Freezer Manufacturing
3677	Electronic Coils, Transformers, Other Conductors	334416	Electronic Coil, Transformer, and Other Inductor Manufacturing
3714	Motor Vehicle Parts and Accessories	336322	Other Motor Vehicle Electrical and Electronic Equipment Manufacturing
3842	Orthopedic, Prosthetic, and Surgical Appliances and Supplies	339999	All Other Miscellaneous Manufacturing
3911	Jewelry, Silverware, and Plated Ware	339911	Jewelry (except Costume) Manufacturing
3999	Manufacturing Industries, NEC	326199	All Other Plastics Product Manufacturing
4449	Water Transportation of Freight, NEC	483211	Inland Water Freight Transportation
4789	Transportation Services, NEC	488999	All Other Support Activities for Transportation
4911	Electric Services	221119	Other Electric Power Generation
4932	Gas, and Other Utility Services Combined	221210	Natural Gas Distribution
7538*	General Automotive Repair Shops	811111*	General Automotive Repair
7539*	Automotive Repair Shops, NEC	811118*	Other Automotive Mechanical and Electrical Repair and Maintenance
7549*	Automotive Services, Except Repair and Carwashes	488410*	Motor Vehicle Towing
		811122	Automotive Glass Replacement Shops
		811191	Automotive Oil Change and Lubrication Shops
		811198	All Other Automotive Repair and Maintenance

* = No target list currently available from DEA/OSA. Regional Offices may generate their own list for these SIC/NAICS industries which fall under their jurisdiction.

Appendix B

**ISOCYANATE SAMPLING, FIELD EXTRACTION,
and SAMPLE SHIPMENT PROCEDURES**

The CSHO should contact the SLTC laboratory directly for questions regarding a sampling and/or analytical method.

(Ref: OSHA [Chemical Sampling Information](#))

Isocyanate CAS no. OSHA IMIS no.	Synonyms	Vapor Pressure	Occupational Exposure Limits (OEL)						OSHA Method no.	Sampling Medium	Flow Rate (L/min)	Sample Volume (L)
			OSHA PEL		NIOSH REL ¹		ACGIH TLV ^{®2}					
			ppm	mg/m ³	ppm	mg/m ³	ppm	mg/m ³				
Methyl isocyanate 624-83-9 1773	MIC; Isocyanatomethane	348 mmHg @ 68 °F	0.02 T	0.05 T	0.02 T	0.05 T	0.02 T		Method 54 FV	XAD-7 tube 1-2PP	0.05	15
Methylene bisphenyl isocyanate 101-68-8 1073	4,4-Diphenylmethane diisocyanate; MDI; 4,4-Diisocyanadiphenyl-methane; Methylene bis(4- phenylisocyanate); Methylene Bis(Phenyl Isocyanate)	0.000005 mmHg @ 77 °F	0.02 C	0.2 C	0.005 T 0.02 C	0.050 T 0.2 C	0.005 T		Method 47 FV	GFF 1-2PP	1.0	15
Toluene-2,4- diisocyanate (TDI) 584-84-9 2470	2,4-Diisocyanato-1- methylbenzene; TDI; 2,4-TDI; 2,4-Toluene diisocyanate	0.01 mmHg @ 77 °F	0.02 C	0.14 C		4	0.005 ⁵ T 0.02 STEL		Method 42 FV	GFF 1-2PP	1.0	15 to 240
Hexamethylene diisocyanate 822-06-0 1377	HDI; HMDI; 1,6-Diisocyanatohexane	0.5 mmHg @ 77 °F			0.005 T 0.02 C ⁶	0.035 T 0.14 C ⁶	0.005 T		Method 42 FV	GFF 1-2PP	1.0	15
1,6-Hexamethylene diisocyanate biuret 4035-89-6 D668	1,6-Hexamethylene diisocyanate Biuret; HDI Biuret; HDIB	0.000075 mmHg @ 77 °F							PV2030 PV	GFF 1-2PP	1.0	15

Isocyanate CAS no. OSHA IMIS no.	Synonyms	Vapor Pressure	Occupational Exposure Limits (OEL)						OSHA Method no.	Sampling Medium	Flow Rate (L/min)	Sample Volume (L)
			OSHA PEL		NIOSH REL ¹		ACGIH TLV ^{®2}					
			ppm	mg/m ³	ppm	mg/m ³	ppm	mg/m ³				
1,6-Hexamethylene diisocyanate homopolymer 28182-81-2 H130	Hexamethylene Diisocyanate Homopolymer; HDIH; Desmodur N3300; 1,6-Diisocyanato-Hexane Homopolymer; Poly(hexamethylene diisocyanate)	5.2x10 ⁻⁹ mmHg @ 77 °F							PV2125 PV	GFF 1-2PP	1.0	15
Isophorene diisocyanate 4098-71-9 1539	IPDI; Isocyanic acid, methylene (3,5,5-trimethyl-3,1-cyclohexylene) ester; 3-Isocyanatomethyl-3,5,5-trimethylcyclohexyl-isocyanate; Isophorone diamine diisocyanate	0.0003 mmHg @ 68 °F			0.005 T 0.02 ST	0.045 T 0.18 ST	0.005 T		PV2034 PV	GFF 1-2PP	1.0	15 To 60
Methylene-bis(4-cyclohexylisocyanate) 5124-30-1 2651	Hydrogenated MDI; Dicyclohexylmethane-4,4'-diisocyanate; HMDI; Desmodur W	5.2x10 ⁻⁹ mmHg @ 77 °F			0.01 C ⁶	0.11 C ⁶	0.005 T		PV2092 PV	GFF 1-2PP	1.0	15
1,5-Napthalene diisocyanate 3173-72-6 N119	1,5-Naphthylene Ester Isocyanic Acid, Napthalene Diisocyanate	0.003 mmHg @ 75°F			0.005 T 0.02 C ⁶	0.04 T 0.17 C ⁶			PV2046 PV	GFF 1-2PP	1.0	60
Toluene-2,6-diisocyanate ³ 91-08-7 T177	2,6-diisocyanato-1-methylbenzene; 2,6-TDI	0.01 mmHg @ 77 °F					0.005 ⁵ T 0.02 STEL		Method 42 FV	GFF 1-2PP	1.0	15 to 240

