



# Education & Training Committee

January 2014

Palm Springs, California

# Committee Members

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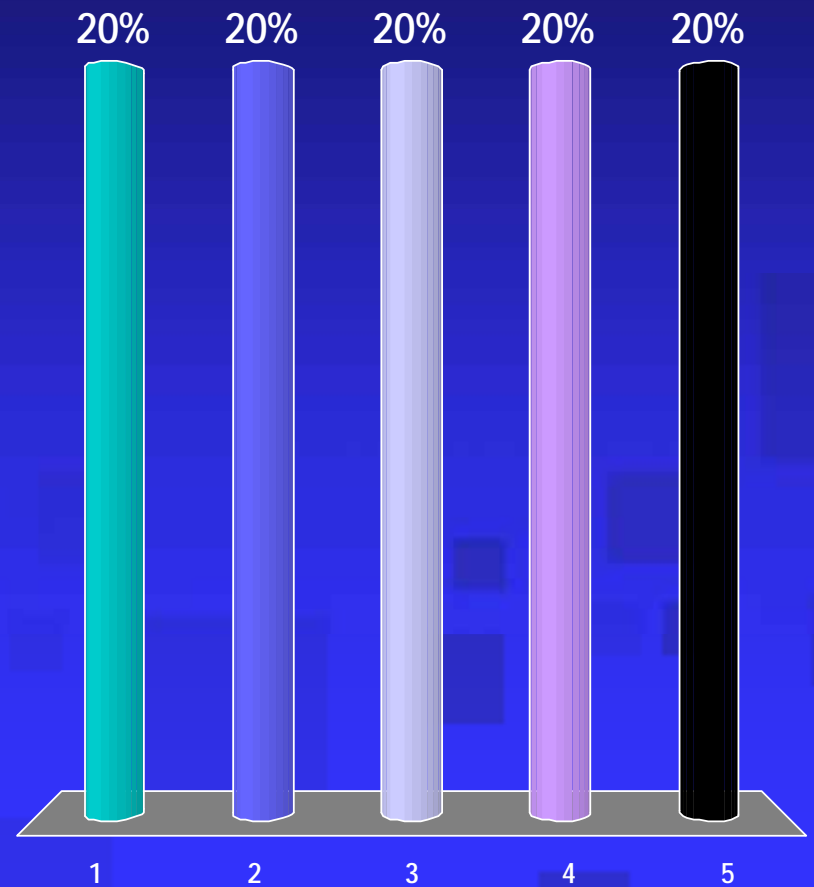
Gene	Lopez	I-CAR
Bob	Keith	CARSTAR
John	Bosin	Akzo Nobel
Dominic	Brusco	PPG Industries
Rod	Enlow	CCAR
Jim	Evans	Axalta
Fred	Iantorno	CIECA
Jeff	Peevy	I-CAR
Tony	Molla	ASE
Richard	Perry	Chief Automotive Systems
Jeanne	Silver	CARSTAR Mundelein
Rick	Tuuri	AudaExplore, a Solera Company
Rudy	Aranda	I-CAR

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# Please indicate which stakeholder group you represent.

1. Repairer
2. Insurance
3. OEM
4. Supplier
5. Salvage
6. Consultant
7. Education
8. Associations
9. Other

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# Isocyanate Emphasis Program

- OSHA announced NEP in June of 2013
- Goals:
  - Focus inspections on specific industries for 3 years
  - Strengthen protections for workers exposed to isocyanates
  - Reduce occupational illnesses and deaths



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# Overview of Isocyanates

- Highly reactive, low molecular weight chemicals
- Linked to respiratory disease in workers since 1950s
- Potential links to cancer in humans
- Known to cause cancer in animals



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# Isocyanates = Powerful Irritants

## Respiratory Tract

- Bronchitis
- Bronchospasm
- Pneumonitis
- Asthma
- Allergic Sensitizers

## Mucous Membranes

- Dermal Sensitization
- Rash
- Itching
- Hives
- Swelling of Extremities



# Isocyanate Sensitization

- Can occur at very low levels of exposure
- Very difficult to wash off skin or clothing
- Preventing exposure is the critical step in eliminating the health hazard
  - Spray booths
  - Prep stations
  - Ventilation
  - PPE



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# Isocyanates in the Body Shop

- Predominantly in clear coats, but may be in all aspects of paint process
  - Hexamethylene diisocyanate (HDI)
  - Isophorone diisocyanate (IPDI)
- Exposures:
  - Mixing and spraying
  - Gun cleaning
  - Contact with un-cured contaminated surfaces



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# OSHA Enforcement

- Automotive confirmed as a primary target for NEP
- Enforcement Selection for OSHA's Area Offices:
  - Master List tied to any business with 1+ employees
  - Each shop assigned a sequential number
  - Targets are selected at random
  - Must complete 3 inspections per year in each area
  - Can complete more inspections based on findings at other establishments



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# OSHA Audit

- Opening Conference with Owner
  - Review Chemical Inventory and Safety Data Sheets
  - Review Hazard Assessment & PPE Processes/Training
- Recordkeeping
  - OSHA 300 Logs (5 years)
  - Review of worker's medical records
  - Worker interviews looking for potential unreported occupational illnesses



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# OSHA Audit

- Worker Interview Questions
  - What PPE do you use when working or in the work area (respirator, gloves, eye protection, protective clothing)?
  - Has a doctor told you that you had asthma?
  - Do any of the following occur at work? Do they improve when you are on vacation or on the weekend?
    - Cough, Wheezing, Watery Eyes, Stuffiness, Skin Rash, Shortness of Breath, Chest Tightness, Fever



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# OSHA Audit

- Review of Employer Controls
  - Engineering Controls (booth, mix room, etc.)
  - Personal Protective Equipment
- Air Sampling
- Wipe Sampling
  - Surfaces (tools, drinking fountains, locker rooms, etc.)
  - Dermal/Skin Testing
  - PPE Sampling (gloves, shoot suits)



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# OSHA Audit

- Inspections can go anywhere, not limited to isocyanates
  - Hazard Communication
  - Housekeeping
  - Flammable & Combustible Products
- Follow-Up Inspections or Hazard Alert Letter (HAL)
  - Within 12-24 months of initial inspection
  - Must document all corrective action to verify workers are no longer exposed to isocyanates



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# OSHA Citation Guidelines

- “Serious” Citations for the following:
  - Isocyanate Exposure in Excess of OSHA Limits
  - Lack of Feasible Engineering or Admin Controls
  - Improper Personal Hygiene for Isocyanate Absorption
  - Not Using, Misusing, or Ineffective PPE
  - Lack of an Adequate Hazard Communication Program
- “Serious” Citation - \$5,000 average fine historically



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Which of the following makes a shop exempt from an OSHA inspection tied to the NEP on Isocyanates?

- A. Less than 10 employees
- B. Spraying water-based paint
- C. Already exempt from 6H-NESHAP
- D. All of the Above
- E. None of the Above



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Questions?