COSHH essentials for rubber manufacturers

This information will help employers comply with the Control of Substances Hazardous to Health Regulations 2002 (COSHH), as amended, to control exposure to rubber dust and protect workers health.

It is also useful for trade union and employee safety representatives.

This sheet describes good practice using dust extraction.

It covers the points you need to follow to reduce exposure to an adequate level.

It is important to follow all the points, or use equally effective measures.

Get safety data sheets from your chemical suppliers. Use these to identify the more dangerous chemicals, and less dangerous substitutes.

Main points

- Mixing can produce high levels of dust.
- Keep exposures as low as possible using all the controls in this sheet.
- Make sure the controls work.
- Health surveillance for dermatitis is needed - see sheet G403.

Control approach 2  Engineering control

Hazard

- Rubber process dust arises in rubber making where ingredients are handled, weighed, added to or mixed with uncured natural rubber or synthetic elastomers.
- Rubber process dust can cause cancer and dermatitis.
- Keep inhalation of rubber process dust as low as possible below the workplace exposure limit of 6 mg/m³ (8-hour time-weighted average).
- Rubber process dust does not include dust from cured rubber, eg from buffing or trimming.

Access and premises

- Only allow access to authorised staff.

Equipment

- Keep dust exposures as low as possible. Use pre-weighed additives in process-compatible bags or in ‘pre-dispersed’ forms such as wax pellets, pastilles, granules with binder, or dust-reduced powders. Can you use bulk handling methods?
- Enclose the mixer feed opening as much as possible.
- You need an air speed between 1 and 1.5 metres per second into the enclosure.
- Also extract any dust that is released from the top of the mill.
- Fit a manometer or pressure gauge near the extraction point, to show that the system is working properly.
- Discharge cleaned, extracted air to a safe place outside the building, away from doors, windows and air inlets.
- Have a supply of clean air coming into the workroom to replace extracted air as filter failure would cause gross contamination of any air returned to the workroom.
- Consult a qualified ventilation engineer to design new control systems and to update current controls. See sheet G406.

Personal protective equipment (PPE)

- Ask your supplier to help you select the right PPE.
Respiratory protective equipment (RPE)

✓ RPE should not be needed if the controls work properly.
✓ RPE is usually needed for maintenance and cleaning.
✓ Provide RPE with an assigned protection factor (APF) of at least 10. See sheet R2.
✓ Disposable RPE is acceptable - throw it away at the end of the task. Otherwise, replace RPE filters as recommended by the supplier.
✓ Make sure all RPE is properly fit-tested - get advice from your supplier.
✓ Keep RPE clean. Store it away from dust and other contaminants.

Other PPE

✓ Protective gloves are needed. Provide single-use or chemical resistant gloves.
✓ Throw away single-use gloves every time they are taken off, and other gloves at the end of the shift.
✓ Provide coveralls that do not retain dust.
✓ Use a contract laundry or a suitable equivalent to wash work clothing.
✓ Skin creams are important for skin condition and help in washing contamination from the skin. After work creams help to replace skin oils.

Caution: ‘Barrier creams’ do not create a full barrier.

Procedures

✓ Always confirm that the dust extraction is turned on and working at the start of work.
✓ To reduce exposure, can workers work to one side of the enclosure?
✓ Tell workers to scoop powder gently - not dump it.

Maintenance, examination and testing

✓ Follow instructions in maintenance manuals - keep equipment in effective and efficient working order.
✓ Daily, look for signs of damage.
✓ Repair faulty extraction systems as soon as possible. Meanwhile, wear RPE.
✓ At least once a week, check that the dust extraction system and gauges work properly.
✓ You need to know the manufacturer’s specifications to check the extraction’s performance.
✓ If this information isn’t available, hire a competent ventilation engineer to determine the performance needed for effective control.
✓ The engineer’s report must show the target extraction rates.
✓ Keep this information in your testing logbook.
✓ Get a competent ventilation engineer to examine the system thoroughly and test its performance at least once every 14 months. See the HSE publication HSG54).
✓ Examine and test non-disposable RPE thoroughly at least once every three months.
✓ Keep records of all examinations and tests for at least five years.
Health surveillance
✓ Use health surveillance for dermatitis. See sheet G403.
✓ Consult an occupational health professional - see ‘Useful links’.