CAS = Chemical Abstract System

IMIS = Integrated Management Information System

C = 15-minute ceiling; T = 8-hour time-weighted average; ST = short-term exposure limit; STEL = short-term exposure limit

FV = fully validated method, PV is partially validated method

GFF = glass fiber filter

1-2PP = 1-(2-pyridyl)piperazine

¹REL = NIOSH recommended exposure limit

²American Conference of Governmental Industrial Hygienists Threshold Limit Value 2010

³Toluene-2,6-diisocyanate is usually not found in a pure state and often occurs in a mixture of 80% toluene-2,4-diisocyanate and 20% toluene-2,6-diisocyanate

⁴NIOSH has designated toluene-2,4-diisocyanate as an occupational carcinogen with no safe exposure level

⁵ACGIH TLV for toluene diisocyanate is for toluene-2,4- or 2,6-diisocyanate, or a mixture of the two: Notice of Intended Change 0.001 ppm TWA, 0.003 ppm STEL Inhalable fraction and vapor.

⁶NIOSH Ceiling REL is a 10-min average

ISOCYANATE SAMPLING, FIELD EXTRACTION, and SAMPLE SHIPMENT PROCEDURES

Introduction

Chemicals containing the isocyanate functional group (-NCO) can contain more than one isocyanate group, for example toluene diisocyanate has two isocyanate groups, but as a class of chemicals they are often collectively referred to as isocyanates.

Except for methyl isocyanate which is extremely volatile and is sampled using coated adsorbent tubes, OSHA monitors workplace exposure to isocyanates using glass fiber filters that are impregnated with 1 milligram of 1-(2-pyridyl)piperazine (1-2PP). 1-2PP reacts with isocyanates to form a stable chemical derivative. These samples are normally extracted and analyzed by chemists at OSHA's laboratory in Salt Lake City, Utah. OSHA compliance officers will now be instructed in how to perform field extraction of isocyanate samples when using filter sampling procedures. Methyl isocyanate samples do not have the same derivatization issues inherent in filter samples and they do not require field extraction.

This isocyanate sampling, field extraction, and sample shipment protocol is now standard operating procedure to be followed for this NEP. All area regional and field offices must follow this procedure.

Purpose of Field Extraction

The purpose of field extraction is to enhance the recovery of highly reactive isocyanates that are collected on the air sampler but for various reasons do not come into contact with the derivatization reagent coated on the filter. Such isocyanates may become unavailable for reaction with the 1-2PP reagent because of unwanted chemical side-reactions that occur during or after sampling. One way to bring collected isocyanates and the reagent into contact is to extract the samples immediately after sampling. Field extraction is of benefit only if it is performed immediately after sampling.

Apparatus

Personal sampling pump. A personal sampling pump that can be calibrated to within $\pm 5\%$ at the recommended flow rate with the sampling device in line.

Coated glass fiber filters. Glass fiber filters (GFF) coated with 1.0 mg 1-(2-pyridyl) piperazine (1-2PP). Coated GFFs can be obtained from SLTC using the "SLTC Supplied Sample Media Order Form." Store the coated filters in a refrigerator until use. Avoid exposure of the coated filters to sunlight or heat. Discard the coated filters if they are not used within a month after receipt from SLTC. VOSH employees can also obtain the coated adsorbent tubes used for methyl isocyanate from SLTC.

Field extraction solution. The field extraction vials each contain 3-mL of a solution composed of 90% v/v acetonitrile and 10% v/v dimethyl sulfoxide. **CAUTION.** These are both extremely toxic and flammable solvents (see MSDS). VOSH employees can obtain glass vials containing the correct volume of field extraction solution from SLTC in the same way that the coated filters were obtained. It is important to keep the packaging material in which the vials containing the extraction solution was shipped from SLTC for use to pack and return the vials to SLTC for analysis.

Vial rack (tray) to hold extraction solvent vials, sized for 15-mm vials. Vial racks are used to secure the field extraction vials because they may help prevent spilling of the solvent.

Backup (support) pads. 37-mm cellulose.

Polystyrene cassettes. Three piece, 37-mm standard with top, bottom, and ring pieces and end plugs.

