

# UTAH OSHA SAFETY LINE

NEWSLETTER



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## ISOCYANATES IN THE WORKPLACE

Isocyanates are a family of highly reactive, low molecular weight chemicals that many employees are exposed to on a daily basis. Isocyanates can be found in paints, varnishes, flexible and rigid foams, elastomers, auto body repair materials, and building insulation materials. Isocyanates are the raw materials that make up all polyurethane products. The main effects of hazardous exposures are occupational asthma and other lung problems, as well as irritation of the eyes, nose, throat, and skin. Isocyanates include compounds classified as potential human carcinogens and known to cause cancer in animals.

Workers in many different 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 fifteen 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 sometime fatal. Exposure to Isocyanates is not limited to inhalation alone; employees can also be exposed through dermal contact.

Because of the high instances of occupational asthma, and the multiple exposures to Isocyanates by employees in a variety of occupations, OSHA has announced a new National Emphasis Program on Occupational Exposure to Isocyanates. This emphasis program includes outreach to those employers and employees most likely to be exposed to Isocyanates. Utah OSHA is adopting this National Emphasis Program and will begin the educational outreach portion of this emphasis immediately and will begin the enforcement portion of the emphasis in January 2014.

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Education is the first step in protecting your workers, or yourself, from exposure to Isocyanates. It is very important to know if any products in use in your workplace contain Isocyanates. Be on the lookout, your Material Safety Data Sheet (MSDS) may not contain the word Isocyanate. Some of the common names for Isocyanates include; Toluene Diisocyanate (TDI), Napthalene Diisocyanate (NDI), Polymethylene Polyphenyl Isocyanates (PAPI), Hexamethylene Polyphenyl Isocyanates (HDI), Methylenediphenyl Diisocyanate (MDI), Isophorone Diisocyanate (IPDI), and Polyisocyanate. Some trade names of Isocyanates are; POR, Centari, Macconate, Mondur, Imron, Hylene, Niax, Desmodur, Isonate, Rubinate. Always read the MSDS, and pay special attention to the Personal Protection Equipment portion for proper

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*Working together we can make the beautiful State of Utah a safer place to work, elevating our workplace safety and health culture to a higher level of excellence.*

[uosh.utah.gov](http://uosh.utah.gov)

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guidance.

Small employers in the State of Utah are eligible for assistance from the Utah OSHA Consultation Division at no cost, without citations or penalties. The Consultation Program can assist you in identifying Isocyanate exposures in your workplace, and can assist in finding solutions to limit the exposure to your employees. For assistance please call 801-530-6855.

More information on Isocyanates can be found at the following links:

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

<https://www.osha.gov/SLTC/isocyanates/>



## Lower Your Needlestick Injuries by Using Blunt End Suture Needles

Needlestick injuries are a common occurrence in the health care industry. Needlestick injuries have the potential to expose health care personnel to bloodborne viruses, such as the Hepatitis B Virus (HBV), Hepatitis C Virus (HCV), and Human Immunodeficiency Virus (HIV). It is estimated that 384,000 needlestick injuries occur in hospitals each year, and published studies indicate that these numbers are decreasing. The overall numbers may be decreasing, but not in the surgical settings where approximately twenty-three percent of needlesticks occur.

OSHA, the National Institute of Occupational Safety and Health (NIOSH), and the Food and Drug Administration (FDA) strongly encourage health care professionals to use blunt-tip suture needles as an alternative to standard suture needles when suturing fascia and muscle to decrease the risk of needlestick injury. Published studies show that using blunt-tip suture needles reduces the risk of needlestick injuries from suture needles by sixty-nine percent. Although the blunt-end suture needles currently cost seventy cents more than their standard suture counterparts, the benefits of reducing the risk of serious and potentially fatal bloodborne infections for health care personnel support their use when clinically appropriate.

Click on this link to obtain additional information on this subject:

<http://www.fda.gov/MedicalDevices/Safety/AlertsandNotices/ucm305757.htm>

## GHS IS RAPIDLY APPROACHING

OSHA has modernized the Hazard Communication Standard to adopt The Globally Harmonized System (GHS) to improve safety and health of workers through more effective communications on chemical hazards in the workplace. Adoption of this standard will help to improve information received from other countries in regards to labeling, hazard classifications, and pictograms. While most of the new standard will not be fully implemented until June 1, 2015, employers are required to train their employees on the new label elements, and safety data sheet formats, by December 1, 2013. Information to assist you in this training is attached to this newsletter. If you have any further questions regarding this requirement, please contact Utah OSHA at 801-530-6900.



