

Our strengths. Your gains.

PMA Advocacy Committee

## Frequently Asked Questions

### **MBOCA Urinalysis FAQ**

- 1) Who should be doing urinalysis?** All companies who have employees who use and/or handle MBOCA or work in the area where MBOCA is processed.
  
- 2) How often?** Ideally, quarterly or at least twice a year. MBOCA does not accumulate in the body and is excreted via the urine in 2 to 3 days. Therefore, each sample represents a snap shot of recent exposure. Regular testing on a quarterly basis provides a more accurate measure of exposure and maintains awareness of safety protocols.
  
- 3) Wouldn't it just be easier to switch to another cure system because MBOCA is a possible carcinogen?** Changing curative systems may be a viable alternative. However, for many applications MBOCA cure systems have advantages in cost, material properties, or processing parameters. Also, MBOCA is not necessarily more harmful than other substitute materials. We know how to use it safely and there is a very simple test to verify safe usage.
  
- 4) Is my company required by law to conduct urinalysis if we are using MBOCA?** No, but you should anyway. Federal OSHA does not require urinalysis but several states, such as California and provinces in Canada, do require this testing. Providing this additional safety measure to your employees demonstrates a commitment to providing the safest possible workplaces. We understand that Japanese processors and some European processors also conduct urinalysis. The PMA has more than 40 years of urinalysis monitoring data which supports the safe use practices. Urinalysis testing is a well-established industry practice and the 100 ug/liter action limit is an industry standard. A well-established practice and industry standard often forms the basis for a negligence standard in third party lawsuits. Operating above this standard subjects the company and perhaps its managers and owners in closely-held businesses to greater liability exposure.
  
- 5) How do we get the test?** The PMA has partnered with Colormetric Laboratories Inc. (CLI) to make this service available for over 25 years. CLI provides all the testing supplies and reports directly to your facility for every month you are scheduled to test. Tom Klingerner, Colormetrics Laboratories Incorporated (CLI), 1261A Rand Road, Des Plaines, Il. 60016, (708) 696-3036.
  
- 6) How much does it cost?** The current price is less than \$70 per sample.
  
- 7) How do we know the results are accurate?** CLI's methodology has been evaluated and adopted by NIOSH as an agency official test method.

**8) What if my employees don't want to take the test?** Often employees are initially concerned that they will be drug tested during this urinalysis. The sample is evaluated for MOCA exposure only. Any other use is illegal. In time, you can build trust to show them that you are using the test only to ensure protection of their health.

**9) If the results are higher than recommended, will my company be sued for exposing employees to MBOCA in the past?** The adopted standard of 100ug/liter of urine is reflective of good workplace practices and is not related to any health concern. This is a conservative, but very achievable standard. Not knowing and documenting exposure potentially leaves a company more at risk.

**10) If the results are high, will it be prohibitively expensive to make changes?** If the results are high, will it be prohibitively expensive to make changes? Nearly always improvement can be made through simple process changes like cleaning work surfaces differently, changing gloves or other PPE more frequently, or washing hands before eating or smoking. Often improving personal hygiene and improving cleanup of the work surfaces will reduce an employee exposure.

Sometimes an equipment change, like using a MBOCA melter instead of heating MBOCA on a stove, can reduce MBOCA exposure while also improving process efficiency.

**11) What if we are unable to figure out how to reduce our exposure levels?** What if we are unable to figure out how to reduce our exposure levels? Historically over 95% of samples are below the 100 ug/liter action limit. Workers exceeding the action level can normally demonstrate improvement through simple work changes. You are welcome to contact the PMA office to match you with a supplier or peer mentor who can help you make changes.

**12) Why do we talk about MBOCA so much when not everyone in the PMA uses MBOCA?** Why do we talk about MBOCA so much when not everyone in the PMA uses MBOCA? PMA represents a very large portion of the MBOCA processing market: approximately 40%. If a standard is written, we would like to have input to the rule making process. By demonstrating our industry and its use of chemicals is self-regulating and effective, this effort may preclude the "necessity" of making a rule. If a rule is made, our industry standards may be adopted as the regulation; provided that we can demonstrate that the procedures of surveillance monitoring are effective.

**13) What about our other chemicals?** What about our other chemicals? The PMA and its member companies are committed to using ALL our industry chemicals safely and keeping them all available for use. We use a variety of approaches to work toward these goals. Isocyanates for example, while a high percentage of PMA members use them, we represent a sliver of the total market. In this case, we are partnering with the ACC to have a voice in future regulation decisions.

**Summary comments:** Processors all over the world and particularly in Japan, Europe, the USA and Australia conduct urinalysis surveillance monitoring of their employees and as a means of determining the effectiveness of our protective controls. If a high percentage of PMA processor members participate in urinalysis testing and surveillance monitoring this may prevent development of an OSHA standard and it may have a positive effect on the TSCA risk analysis for MOCA.