Isocyanate sampler. Except for methyl isocyanate, OSHA's methods for isocyanates specify sampling using the filter cassette sampler shown in Figure 1. Assemble the three-piece polystyrene cassette containing a coated glass fiber filter and a backup pad as shown in Figure 1. Use disposable gloves and metal forceps to handle the filters. There is no need to change gloves for each sampler to be assembled. Do not assemble more cassette samplers than expected to be used in a single sampling site visit. Do not expose the assembled isocyanate samplers to high temperatures or direct sunlight.

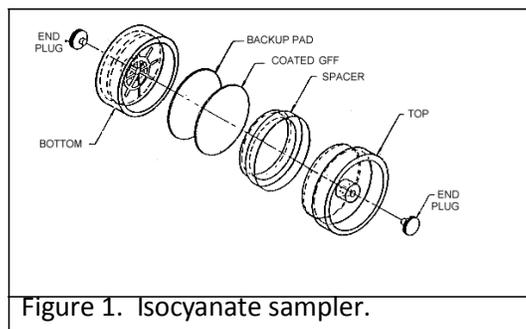


Figure 1. Isocyanate sampler.

Disposable gloves. Disposable nitrile gloves such as Ansell "Touch N Tuff," no. 92-600, are convenient and have good touch sensation properties. **CAUTION.** The Ansell "Touch N Tuff" gloves are rated by the manufacturer as having excellent resistance to dimethyl sulfoxide, but only fair resistance to acetonitrile. Immediately change the gloves if you spill solvent on them. Equivalent gloves from another manufacturer can also be used.

Metal Forceps

Clean the forceps with isopropyl alcohol and wipe them dry before each use. Isopropyl alcohol obtained from a local pharmacy is adequate for cleaning purposes.

A six-pack cooler together with frozen ice packs (e.g., Blue-Ice type or equivalent) is a convenient and effective way to transport sampling and extraction media to and from the CSHO's office in a vehicle. This is a precaution intended to prevent degradation of the sampling media.

The Cincinnati Technical Center (CTC) has available an Isocyanates Sampling Kit (FES0001912) that has the equipment necessary to extract air samples in the field. These supplies can be ordered together as a kit, or each item can be ordered separately through CTC.

Sampling Procedure

Sample open-face by removing the top piece and the end plug from the cassette sampler immediately before sampling.

Attach the cassette to the calibrated sampling pump with flexible tubing and position it in the workers breathing zone so that it is in an approximately vertical position with the open-face pointing down during sampling. Position the sampling pump, cassette and tubing so it does not impede work performance or worker safety.

Do not allow air being sampled to pass through any hose or tubing before entering the cassette.

Sample for the appropriate time using the flow rate shown in Table 2 of Appendix B.

Field Extraction Procedure

Wear disposable gloves for the following procedure and do not spill any of the solvent because this will affect sample results. Extract each sample separately and wear new gloves for each sample. **CAUTION.** The extraction solution is extremely toxic and flammable (see MSDS). Immediately after sampling and in a clean location remove the coated filter from the cassette using clean forceps and place it in the glass vial containing the field extraction solution. If you spill any solvent on your gloves, replace them with new gloves immediately. Place the filter flat against the inside surface of the vial. Do not fold or crumple the filter. Immediately tightly seal the vial with the lined cap. Check to be certain that the cap on the vial is firmly tightened and does not leak. Vigorously shake the vial to wet the filter. Properly identify the sample and wrap each sample with a Form OSHA-21. Note any solvent spills on the Form OSHA-91A. Discard the backup pad and the polystyrene cassette in the regular trash.

Submit at least one blank sample with each set of samples. Extract and handle the blank sampler in the same manner as the other samples except draw no air through it. Do not leave the cassette top off the blank sample while air samples are being collected. Briefly remove the top cassette piece from the blank sample and then immediately replace it and extract the sample.

Record sample air volume (in liters of air) for each sample, along with any potential interference such as anhydrides, amines, alcohols, and carboxylic acids on the Form OSHA-91A.

Waste from the field extraction procedure except for the extraction solvent can be disposed of as regular trash. The CSHO's office may want to keep unused coated filters if they will be sampling again within the next month otherwise they can be disposed of as regular trash. The extraction solvent should either be returned to SLTC for disposal or disposed of locally if the office has access to a hazardous waste handler (e.g., perhaps a local laboratory could dispose of the waste).

Shipping Procedure

Ship any bulk samples separate from the air samples.

Use the same packaging material in which the vials containing the extraction solution was shipped from SLTC to pack and return the sample extraction vials to SLTC for analysis.

Submit the extracted samples to SLTC for analysis as soon as possible after sampling. As a precaution, store the samples in a refrigerator for up to 1 week if delay is unavoidable. The samples do not require refrigerated shipment. Be certain to follow all applicable hazardous materials shipping restrictions and requirements. Persons shipping hazardous goods must be trained and certified by an authorized contract carrier such as UPS or FedEx that has been approved by U.S. Department of Transportation (DOT).

CSHOs should check with their area director to obtain the required DOT Hazardous Goods training.

Resources

OSHA's sampling and analytical methods for isocyanates can be accessed and downloaded from OSHA's public website www.osha.gov. They are located under Chemical Sampling Information.

