



Formaldehyde Panel

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## COMPLIANCE WITH PPE REQUIREMENTS IS REQUIRED BY OSHA

Workers with Potential Exposure  
to Formaldehyde Are Protected  
Under Strict OSHA Standards

The Occupational Safety and Health Administration (OSHA) requires that employers protect their employees from workplace hazards. Personal Protective Equipment (PPE) is integral to workplace health and safety in the formaldehyde industry and is required for workers producing formaldehyde.<sup>1</sup> PPE and other means of worker protections are mandated by the formaldehyde industry.

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<sup>1</sup> <https://www.osha.gov/enforcement/directives/cpl-02-02-052>

## Proper PPE and Safety Equipment: Not One-Size-Protects-All

Protecting workers from potential exposure to formaldehyde is an important part of a company's health and safety program. It is just as important to a successful workplace safety strategy as protecting from slips/falls, cuts and lacerations and falling objects. In addition to protections afforded by engineering, work practices, and administrative controls, employers implement a comprehensive respiratory protection program that includes the proper use of PPE. PPE is not one-size-protects-all. Employers select appropriate PPE after a detailed assessment of workplace conditions with an emphasis on potential exposure scenarios and routes of exposure. PPE is then matched to the identified hazards via a thorough certification process and reference to OSHA's assigned protection factors.<sup>2</sup> To provide protection for employees in the workplace, employers are responsible for:

- ✓ Performing a "hazard assessment" of the workplace to identify physical and health hazards;
- ✓ Mitigating exposures to identified hazards through feasible engineering and administrative controls.
- ✓ Identifying and providing appropriate PPE for employees, when necessary;
- ✓ Training employees in the use and care of PPE including when and what PPE is necessary for each job task, how to properly put on, take off, adjust and wear PPE, the efficacy of PPE, and proper care, maintenance, useful life and disposal of PPE;
- ✓ Periodically reviewing, updating, and evaluating the effectiveness of the PPE program.<sup>3</sup>

## Committed to Worker Health and Safety

The chemical industry is committed to protecting the health and safety of its workers. Formaldehyde panel companies that are members of ACC participate in Responsible Care®, the chemical industry's world-class environmental, health, safety and security performance initiative. Companies that participate in Responsible Care annually report their progress on a variety of process safety and worker safety performance measures, which ACC makes publicly available online. Repeated studies have shown that successful organizations view safety as a key element in the pursuit of operational excellence.<sup>4</sup>

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1 <https://www.osha.gov/enforcement/directives/cpl-02-02-052>  
 2 <https://www.osha.gov/sites/default/files/publications/3352-APF-respirators.pdf>  
 3 <https://www.osha.gov/sites/default/files/publications/osh3151.pdf>  
 4 Workplace\_Health\_and\_the\_Bottom\_Line.pdf  
 5 <https://www.osha.gov/businesscase/benefits>

## OSHA Formaldehyde Standard

The OSHA Formaldehyde standard (29 CFR 1910.1048), and regulations in states with OSHA-approved state plans, protect workers that may potentially be exposed to formaldehyde and applies to all occupational exposures to formaldehyde gas, liquids that contain formaldehyde, and materials that may release formaldehyde. OSHA requires employers to monitor, retain and allow employee access to medical and exposure records.

- 01 The standard includes a short-term exposure limit (STEL) of 2 ppm which is the maximum exposure allowed during a 15-minute period. Employers are required to identify all workers who may be exposed to formaldehyde at or above the STEL through monitoring and determine their exposure.
- 02 The action level – which is the standard's trigger for increased industrial hygiene monitoring and initiation of worker medical surveillance – is 0.5 ppm when calculated as an 8-hour TWA.
- 03 The permissible exposure limit (PEL) for formaldehyde in the workplace is 0.75 parts formaldehyde per million parts of air (0.75 ppm) measured as an 8-hour time-weighted average (TWA).
- 04 Employers are required to implement feasible engineering and work practice controls, including PPE, to reduce and maintain worker exposure to formaldehyde at or below the 8-hour TWA and the STEL. If these controls cannot reduce exposure to or below the PELs, employers must implement a comprehensive respiratory protection program than includes use of respirators.<sup>5</sup>

## Formaldehyde TSCA Risk Evaluation

TSCA requires that the formaldehyde TSCA risk evaluation is based on the best available science and the weight of the scientific evidence. It is critical that EPA and policymakers understand that workers are adequately protected under OSHA's worker protection standards. The formaldehyde industry is committed to protecting the health and safety of all its workers and to provide a workplace, free from hazards and compliant with occupational safety standards, rules, and regulations issued under OSHA and other government agencies.

## Examples of PPE:

- ✓ **Hard Hat**
- ✓ **Full Face Respirator**
- ✓ **Impervious Smock Type Apron with Long Sleeves**
- ✓ **Sturdy Leather Footwear with Compressed Toe**

## Formaldehyde - Typical Tasks

Appropriate PPE is determined based on an assessment of workplace conditions and may vary. The chart below provides examples of available PPE, which may not be required in all situations.



TASK	HEAD		EYE			BODY			FOOTWEAR		GLOVES			RESPIRATOR		MISCELLANEOUS		
	Hard Hat	Sealed Safety Glasses	Goggles	Faceshield	Full Face Respirator	Basic Work Clothing	Impervious Jacket and Pants	Impervious Smock Type Apron w/ Long Sleeves	Sturdy Leather Footwear - Compression Toe	Impervious	Impervious	Leather	Nitrile (disposable)	Dust Mask	Full Face Respirator	Thermal Coolign Vest	Hearing Protection	Fall Protection Equipment
FM - Railcar Bottom Offloading	•				•			•	•						•			
FM - Railcar Partial Bottom Offloading	•				•		•		•						•	•		
FM - Railcar Top Loading	•				•	•		•	•						•			•
FM - Tank Truck Top Loading	•				•	•		•	•						•			
FM Sampling Process Under Pressure	•				•			•	•						•			
FM Sampling Storage Tanks	•		•	•		•			•						•			
FM Sampling - Railcar or Tank Truck Dip Samples	•				•	•		•	•						•			
FM Analytical Testing	•	•				•			•				•					
Formaldehyde First Break Non-Routine	•				•		•		•						•	•	•	•
Hand Hose from Hot Water from Steam Mixing Station		•				•		•	•						•			
Methocel Stabilizer Blending Handling		•		•		•		•	•					•				
Changing Nitrogen Skid		•		•		•			•			•						
Changing FM Filter Elements	•				•			•	•					•				

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