Cleaning and housekeeping
✓ Vacuum clean the mixing area after every use.
✓ Clean general workrooms once a week to stop dust being stirred up.
✓ Use a Class H vacuum cleaner fitted with a HEPA filter to clear up dust.
Caution: Don’t use a brush or compressed air for cleaning surfaces or clothing.

Training and supervision
✓ Tell workers that rubber process dusts can cause cancer. Warn them about dermatitis.
✓ Working in the right way and using the controls correctly is important for exposure control. Train and supervise workers. See sheet RB0.
✓ Ask your trade association for advice on training providers - see ‘Useful links’.

Further information
- Maintenance, examination and testing of local exhaust ventilation
- A new practical guide to complying with COSHH in the rubber industry
  Guidance HSE Books 1997 ISBN 0 7176 1372 0
- Dust and fume control at rubber mixing and milling Guidance HSE Books 1996 ISBN 0 7176 0992 8
- Respiratory protective equipment at work: A practical guide
- Safe to breathe: Dust and fume control in the rubber industry Leaflet
  IACL95 HSE 1995 Web only version available at
  www.hse.gov.uk/pubns/rubindext.htm
- Preventing dermatitis at work: Advice for employers and employees
  Leaflet INDG233 HSE Books 1996 (single copy free or priced packs of
  15 ISBN 0 7176 1246 5)
- Posters on protective gloves and skin care - see
  www.hse.gov.uk/skin/information.htm
- For environmental guidelines, see sheet RB0
Useful links

- The British Rubber Manufacturers Association (BRMA)
  6 Bath Place, Rivington Street, London EC2A 3JE
  Tel: 0207 457 5040 Website: www.brma.co.uk
  e-mail: mail@brma.co.uk.

- The British Tyre Manufacturers Association (BTMA)
  www.btmauk.com e-mail: mail@btmauk.com
  Postal address as BRMA (above).

- The British Rubber and Polyurethane Products Association (BRPPA)
  www.brppa.co.uk e-mail: mail@brppa.co.uk
  Postal address as BRMA (above).

- The Retread Manufacturers Association (RMA)
  PO Box 320, Crewe, Cheshire CW2 6WY
  Website: www.retreaders.org.uk e-mail: rma@greentyres.com.

- HSE priced and free publications are available from HSE Books
  Tel: 01787 881165 Website: www.hsebooks.co.uk.

- See www.coshh-essentials.org.uk for other chemicals.

- For information about health and safety ring HSE’s Infoline Tel: 0845 345 0055 Textphone: 0845 408 9577 e-mail: hse.infoline@natbrit.com.

- Contact the British Occupational Hygiene Society (BOHS) on 01332 298101 or at www.bohs.org for lists of qualified hygienists who can help you.

- Look in the Yellow Pages under ‘Health and safety consultants’ and ‘Health authorities and services’ for ‘occupational health’.

- Also see www.nhsplus.nhs.uk.

Employee checklist

☐ Is the extraction switched on and working properly?
  Check the gauge.

☐ Check that any RPE works properly every time you use it.

☐ Make sure that bags etc aren’t drawn into the extract ducts.

☐ Look for signs of leaks, wear and damage.

☐ If you find any problems, tell your supervisor. Don’t just carry on working.

☐ Co-operate with health surveillance.

☐ Use, maintain and store your PPE in accordance with instructions.

☐ Throw away single-use gloves every time you take them off, and chemical resistant gloves at the end of the shift.

☐ Wash your hands before and after eating, drinking, smoking and using the lavatory.

☐ Never use solvents to clean your skin.

☐ Use skin creams provided as instructed.