Appendix C

Health Surveillance Form (Non-mandatory) – Isocyanate Exposure

Interviewer: _____ Date: _____

Worker Name: _____

1. What was the month and year that you were hired at this company? _____

2. What is your job title? _____

3. Please describe your job duties: _____

4. How many hours per week do you work on average? _____

5. In what area or areas of the plant do you work? _____

6. Have there been any recent changes to your immediate work environment or processes in your worksite? ___ YES ___ NO

a. If **YES**, what has changed and when? _____

7. Do you use any of the following personal protective equipment while working or while in the work area?

a. Respirator ___ YES ___ NO TYPE _____

b. Gloves ___ YES ___ NO TYPE _____

c. Protective Clothing ___ YES ___ NO TYPE _____

d. Eye Protection ___ YES ___ NO TYPE _____

e. Other Protective Equipment (If worker answers **YES**, please list below):

*Please ask the worker the following questions in regard to past and current medical conditions: (For **YES** responses, note the month and date of first diagnosis).*

8. Has a doctor ever told you that you have asthma? ___ YES ___ NO

If **YES**, when did the doctor tell you this? _____

9. Has a doctor ever told you that you have any of the following work-related conditions?

a. Work-related asthma - ___ YES ___ NO

If **YES**, when did the doctor tell you this? _____

b. Allergies from exposures at work - ___ YES ___ NO

If **YES**, when did the doctor tell you this? _____

c. Bronchitis from exposures at work - ___ YES ___ NO

If **YES**, when did the doctor tell you this? _____

d. Skin rash from exposures at work - ___ YES ___ NO

If **YES**, when did the doctor tell you this? _____

e. Hypersensitivity pneumonitis - ___ YES ___ NO

If **YES**, when did the doctor tell you this? _____

(If the worker has been diagnosed with any work-related condition or has symptoms that may be associated with isocyanate exposure, consider asking the worker to sign a medical release to

obtain a copy of the worker's personal medical records or obtain a medical access order (MAO) for the worker's employer medical records).

10. Please ask the worker the following questions regarding symptoms. (If worker answers **NO**, go to the next symptom. If the answer is **YES**, ask the questions across the row):

Symptom*	YES	NO	If yes, approximately what date did you first notice symptoms?	Do your symptoms occur at work?	Do your symptoms improve when you are away from work such as while on vacation or on the weekends? <i>(Describe):</i>	Do you think your symptoms are brought on by any particular work activity, chemical exposure, or work area? <i>(Describe):</i>
Cough						
Wheezing						
Watery or itchy eyes						
Nose stuffiness or itching						
Skin rash or itching						
Shortness of breath						
Chest tightness						
Fever or chills						

*Not related to a cold or infection

11. Have you missed any days from work because of respiratory symptoms? **YES** **NO**

12. Have you been restricted or transferred from one job assignment to another because of respiratory symptoms? **YES** **NO**

13. Have you informed anyone in management or supervision of symptoms related to isocyanate exposure? **YES** **NO**

Other Comments:

Appendix D

Sample Isocyanates Hazard Alert Letter

Note: This letter must be adapted to the specific circumstances noted in each inspection. The letter below is an example of the type of letter that may be appropriate in some circumstances. If the employer has implemented, or is in the process of implementing efforts to address problem conditions, those efforts should be recognized and encouraged, if appropriate.

Italicized comments are for VOSH compliance use only and should not be included in the letter.

Dear Employer:

An inspection of your workplace and evaluation of your OSHA recordkeeping logs at *(location)* on *(date)* disclosed the following condition(s), which are consistent with employee exposure to *(list isocyanate)*, a known occupational health hazard; *(list conditions)*.

(Include a general description of the risk factors for each task/job associated with respiratory sensitization/asthma, such as lack of ventilation, lack of PPE, inappropriate PPE, etc.)

Even though sampling did not show exposures above an OSHA/VOSH permissible exposure limit, in the interest of workplace safety and health, I recommend that you voluntarily take the necessary steps to materially reduce or eliminate your employees' exposure to the conditions listed above.

While the risk of health hazards associated with exposure to isocyanates can be reduced or eliminated by implementing a single means of abatement, in most cases a variety of abatement methods will provide a more effective method of addressing these hazards. These include workplace analysis of jobs and tasks to assess hazards associated with those jobs and tasks and the steps to abate them; product substitutions; engineering, administrative and work practice controls; accurate injury and illness recordkeeping; medical surveillance; medical management of occupational illnesses and injuries; education and training of employees; and management oversight. When respiratory sensitization, asthma or other hazards associated with isocyanate exposure are addressed on an incremental basis to determine the effectiveness of a specific control strategy, it is important to evaluate the effectiveness of the results in a timely manner. If the initial control strategy fails to eliminate or substantially reduce employee exposures, additional control measures should be implemented.

We have examined available information on the hazards associated with these jobs/tasks, and your efforts to address these hazards. The evaluation suggests that the following additional methods of abatement should be implemented.

