

Study on MOCA Handling Practices of PMA Members Released

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On August 31, 2009, Dr. Ted Hogan and his research team at Benedictine University released their report of the recently completed PMA study on the MOCA handling practices of PMA members. The full report is available on the PMA website at the following address: www.pmahome.org.

The primary goal of the PMA study was to determine whether voluntary work practice guidelines contained in the PMA's MOCA Use Guidance document resulted in lower workplace exposures to MOCA. The researchers compared PMA member responses to a comprehensive survey regarding MOCA work practices with historical urinalysis data collected by PMA members to see if a link could be established between implementation of the voluntary practices and lower exposures. Although a direct link could not be established between implementation of the guidelines and lower exposures, there were two major findings of the study. First, although the study documented several facilities that are doing an excellent job following the MOCA Use Guidance document guidelines, it also documented that some of the best practices outlined in the MOCA Use Guidance document are not being consistently followed by all facilities (i.e., ventilation and spill procedures). Second, even though some of the guidelines are not being followed, exposures to MOCA were generally low, with only 3% of monitored employees exceeding the PMA exposure recommendation of 100 ug/L.

The PMA study comes on the heels of a study on the exposure to MOCA in the British polyurethane industry, which generally documented poor housekeeping practices but nevertheless found that actual employee exposures were also low. That study also documented tracking of MOCA to areas of facilities where MOCA was not handled, further underscoring the need for better handling practices to further reduce employee exposures. The major conclusion of the British study was that British occupational exposure limits should be lowered to act as a stimulus for employers to further reduce exposures to MOCA. It is interesting to note that the 90th percentile of the 2008 PMA member urinalysis results were approximately 30% lower than the 90th percentile exposures documented in the British study, suggesting that the voluntary practices employed by PMA members yields a better level of protection than the regulatory approach employed in Great Britain.

The good news from both the British and the PMA studies is that actual exposures to MOCA among polyurethane processing employees is low, but there is ample opportunity to improve safe work practices to reduce exposures even further without resorting to the need for U.S. regulatory agencies to lower exposure limits. Accordingly, it is imperative that PMA members evaluate and improve their housekeeping procedures immediately in an attempt to head off any effort to lower MOCA exposure limits in the U.S.

One key recommendation of the PMA study is that the MOCA Use Guidance document should be updated to reflect the study findings and to address changes in technology that have the potential to reduce MOCA exposures. It is expected that further discussions regarding the PMA study and implementation of recommendations will take place at the annual PMA meeting. Please look for future editions of PolyTopics for updates on this issue.

If there is a regulatory issue in your area, please do not hesitate to contact either Regulatory Affairs Division Manager Mike Kocak at 724-772-5225/mikek@cumi-kek.com or PMA's legal counsel Don Gallo at 262-951-4555/dgallo@reinhartlaw.com.