

# OSHA's New National Emphasis Program for Isocyanates

American Chemistry Council  
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## Information about OSHA's New National Emphasis Program for Isocyanates<sup>1</sup>

The Occupational Safety and Health Administration (OSHA) National Emphasis Program (NEP) for isocyanates was developed to focus OSHA resources on occupational exposure to isocyanates. The Isocyanates NEP will combine enforcement and outreach efforts to raise awareness of employers, workers, and safety and health professionals of the health effects associated with occupational exposure to isocyanates.

### Which industries are subject to inspection under the Isocyanates NEP?

OSHA stated that inspections under this NEP will target all workplaces under the jurisdiction of Federal OSHA, including general industry, construction and maritime industries where exposures to isocyanates are known or are likely to occur. Establishments with fewer than 10 workers will be included in this NEP. A list of relevant industries (by Standard Industrial Classification (SIC)/North American Industry Classification System (NAICS) codes) where isocyanates are to be used is in Appendix A of the NEP. Among the relevant industries are automotive, casting, building and construction, electricity and electronics, mechanical engineering, paints, plastics, printing, timber and furniture, textile, medical care, mining, and food industry.

### What is OSHA's goal for the Isocyanates NEP?

According to OSHA, the goal of this NEP is to reduce employee exposure to isocyanates that potentially cause work-related asthma, sensitization (respiratory, skin) and other occupational health effects. OSHA plans to accomplish this by a combined effort of inspection targeting, outreach to employers, and compliance assistance.

### What chemicals are covered by the Isocyanates NEP?

The NEP covers all isocyanates including methylene diphenyl diisocyanate (MDI), toluene diisocyanate (TDI), hexamethylene diisocyanate (HDI), methylene bis-cyclohexylisocyanate (HMDI) (hydrogenated MDI), isophorone diisocyanate (IPDI), naphthalene diisocyanate (NDI), HDI biuret, HDI isocyanurate, and methyl isocyanate (MIC).

### What is the expiration date for the Isocyanates NEP?

The Isocyanates NEP became effective on June 20, 2013. The Isocyanates NEP will expire three (3) years from the effective date in 2016 and supersedes regional and local emphasis programs specifically targeting occupational exposure to isocyanates.

### What are the anticipated inspection cycles?

OSHA Area Offices will create inspection cycles of five (5) or more establishments. Each OSHA Area Office is to 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.

<sup>1</sup> This information should not be viewed as the American Chemistry Council or industry's interpretation of federal statutory or regulatory requirements. If you need assistance with any interpretations, you should contact the agency involved or your own legal counsel.

### **What will OSHA inspect?**

OSHA will inspect the employer's 1) injury and illness records to determine if injuries and illnesses related to isocyanate exposures have been recorded, including any work-related cases of asthma, 2) controls (engineering controls, administrative and work practice controls, and personal protective equipment (PPE)) where potential exposures to isocyanates are present, 3) hazard communication program, 4) methods for ensuring adequate housekeeping, and 5) compliance where chemical components of an isocyanate process or operation contain flammable or combustible materials.

### **Can OSHA expand the scope of the inspection?**

The NEP states that an OSHA compliance officer 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 their attention.

### **What happens when OSHA receives a complaint?**

Complaints and referrals alleging worker exposures to isocyanates or involving workers with occupational asthma from isocyanates exposure or symptoms of exposure to isocyanates will be treated as having priority and handled by an inspection.

### **Are you exempt from inspections if you participate in an OSHA cooperative program?**

Employers participating in cooperative programs may be exempt from programmed inspections, but refer to the NEP for more information. Examples include OSHA's Voluntary Protection Program (VPP) and the Safety and Health Achievement Recognition Program (SHARP). Establishments engaged in OSHA Strategic Partnerships (OSP) may also be exempt from programmed inspection or may qualify for a focused inspection (or limited inspection), the scope of which should be specified in the partnership agreement.

### **What is ACC's response to the Isocyanates NEP?**

The isocyanates and polyurethanes industries are strongly committed to supporting the continued safe and responsible use of their products. These industries undertake extensive programs to educate and provide information about safety precautions to protect workers and consumer health and to provide information to help users of isocyanates comply with all regulations. Our organizations work with the value chains and provide extensive resources, including training opportunities, guidance documents and videos, and professional development courses for example, that can help facilities comply with OSHA requirements. We also partnered with OSHA in the past on worker safety efforts. The industry will continue to lead worker safety and product stewardship efforts and coordinate with OSHA on worker safety initiatives.

### **Where do I get additional information?**

OSHA's NEP on isocyanates is available at [http://www.osha.gov/OshDoc/Directive\\_pdf/CPL\\_03-00-017.pdf](http://www.osha.gov/OshDoc/Directive_pdf/CPL_03-00-017.pdf). For more information, contact Sahar Osman-Sypher, Director of the Diisocyanates and Aliphatic Diisocyanates Panels at ACC ([Sahar\\_Osman-Sypher@americanchemistry.com](mailto:Sahar_Osman-Sypher@americanchemistry.com), 202-249-6721), or Lee Salamone, Senior Director of the Center for the Polyurethanes Industry at ACC ([Lee\\_Salamone@americanchemistry.com](mailto:Lee_Salamone@americanchemistry.com), 202-249-6604).

ACC Diisocyanates Panel: [www.americanchemistry.com/dii](http://www.americanchemistry.com/dii)

ACC Aliphatic Diisocyanates Panel: [www.americanchemistry.com/adi](http://www.americanchemistry.com/adi)

ACC Center for the Polyurethanes Industry: [www.polyurethane.org](http://www.polyurethane.org)