



## OVERSPRAY CONTROL POLICY

Spray Foam Contractors continue to have a number of overspray incidents each year. In our review of this situation, the Safety Committee has found that a wide variety of strategies, i.e. parking control, car covers, etc. are being used by our member contractors around the country. The purpose of this memo is to help you create a consistent and successful policy for dealing with the "overspray issue".

It is important that you take a very pro-active approach to this situation. You will need to partner with your clients to create a successful solution. The first step in this process will be for your salesperson/estimator to identify the scope of the overspray hazard. You must then evaluate the level of risk and adopt one or more of the following strategies in order to deal effectively with this issue.

Plan A - The overspray issue is handled as a part of the proposal/contract procurement process.

Plan B - Following the receipt of a contract, the overspray issue is addressed in a separate meeting/contact with the client. There are often other issues that need to be addressed at this point in the process such as protecting the building occupants from vapors, work permits, etc.

Plan C - The issue is addressed at the pre-job meeting.

Plan D - There is no overspray hazard.

Plans A, B, and C should result in the creation of an Overspray Abatement Plan (see the attached sample form). An informational letter, such as the attached "Spray Foam and Overspray", should be included in a "client hazard information" package together with MSDS forms and other safety information. Ideally, your representative should sit down with the Client and review the information in these two documents in a positive and pro-active atmosphere. Together, you should decide which of the options listed on the Overspray Abatement Form are best suited to the particular situation. If at all possible, both parties should sign the Overspray Abatement Form.

Once an Overspray Abatement Plan has been adopted, your on-site supervisor will have the primary responsibility for seeing that it is carried out. While getting parking lots closed, cars moved or covered, and masking windows, doors, floors, etc., or changing work areas to suit conditions are time consuming and often frustrating tasks for goal-oriented production supervisors; remember that it is always less expensive to avoid an incident than to deal with the consequences of one.

It is important for both parties to understand that each has an obligation to advise vehicle owners of the potential problem and that you will try to do what you can, within reason, to abate the problem. If you have done this you will have reduced your liability if an overspray



incident occurs and you will have created a climate in which a more reasonable solution can be worked out.

An important part of this pro-active approach is to find a qualified firm with a demonstrated ability to clean foam overspray off of cars before you need them. This will more than likely be a "detailing" shop and not a shop whose primary business is painting cars. Get them to view your company as a long-term (if, hopefully, infrequent) partner and not as a "fast buck" opportunity.

You may also wish to stock your trailer or truck with several kits of the "magic clay" type cleaner. If an overspray incident is brought to your attention, your employees can clean foam residue off auto glass safely using this product. Be very cautious, however, about having your employees attempt to clean painted surfaces unless they are capable and experienced with these clay products.

When an overspray incident does occur, your employees at the site should be trained to have two conditioned responses:

Response No. 1 - Your employees at all levels should be trained to be polite and responsive to any claimant. Avoid confrontation and respond to their questions in a positive way, assuring them of a prompt referral to management.

Response No. 2 - Your employees should be clear on whom to notify within your company when an incident occurs – either a supervisor on site or manager at the office. In either case, management should address the problem and not run from it. A claimant who is ignored will quickly become angry, more expensive to deal with, and a public (and customer) relations disaster.

No one likes dealing with overspray, but you will get, by far, the best results if you remain positive, informative and creative.

Attachments:

1. Overspray Information Letter
2. Overspray Abatement Form
3. Overspray Incident Report Form



## SPRAY FOAM ROOFING AND OVERSPRAY

\_\_\_\_\_ will be installing a sprayed-in-place polyurethane foam system at your facility during the period of \_\_\_\_\_ to \_\_\_\_\_. This system is composed of polyurethane foam, which is formed by combining an "A" side (di-isocyanate), and a "B" side (polyol). This foam is the same material used to insulate your refrigerator, your Coleman cooler, to make foam rubber seat cushions, furniture, and even pillows. This product is all around us. Fully reacted polyurethane foam is not considered a hazardous material under OSHA's Hazard Communications Standard (29 CFR 1910.1200).

