



Recently, questions have come up regarding whether the use of solutions containing low levels of formaldehyde would trigger the employee monitoring requirements under the Formaldehyde standard. Below is a summary of the Formaldehyde standard that you may find helpful in determining your obligations under this standard.

Highlights of the Formaldehyde Standard (29 CFR 1910.1048)

Appendix B “Sampling Strategy and Analytical Methods for Formaldehyde” identifies “(4) Any process that uses formaldehyde in preserved tissue,” as a work operation where “there may be a potential for releasing formaldehyde into the workplace atmosphere.”

Employee Monitoring

- The employer must monitor employees for their exposure to formaldehyde, unless the employer has objective data that its use of formaldehyde will not exceed the Action Level of 0.5 parts per million (ppm) calculated as an 8-hour time weighted average (TWA) or the Short Term Exposure Limit (STEL) of 2 ppm over a 15 minute time interval. §1910.1048(d) *Exposure Monitoring*
- The initial monitoring process shall be repeated each time there is a change in production, equipment, process, personnel or control measures which may result in new or additional exposure to formaldehyde. §1910.1048(d)(2)(ii)
- If the employer receives reports of signs or symptoms of respiratory or dermal conditions associated with formaldehyde exposure, the employer shall promptly monitor the affected employee’s exposure. §1910.1048(d)(2)(iii)
- Periodic monitoring is required for employees shown to be at or above the Action Level or STEL. §1910.1048(d)(3)(i)

Personal Protective Equipment

- The employer shall select protective clothing and equipment based upon the form of formaldehyde to be encountered, the conditions of use and the hazard to be prevented. §1910.1048(h)(1)
- If there is any possibility that an employee’s eyes may be splashed with solutions containing 0.1 percent or greater formaldehyde, the employer shall provide acceptable eyewash facilities within the immediate work area for emergency use. §1910.1048(i)(3)

Medical Surveillance

- The employer shall institute medical surveillance programs for all employees exposed to formaldehyde at or exceeding the Action Level, or exceeding the STEL. §1910.1048(l)

Hazard Communication and Training

- The employer must communicate to employees the hazards associated with formaldehyde including solutions composed of greater than 0.1 percent formaldehyde or materials capable of releasing formaldehyde into the air at concentrations reaching or exceeding 0.1 ppm. *§1910.1048(m)(1)(i)*
- The specific health hazards that must be addressed at a minimum are: Cancer, irritation and sensitization of the skin and respiratory system, eye and throat irritation, and acute toxicity. *§1910.1048(m)(1)(ii)*
- Employee information and training is required annually unless the employer has objective data that employees are not exposed to formaldehyde at or above 0.1 ppm. Information and training must be provided at the time of initial assignment and whenever a new exposure to formaldehyde is introduced into the work area. *§1910.1048(n)*