# Compliance Corner

Our office receives many calls regarding access to toilet facilities in the workplace. So many, in fact, that I would like to take this month's Compliance Corner to flush out the answer to many of these questions (pun intended).

Access to toilet facilities may be something that you never had considered as part of workplace safety and health, however, there are medical conditions that may precipitate frequent visits to the restroom, and there are medical conditions that could arise because of the lack readily available toilets. Medical studies show the importance of regular urination, with women generally needing to void more frequently than men. Adverse health effects that may result from voluntary urinary retention include increased frequency or urinary tract infections (UTI's), which can lead to more serious infections and, in rare situations, renal damage. Medical evidence also shows that health problems, including constipation, abdominal pain, diverticuli, and other health problems can result if individuals delay defecation. Ok, now let's get to the bottom of this matter.

The language and structure of the general industry sanitation standard reflect OSHA's intent that employees be able to use toilet facilities promptly. OSHA requires that toilet facilities must be **provided** so that employees can use them when they need to do so. The definition of "provide" is to "make available" (Webster's New World Dictionary, Third College Edition). Court cases have further defined "provide" as "to furnish, supply, or make available." OSHA's general industry standard 29 CFR 1910.141(c)(1)(i) states: Except as otherwise indicated in this paragraph (c)(1)(i), toilet facilities, in toilet rooms separate for each sex, shall be provided in all places of employment in accordance with table J-1 of this section. The number of facilities to be provided for each sex shall be based on the number of employees of that sex for whom the facilities are furnished. Where toilet rooms will be occupied by no more than one person at a time, can be locked from the inside, and contain at least one water closet, separate toilet rooms for each sex need not be provided. Where such single-occupancy rooms have more than one toilet facility, only one such facility in each toilet room shall be counted for the purpose of table J-1.

<b>Table J-1</b>	
<b>Number of employees</b>	<b>Minimum number of water closets<sup>1</sup></b>
1 to 15	1
16 to 35	2
36 to 55	3
56 to 80	4
81 to 110	5
111 to 150	6
Over 150	( <sup>2</sup> )

<sup>1</sup>Where toilet facilities will not be used by women, urinals may be provided instead of water closets, except that the number of water closets in such cases shall not be reduced to less than 2/3 of the minimum specified.

<sup>2</sup>1 additional fixture for each additional 40 employees.

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The standard continues in 29 CFR 1910.141(c)(1)(ii) and states: The requirements of paragraph (c)(1)(i) of this section do not apply to mobile crews or to normally unattended work locations so long as employees working at these locations have transportation immediately available to nearby toilet facilities which meet the other requirements of this subparagraph.

Thus employees who are members of mobile crews, or who work at normally unattended locations must be able to leave their work location "immediately" for a "nearby" toilet facility. This provision was obviously intended to provide these employees with protection equivalent to that the general provision provides to employees at fixed worksites. Read together, the two provisions make clear that all employees must have prompt access to toilet facilities.

The construction standard for toilet facilities 29 CFR 1926.51(c) states:

(1) Toilets shall be provided for employees according to the following table:

Table D-1	
Number of Employees	Minimum number of facilities
20 or less	1
20 or more	1 toilet seat and 1 urinal per 40 workers
200 or more	1 toilet seat and 1 urinal per 50 workers

(2) Under temporary field conditions, provisions shall be made to assure not less than one toilet facility is available.

(3) Job sites, not provided with a sanitary sewer, shall be provided with one of the following toilet facilities unless prohibited by local codes:

- (i) Privies (where their use will not contaminate ground or surface water);
- (ii) Chemical toilets;
- (iii) Recirculating toilets;
- (iv) Combustion toilets.

(4) The requirements of this paragraph (c) for sanitation facilities shall not apply to mobile crews having transportation readily available to nearby toilet facilities.

OSHA has made it clear in several letters of interpretation that access to toilet facilities must be readily available for all employees. OSHA has been criticized for these regulations and OSHA letters of interpretation because some managers/owners/employers are concerned that it makes it impossible to police abuses by employees who say they have to go to the restroom but are really faking and just want to loaf. In a letter of interpretation dated April 23, 2003 OSHA responded to these concerns and stated that previous interpretations and the applicable standards should not be seen as interfering with management's right/ability to discipline workers who are violating legitimate work rules. OSHA continues this response stating that an employer is not prohibited from having reasonable restrictions on access to toilet facilities. Formal complaints received by UOSH will be judged on a case by case basis, and all such cases will be judged on its own merit.