Although we take precautions to avoid it, it is possible for small particles to drift in the wind and land on cars in the immediate vicinity of the spraying operation. If the overspray has not dried before this happens, it may develop some adhesion to glass and paint. Since the particles are extremely small, soft, and sensitive to ultraviolet radiation, they will weather off. Normal washing can facilitate this process. Do not try to remove the particles with rubbing compound or by buffing. Do not wax or seal the surface, as this will protect the foam from the weathering process. If allowed to weather off, the foam overspray will disappear completely with no residual effects whatsoever. It is different from paint overspray in this regard. This process will take several weeks, depending on such factors as the amount of sunshine your car receives, overspray particle size and to some extent how often the car is washed.

The first step in the weathering off process is that the foam starts to turn yellow and brown as it oxidizes. With less sun, such as occurs in winter or foggy conditions, it will take longer for the foam to disappear but it will disappear, so please be patient.

If you detect foam overspray on your windshield (your windshield wiper blades will sound different as they cross the droplets of foam or with the sun at a certain angle it will seem like there are tiny diamonds on the glass); please let us know right away. Our crews carry a detailing product, which miraculously wipes away the overspray. They will clean your vehicle's windows in just a few minutes. If you choose to clean the glass yourself, you can do so by rubbing lightly with fine steel wool such as a S.O.S. pad, while using glass cleaner to keep the areas wet and lubricated. WARNING: Do not use this process on the painted finish of the vehicle or side mirrors as they are coated with a plastic film.

If you wish to talk to someone at our office regarding this matter, please call \_\_\_\_\_.

Sincerely,

\_\_\_\_\_  
President



**OVERSPRAY ABATEMENT FORM**

Job #: \_\_\_\_\_ Project Name: \_\_\_\_\_

It is recommended by our Company that you, our client, work closely with our Project Management Team: Salesperson \_\_\_\_\_ and Supervisor \_\_\_\_\_ to minimize and hopefully, completely eliminate all overspray problems. We believe that the best way to do this is to take a very pro-active approach. The first step is to inform all employees who could be affected by this situation by giving them a copy of the handout entitled "Spray Foam and Overspray." This will allow those who are really concerned about their vehicles to make arrangements to park elsewhere, purchase car covers, etc.

Next, our Company representative will suggest other procedures. Please use the attached checklist to outline the abatement plan for this project.

- |  |                    |
|--|--------------------|
| A. Distribute Overspray Handout                | Yes _____ No _____ |
| B. Close Parking Lots                          | Yes _____ No _____ |
| C. Partial Control of Parking                  | Yes _____ No _____ |
| D. Distribute Disposable Car Covers            | Yes _____ No _____ |
| E. Mask doors, windows, floors, etc (interior) | Yes _____ No _____ |
| F. Other                                       | Yes _____ No _____ |

It is recommended that the representatives from both companies sign this form and retain copies for your respective files.

SPF Contractor Company \_\_\_\_\_  
(Company Name)

\_\_\_\_\_  
Name/Title

\_\_\_\_\_  
Signature

Date: \_\_\_\_\_



**OVERSPRAY INCIDENT REPORT**

Claimant: \_\_\_\_\_ Date: \_\_\_\_\_

Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Tel: \_\_\_\_\_

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Project/Address: \_\_\_\_\_

Supervisor: \_\_\_\_\_ Salesperson: \_\_\_\_\_

Report submitted by: \_\_\_\_\_

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Make: \_\_\_\_\_ Model: \_\_\_\_\_ Year: \_\_\_\_\_

Color: \_\_\_\_\_ License #: \_\_\_\_\_ State: \_\_\_\_\_

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Did a Supervisor see the car? . Yes . No      Is it our overspray? . Yes . No

Were the windows cleaned? . Yes . No

Did claimant receive our SPRAY FOAM & OVERSPRAY handout? . Yes . No

**ACTION:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



**SPFA CONTRACTOR SAFETY AND PRODUCT STEWARDSHIP PROGRAM**

**Compliance Agreement**

I, \_\_\_\_\_, agree that \_\_\_\_\_ will  
Name Company Name

implement the Spray Polyurethane Foam Alliance (SPFA) Contractor Safety and Product Stewardship Program (CSPSP) beginning on the \_\_\_\_ day of \_\_\_\_\_, 2000 and ending on the \_\_\_\_ day of \_\_\_\_\_ 2001.

I further agree to re-certify on an annual basis that I will comply with the SPFA Contractor Safety and Product Stewardship Program.

\_\_\_\_\_  
(Print Name)

\_\_\_\_\_  
Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Date Received by SPFA \_\_\_\_\_ Signature \_\_\_\_\_