1. **Engineering Controls**

If substitution is not possible, engineering controls are the first line of defense in employee protection. Therefore, employers should provide appropriate engineering controls and should train their employees in their use and in proper work practices to ensure that employee occupational exposure to isocyanates are maintained below levels hazardous to employees. The following engineering controls are recommended:

- *(list possible engineering controls: local exhaust ventilation, automated process, isolating the process, etc.)*

2. **Administrative and Work Practices Controls**

The following work practices should be used to ensure that occupational exposure to an isocyanate(s) during *(list operation(s))* is (are) reduced:

- *(List possible controls such as: limiting the time employees are exposed);*
- *(Job rotation);*
- *(Monitor employee exposures on a regular basis);*
- *(Limit the number of employees who have access to areas where the operation occurs);*
- *(Provide separate lockers for work clothes and street clothes);*
- *(Do not eat, drink, apply cosmetics or use tobacco products in work area(s));*
- *(Do not leave the workplace wearing protective work clothing or equipment or take it home to launder);*
- *(Wash face, hands, and forearms before eating, drinking, smoking, or applying cosmetics);*
- *(Shower at end of work shift);*
- *(Immediately and thoroughly wash off skin with soap and flowing water if dermal contact occurs);*
- *(Wear appropriate personal protective equipment);*
- *(A medical surveillance program as described in Appendix I);*
- *(Etc.)*

3. **Personal Protective Equipment**

To be effective, personal protective equipment must be individually selected; properly fitted and periodically refitted; conscientiously and properly worn; regularly maintained; and replaced as necessary. In addition, employers must:

- Perform a workplace hazard assessment in accordance with §1910.132(d) (or equivalent construction or maritime standard) to determine if hazards are present, or are likely to be present which necessitate the use of personal protective equipment (PPE);
- Provide and ensure the use of the appropriate gloves (e.g., butyl, nitrile), goggles, and protective clothing when a potential for eye or dermal exposure exists (e.g., exposure to contaminated equipment, chemical containers, etc.);
- Train employees on the limitations and use of PPE required during *(list operations)*;
- Establish, implement, and maintain a written respiratory protection program in accordance with §1910.134(c) whenever the employer requires the use of respiratory protection;
- Provide and ensure that employees use appropriate respiratory protection;
- *(Etc.)*.

4. **Training and Information**

Employers must comply with the OSHA Hazard Communication standard, §1910.1200. In particular, employers must ensure that employees exposed to isocyanates are trained in and have access to the following information:

- The specific nature of the operations in their workplace where exposure may occur;
- Safety Data Sheets (SDSs) for chemicals containing isocyanates;
- The signs and symptoms of isocyanate exposure;
- The importance of avoiding dermal contact when working with isocyanates;
- The engineering controls the employer is using to reduce employee exposures to isocyanates;
- Specific work practices that should be used to reduce exposure to isocyanates;
- The use of appropriate protective equipment, including respirators and skin protection and the limitations of that equipment; and
- Methods that may be used to detect the presence of the isocyanates in the workplace, such as workplace monitoring.

In addition, the results of any air or wipe sampling the employer or others have conducted for levels of isocyanates should be shared with employees and/or their representative.

(Using the above components, together with information gathered during the inspection, describe the specific conditions or weaknesses and suggest methods of abatement.)

You may voluntarily provide this Regional or Field Office with progress reports on your efforts to address these conditions. VOSH may return to your worksite to further examine the conditions noted above.

Enclosed is a list of available resources that may be of assistance to you in preventing work-related injuries and illnesses in your workplace.

If you have any questions, please feel free to call *[name]* at *[phone number]*.

Sincerely,

Regional Director

Enclosure

Appendix E

Publications and Resources

OSHA publications are available online at <http://www.osha.gov/pls/publications/publication.html>. If you are unable to access the online publications and would like to place an order, please contact the OSHA Publications Office at 1-800-321-OSHA (6742).

OSHA Online Resources:

[*Safety and Health Topics Page on Isocyanates*](#)

[*Safety and Health Topics Page on Occupational Asthma*](#)

[*Safety and Health Topics Page on Hazard Communication*](#)

[*Safety and Health Topics Page on Personal Protective Equipment*](#)

[*Safety and Health Topics Page on Respiratory Protection*](#)

[*Safety and Health Topics Page on Spray Operations Safety and*](#)

[*Health Topics Page on Ventilation*](#)

Additional Safety and Health Topics Pages can be found online at [OSHA Safety and Health Topics](#).

OSHA Publications:

- [Chemical Hazard Communication](#) (No. 3084)
- [Hazard Communication Guidelines for Compliance](#) (No. 3111)
- [Job Hazard Analysis Guide](#) (No. 3071)
- [Personal Protective Equipment](#) (No. 3151)
- [Small Business Handbook](#) (No. 2209)
- [Small Entity Compliance Guide for Respiratory Protection Standard](#) (CFR 1910.134), (No. 9071)

[OSHA/NIOSH Spirometry InfoSheet](#) - <http://www.osha.gov/Publications/osha3415.pdf>

[OSHA/NIOSH Spirometry Worker Info](#) - <http://www.osha.gov/Publications/osha3418.pdf>

OSHA Small Business Assistance:

Small business owners who are concerned about the cost of professional help can contact the OSHA Consultation Project Office in their state for free consultation service. Priority is given to businesses with fewer than 250 employees at a worksite, with further consideration given to the severity of the worksite problem. The OSHA Consultation Program can help employers evaluate and prevent hazardous conditions in their workplace that can cause injuries and illnesses, including the hazards associated with exposures to isocyanates. For more compliance assistance information, please visit OSHA's Small Business web page at <http://www.osha.gov/dcsp/smallbusiness/index.html>.

