

Understanding OSHA Requirements for Auto Shops

The Occupational Safety and Health Administration (OSHA) is a Federal agency whose mission is to protect workers on the job through regulations, inspections, education, and assistance. OSHA regulates and provides guidance on topics such as personal exposure limits (PEL) to hazardous materials or chemicals, personal protective equipment (PPE), machine and electrical safety, fire prevention and contingency planning, and hazard communication. This fact sheet provides an overview of OSHA requirements and safety topics relevant to auto shops. In addition, OSHA has a webpage specifically targeting auto shop issues and regulations.

Hazard Communication: What You Need To Know

Safety Data Sheets (SDSs)

Formerly known as Material Safety Data Sheets (MSDSs), Safety Data Sheets provide information about products and chemicals such as ingredients, first aid and proper personal protective equipment (PPE). According to the Hazard Communication standard 29 CFR 1910.1200, all businesses must store SDSs for each hazardous chemical in the shop in a known and easily accessible location. SDSs contain valuable information about health hazards, environmental and disposal concerns, and protective measures associated with each chemical. OSHA has created a webpage that outlines the sections of an SDS.

Personal Protective Equipment (PPE): What You Need To Know

General requirements

Employers are responsible for assessing workplace hazards and identifying, providing, and training employees on the use and maintenance of PPE that corresponds to the nature of their work. (29 CFR 1910.132)

Not only must employers provide appropriate PPE, but they must also enforce that it is used. If someone gets hurt on the job and was not using correct or appropriate PPE, your business may be held liable and become subject to OSHA enforcement.

Protection for eyes and face

Based on the task, workers may need protection against chemical splashes, vapors or mists, flying sparks or particles, or harmful glare (29 CFR 1910.133). Protective eyewear should fit properly and be appropriate for the work. For instance, safety goggles are not adequate protection for welders who need welding shields. OSHA outlines the eye protection rating for different tasks, including minimum shade eye protection for welders, beginning on page 11 of this Personal Protection Equipment brochure.

Protection for hands

Gloves are needed for many tasks in auto shops. OSHA enforces hand protection under <u>29</u> <u>CFR 1910.138</u>. The type glove and it varies from task to task. Here are some examples of different gloves and their uses:

- > Leather gloves are required for welding because they protect against sparks, heat, and sharp objects.
- Shop owners must provide their workers with appropriate gloves to protect them from solvents. Glove varieties include butyl, neoprene, or nitrile gloves and it is up to you to read the SDS for each product since these gloves do not protect against all hazardous chemicals. The University of California's Lawrence Berkeley Laboratory created a useful guide on glove selection and chemicals. OSHA also has a glove resistance chart beginning on page 26 of their PPE guide.
- Latex gloves are meant to be used in the health care setting, as they only protect against germs or biological hazards. In addition, latex gloves may cause an allergic, and sometimes deadly, reaction in some individuals. You should avoid using latex gloves.

Protection for hearing

The OSHA enforceable permissible exposure level over an eight-hour workday is 90 decibels (dB). The limit for 15 minutes is 115 dB (29 CFR 1910.95). If workers are exposed to a loud environment, provide earplugs or other ear protection. Note that a hearing conservation program is required whenever employee noise exposures equal or exceed 85 decibels over an eight-hour workday. OSHA has created a guidance document to assist you in setting up a hearing conservation program.

Protection for paint technicians

Auto body shops require additional skin protection (for the head, face, and arms) for paint technicians during spray painting activities to protect against chemical exposures. These include protecting all exposed skin from harm with either a chemical resistant full-body suit or other non-static discharge producing outer clothing. Also, painters should protect their head and face with a hood and goggles – all exposed skin must be protected.

Respiratory Protection: What You Need To Know

General information

Respirators protect workers lungs from hazardous airborne chemicals or particles. Employers are responsible for providing adequate respiratory protection that corresponds with the hazardous chemical exposure of the task being performed (29 CFR 1910.134). Tasks in your shop where OSHA requires that employees wear respirators include painting, sanding, welding and whenever ventilation controls and work practices are not adequate enough to reduce exposures below the PELs for particulates or chemicals (See 29 CFR 1910, Subpart Z).

Respiratory protection programs

Auto shops must develop a respiratory protection program. Respiratory protection programs include written workplace procedures, proper selection of NIOSH approved respirators, training, fit testing, inspection and maintenance, medical evaluations, work area surveillance, and provisions for clean breathing air when using supplied-air respirators.

Even when exposure levels do not exceed OSHA PELs, workers may still decide to wear respirators. In this case, a limited respiratory protection program is still required, including

proper training and fit testing, so that workers don't cause themselves harm by improperly using the respirators. The California Department of Industrial relations has created <u>guidance on creating a respiratory protection program</u>.

The right respirator

OSHA has developed a 'Quick Card' which describes different types of respirators and how they should be used. They also include respirator selection guidance beginning on page 9 of their Respiratory Protection Brochure. In addition, NIOSH has created a brochure to assist businesses in respirator selection.