National Institute for Occupational Safety and Health (NIOSH) Resources:

NIOSH [Safety and Health Topics Page on Isocyanates](#)

NIOSH [Safety and Health Topics Page on Asthma and Allergies](#)

NIOSH *Preventing Asthma & Death from MDI Exposure During Spray-on Truck Bed Liner and Related Applications*, (Sept. 2006), DHHS Pub. No. 2006-149

Other Resources:

Heederik, Derrick, Henneberger, Paul A. and Relich, Carrie A. (2012). "Primary prevention: exposure reduction, skin exposure and respiratory protection." *European Respiratory Review* 21(124), 112-114. Available at: <http://err.ersjournals.com/content/21/124/112.full.pdf>

De Vries, Thomas, Bello, Dhimiter, Stowe, Meredith H., Harari, Homero, Slade, Martin D., and Redlich, Carrie A. (2012). "Transferability of Aliphatic Isocyanates from Recently Applied Paints to the Skin of Auto Body Shop Workers." *Journal of Occupational and Environmental Hygiene*, 9, 699-711. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/23067057>

Arrandale, V.H., Liss, G.M., Tarlo, S.M., Pratt, M.D., Sasseville, D., Kudla, I., Holness, D.L. (2012). "Occupational Contact Allergens: Are They Also Associated With Occupational Asthma?" *American Journal of Industrial Medicine*, 353-60. Available at: www.ncbi.nlm.nih.gov/pubmed/22238032

Bello, Dhimiter, Herrick, Christina A., Smith, Thomas J., Woskie, Susan R., Streicher, Robert P., Cullen, Mark R., Liu, Youcheng, Redlich, Carrie A. (2007). "Skin Exposure to Isocyanates: Reason for Concern." *Environmental Health Perspectives*, 115(3), 328-335. Available at: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1849909/>

Appendix F

Sample General Duty Clause Citation Language

Where exposures to isocyanates exist and the conditions meet the elements of a 5(a)(1) [Va. Code §40.1-51.1.A.] violation, a General Duty Clause citation may be issued. Below is an example of language to use for a 5(a)(1) [Va. Code §40.1-51.1.A.] citation.

Section 5(a)(1) of the Occupational Safety and Health Act of 1970 [Va. Code §40.1-51.1.A.]: The employer did not furnish a place of employment that was free from recognized hazards that were causing or were likely to cause death or serious physical harm to employees in that employees were exposed to (*chemical name*), which was causing or likely to cause respiratory illness such as asthma or skin sensitization:

- a. On or about (*date*), (*list employee titles, or names*) working in the (*name area(s)*) was/were exposed to (*name chemical*). Exposures occurred via (*list routes of entry: inhalation, ingestion, dermal absorption, etc.*) at concentrations of (*list exposure levels, surface/dermal contamination levels*).

The employer could feasibly adopt measures that would be effective in reducing or eliminating employee exposure to (*name chemical*) and the associated risk of developing (*asthma or other effects of exposure/disease*). Examples of such measures may include:

- 1) Engineering controls including (*if applicable, list relevant engineering controls, such as local exhaust ventilation, substitution, etc.*).
- 2) Administrative and work practice controls, including (*if applicable, list relevant administrative and work practice controls, such as rotation, cleaning working surfaces, maintenance of engineering controls, medical monitoring, etc.*).
- 3) Personal Protective Equipment, including (*if applicable, list relevant PPE*).

Appendix G

General Guidance for Employers on Personal Protective Equipment (including Respiratory Protection) for Worker Exposures to Isocyanates

The following information is adapted for this NEP based on information obtained from the Region 2 Isocyanate Local Emphasis Program.

Employers are required to make a hazard assessment of their workplace to determine what kinds of personal protective equipment (PPE) their employees need for protection against isocyanates. The types of PPE selected will be influenced by a number of factors, such as the specific job functions of the worker and the chemical resistance of the PPE. An effective PPE program greatly increases the effectiveness of protective gear. See Parts 1910 Subpart I (General Industry), 1926 Subpart E (Construction), 1915 Subpart I (Shipyard), and 1918 Subpart J (Longshoring).

Specific Job Functions

The nature of the job being performed will greatly influence the selection and features of protective clothing. For example, workers that are analyzing foam samples in a laboratory may require light-duty gloves (at least 5 millimeters in thickness) that are flexible and preserve manual dexterity. The potential for worker exposure is limited to a localized area and may only require gloves and either a lab apron or lab coat, in addition to eye protection. In contrast, a maintenance project, such as repairing a pump line, may require workers to wear thicker gloves that are rugged and durable, as well as hooded chemically-resistant overalls and boots.

General Principles of Personal Protective Equipment Selection

- The item must be suitable for the job the worker is to perform.
- The item must offer a protection time that exceeds potential exposure times.
- The item must be replaced before protection time is exceeded.
- Disposable items are preferable to reusable ones, because of contamination/decontamination issues.

Chemical Resistance of Glove or Clothing

To be effective, the protective clothing must resist permeation and penetration by the chemical or chemicals being handled. Use of disposable gloves and clothing is preferred because proper decontamination of reusable items is often difficult. The employer should request documentation from the manufacturer or distributor specifying if the protective equipment meets the appropriate test standard(s) for the type(s) of chemical(s) used in the workplace. For example, some isocyanates may be part of a solvent mixture, so the gloves must protect against the solvent also.

The protection time of PPE is an important selection consideration. Protection time is the time required for a chemical to permeate or make its way through the chemical protective glove or clothing material, and is the material's maximum use time. Keep in mind that isocyanates are often found as a mixture with other chemicals, especially solvents. Gloves and clothing may be affected by solvents, which can

reduce the time it takes for solvents and isocyanates to permeate the glove material. PPE manufacturers are able to provide protection times for their equipment. It is important for the wearer to understand the need to change gloves and clothing often enough to avoid exceeding manufacturers' stated protection times and to prevent skin contact with isocyanates. The manual dexterity requirements of some jobs require the use of thin, form-fitting gloves. These may offer limited amounts of protection time, so use of such gloves is acceptable only if the gloves are changed with sufficient frequency. For example, if a job requires the use of thin, flexible gloves with a 30-minute protection time for isocyanates, then the wearer should change gloves within 30 minutes from initial contact with the isocyanate-containing compound.

Eye and/or Face Protection

Based on the operation, either safety goggles or a face shield may be required when working with isocyanates.

Respiratory Protection – General

An effective written respiratory protection program must be developed and implemented in accordance with [§1910.134](#). Key provisions include assignment of a program administrator, fit testing, medical evaluations, proper use of respirators, training and information (including the need for a user seal check each time the respirator is donned), maintenance and care of respirators, program evaluation and recordkeeping.

Respirator Evaluation and Selection

The employer is required to select the appropriate respirator for each situation in which employees are exposed to isocyanates above the PEL or at any level that poses a recognized hazard of death or serious injury or illness to workers. Some factors that must be included in the evaluation by the employer are as follows.

- A. The concentration of isocyanates in the air to which employees will be exposed must be considered. MDI and TDI have OSHA Ceiling Limits; Methyl Isocyanate has an 8-hour TWA PEL. See [Appendix B](#). Other isocyanates have been evaluated by other organizations and have occupational exposure limits such as the NIOSH REL or ACGIH TLV. Paragraph 1910.134(d)(3)(i) requires the employer to “provide a respirator that is adequate to protect the health of the employee and ensure compliance with all other OSHA statutory and regulatory requirements under routine and reasonably foreseeable emergency situations.” Therefore, when selecting a respirator for protection against substances that have TWA PEL or Ceiling Limits, the employer must not only consider if exposure levels may be reached or exceeded during routine operations, but also if they may be exceeded during reasonably foreseeable emergency situations. The employer must then select a respirator that would provide adequate protection against these levels.
- B. Negative pressure respirators carry a greater risk of leakage than positive pressure respirators. If the face-to-facepiece seal is compromised (e.g., because of beard growth), more contaminated air is likely to leak in than would be the case with positive pressure respirators.

The protection factor of the respirator needs to be taken into account when selecting a respirator. Paragraph 1910.134(d)(3)(i)(A) discusses the protection factors of the respirators. The respirator chosen must protect the employee from the concentration of isocyanate to which they are being exposed.

Paragraph 1910.134(d)(1)(i) states, “the employer shall select and provide an appropriate respirator based on the respiratory hazard(s) to which the worker is exposed and the workplace and user factors that affect respirator performance and reliability.”

Paragraph 1910.134(d)(3)(iii)(B) further states that for protection against gases and vapors at levels that are not Immediately Dangerous to Life or Health (IDLH) an air-purifying respirator may be used, provided that:

1. The respirator is equipped with an end-of-service life indicator (ESLI) certified by NIOSH for the contaminant; or
2. If there is no ESLI appropriate for conditions in the workplace, the employer implements a change schedule for canisters and cartridges that is based on information or objective data that will ensure that canisters and cartridges are changed before the end of their service life. The employer shall describe in the respirator program the information and data relied upon and the basis for the change schedule and the basis for reliance on the data.

OSHA anticipates that some employers who perform the required evaluation will determine that air-purifying respirators (APRs) are appropriate for their circumstances. Others may prefer to provide powered-air purifying respirators (PAPRs). APR and PAPR cartridges also need to be changed out. See below on change-out information. Under some circumstances, other employers may determine that Supplied-Air Respirators (SARs) may be the only appropriate type of respirator for these hazards, especially in high-exposure industries like automotive painting.

Respirator Cartridges and Change-out Schedules

The Respiratory Protection standard, §1910.134, does not permit the use of warning properties as the sole basis for a cartridge change-out schedule. In addition, isocyanate-containing compounds do not have appropriate sensory warning properties. For atmospheres which are not IDLH, APRs are now considered acceptable as long as appropriate precautions and change-out schedules are in place. See §1910.134(d)(3)(iii)(B).