Fit testing and training

Fit tests and training are required annually for all those who wear tight-fitting respirators. Some fit tests and trainings may be available through some supply companies and occupational health clinics. Note that any facial hair that could interfere with the respirator seal is not permitted.

Medical evaluations

Employees who wear respirators or work in a task that requires the use of respiratory protection need to have a medical evaluation. An occupational physician or other licensed health care professional can perform medical evaluations for shops' respiratory protection programs.

Fire Prevention and Emergency Training: What You Need To Know

Fire Extinguishers

The Massachusetts Fire Prevention Regulations <u>527</u> CMR 10.02(1) and <u>23.07</u> are not OSHA requirements,

but are included in this fact sheet because they relate to job safety.



A portable fire extinguisher with a maintenance tag

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State fire prevention regulations mandate that all buildings required by the fire department to provide portable fire extinguishers must install and maintain them in accordance with the National Fire Protection Agency's (NFPA) <u>Code 10</u>. Specifically, fire extinguishers must be subjected to yearly maintenance. Each fire extinguisher must have a tag or label securely attached that indicates the month and year the maintenance was performed, the identification of the person and company performing the maintenance.

Each fire extinguisher must be inspected each month to be sure that:

- It remains in its designated place.
- They are accessible and visible.
- Operating instructions are legible and fully visible.

- Safety seals and tamper indicators are not broken or missing.
- The extinguisher feels full when lifted.
- > The extinguisher is not physically damaged, corroded, leaking, or clogged,
- > The pressure gauge reading or indicator is in the operable range or position, and
- ➤ The Hazardous Material Information System (HMIS) label (copy and paste this into your browser: https://www.mica.edu/Documents/EHS/HMIS%20POSTER%20LARGE.pdf) is in place.

Employee training

According to OSHA regulation 1910 Subpart E, employers with more than 10 employees must have both a written emergency action plan and a written fire prevention plan. Employers with 10 or fewer employees must still have emergency action and fire prevention plans, but they do not need to be in writing. This guarantees that your employees are clear on what they are and are not to do in case of a fire at your business.

29 CFR 1910.157 states that if your plans included the use of portable fire extinguishers be used by employees, all employees must receive annual training on fire extinguisher use and the hazards associated with fighting the fires. If your plan does not include use of fire extinguishers, you must make sure that your employees understand they should not attempt to fight a fire and should evacuate the building, and THEN dial 911 to call the fire department.

Storage of Flammable Substances: What You Need To Know

Flammable storage cabinets

OSHA requires that chemicals be stored properly in order to prevent accidents. Flammable liquids need to be stored separately from other types of chemicals, such as those that are corrosive or highly reactive. Shops should avoid storing flammable chemicals in direct sunlight or near heat sources. 29 CFR 1910.106 details the regulations regarding designated and approved fireproof cabinets:

- Flammable liquid storage areas need to be labeled clearly with "FLAMMABLE KEEP FIRE AWAY"
- No more than 60 gallons of Category 1, 2, or 3 flammable liquids and no more than 120 gallons of Category 4 flammable liquids can be stored in a fireproof cabinet.
 - Category 1 liquids have flashpoints below 73.4° F and boiling points at or below 95° F
 - Category 2 liquids have flashpoints below 73.4° F and boiling points above 95° F
 - Category 3 liquids have flashpoints at or above 73.4° F and at or below 140° F
 - Category 4 liquids have flashpoints above 140° F and at or below 199.4° F
- Metal cabinets need to be constructed with at least 18-gauge sheet iron and double walled with 1 ½ inch air space and the doorsill must be at least 2 inches above the bottom of the cabinet.

All containers stored in the cabinet need to be labeled properly with expiration dates, contents, and manufacturer warnings.

Flammable liquids storage rooms

Shops that do painting likely have a paint storage or mixing room. These must comply with OSHA ventilation requirements. See the "Spray Painting Regulations" fact sheet. Also, OSHA flammable storage regulations 29 CFR 1910.106 refer to the requirements for electrical wiring, storage capacity, and arrangement of the chemicals.

- ➤ Electrical wiring inside storage rooms used for Category 1 and 2 flammable liquids need to be approved under the specifications for Class I, Division 2 Hazardous Locations (29 CFR 1910.307 and 106).
- People need to be able to safely move in and out of the storage.
- Under 1910.106(d)(5)(v), Table H-14 outlines on which floors flammable categories 1 through 4 may be stored.
- The storage room must be built in a way that contains spills if/when they occur, and workers should safely remove and appropriately manage leaking containers as soon as they are discovered.
- A fire extinguisher and/or other fire control device or system should be readily available in or near the room.

Worker Rights: What You Need To Know

If workers are concerned about their safety, they have the right to contact their <u>regional OSHA</u> <u>office</u> to request advice or an inspection. See this <u>Worker's Rights</u> page for more information.

Reporting injuries

Employers are responsible to investigate workplace injuries, determine whether or not they need to be reported to OSHA, and report those incidents. Find out reporting and record keeping requirements here.

For free and confidential technical assistance or questions, contact:

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