Currently, there are few respirator cartridges or canisters available on the market with ESLI, and none for isocyanates. An employer must select a cartridge or canister recommended for the chemical(s) against which the cartridge or canister is meant to protect employees. The employer must then implement a change schedule for the canister or cartridges that is based on objective information or data that will ensure that the canister and cartridges are changed before the end of their service life. The data relied upon and the information forming the basis of the determination must be included in the written respirator program. If more information becomes available, an employer would be expected to review and, if necessary, revise the change-out schedule. Further information on change out schedules may be found at http://www.osha.gov/SLTC/etools/respiratory/change_schedule.html.

The International Isocyanate Institute⁶ sponsored a study to determine the effectiveness of air-purifying respirator cartridges in removing MDI aerosols from air. They concluded that:

- Organic vapor cartridges without a particulate filter were not effective at removing MDI aerosols from air;
- Organic vapor cartridges with dust/mist (DM) or high efficiency (N100) filters effectively removed greater than 99% of MDI aerosol and vapor in all test atmospheres; and
- Formation of MDI aerosols was evident even at very low (<100ug/m³) total MDI concentrations.

Other PPE Information

Isocyanate vapors are corrosive and severely damaging to the eyes. Contact may cause permanent eye damage. If a half-mask respirator is selected, an employer would also be required under §1910.133(a)(1) to ensure that the employee uses appropriate eye and face protection.

Vapors of isocyanates may cause skin irritation and sensitization. The employer is required under Parts [1910 Subpart I](#) (General Industry), 1926 Subpart E (Construction), 1915 Subpart I (Shipyard), and 1918 Subpart J (Longshoring) to assess the workplace and select appropriate personal protective equipment. Additional personal protective equipment to protect the skin of the face and neck may be required if an employer elects respirators which leave these areas exposed.

Exposure to diisocyanates can cause various respiratory ailments. If an employee using an APR reports any medical signs or symptoms which could be attributed to isocyanate exposure, the employer must take appropriate action. Paragraph 1910.134(e)(7)(i) requires additional medical monitoring if an employee reports medical signs or symptoms related to the ability to use a respirator.

Employee Training on PPE

Personal protective equipment can be effective only if the equipment is selected based on its intended use; employees are trained in its use; and the equipment is properly tested, maintained, and worn.

Teaming the proper personal protective equipment with a good training program can give the worker a large measure of safety where other controls are inadequate or impossible. Train your employees to know:

- Why hand, arm, and body clothing, and respiratory protection are necessary – i.e., why isocyanates are a hazard that require skin and breathing protection;
- How the PPE will protect them;

⁶ Information on the International Isocyanate Institute, Inc. may be found at www.diisocyanates.org.

- The limitations of the protective equipment you have supplied;
- When a worker must wear the protective equipment;
- How to wear the protective gloves, sleeves, and clothing properly;
- How to ensure a comfortable and effective fit;
- How to identify signs of wear, such as cracks, scrapes or lacerations, thinning or discoloration, or break-through to the skin; and
- How to clean and disinfect reusable protective gloves, sleeves, body clothing, and respiratory protection.

Appendix H

General Guidance for Employers on Medical Surveillance Program Information for Worker Exposure to Isocyanates

A medical surveillance program for workers exposed to isocyanates should be developed, supervised and monitored by a physician who is Board Certified/Board Eligible in any of the following:

- Occupational Medicine
- Pulmonology/Pulmonary Medicine
- Internal Medicine
- Family Medicine
- Allergy and Immunology (especially if focused on asthma care)

General recommendations for an isocyanates medical surveillance program include⁷:

- Preplacement, annual and exit general medical examinations with:
 - Special emphasis on the respiratory tract
 - A medical history including an extensive work history, history of pre-existing respiratory conditions such as asthma, and a smoking history.
 - Spirometry (more information for employers and employees can be found on the [Spirometry Information sheet](http://www.osha.gov/Publications/osh3415.html) (<http://www.osha.gov/Publications/osh3415.html>) and [Spirometry Worker Information sheet](http://www.osha.gov/Publications/osh3418.html) (<http://www.osha.gov/Publications/osh3418.html>)).
- Workers with a history of respiratory conditions should be informed of the potential for increased health risks associated with exposure to isocyanates.
- Isocyanate-sensitized individuals should be assigned to work in areas where exposure to isocyanates is not expected.

Examples of medical surveillance programs:

1. Michigan State University's "Recommended Medical Screening Protocol for Workers Exposed to Occupational Allergens" <http://www.oem.msu.edu/userfiles/file/Resources/asthmaprotocol.pdf>
2. Asthma Initiative of Michigan's Recommended Medical Screening Protocol for People Exposed to Work-Related Allergens <http://www.getastmahelp.org/work-related-asthma-screening.aspx>

General Occupational Medicine Resources:

Association of Occupational and Environmental Clinics (AOEC) - <http://www.aoec.org/>

Workplace Health and Safety Queensland Designated Doctor Program: Isocyanate health surveillance guidelines: www.deir.qld.gov.au/workplace/resources/pdfs/ddp-isocyanateguide.pdf

⁷ These recommendations can be found at http://www.michigan.gov/documents/cis_wsh_cet5045_90179_7.doc