OSHA Requirements for Auto Shops:

Listed below are the OSHA requirements and safety topics relevant to auto shops, which all of our members should have a part of their company safety program.

Hazardous Communication:

<u>Hazard Communication Standard</u> (29 CFR 1910.1200): All businesses must store SDSs (formally MSDS) 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.

Personal Protective Equipment:

<u>General Requirements</u> (29 CFR 1910.132): 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.

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.

<u>Protection for Eyes and Face</u> (29 CFR 1910.133): Based on the task, workers may need protection against chemical splashes, vapors or mists, flying sparks or particles, or harmful glare. Protective eyewear should fit properly and be appropriate for the work.

| Eye and Face Protection Selection Chart | | |
|---|---|---|
| Source | Assessment of Hazard | Protection |
| IMPACT - Chipping, grinding, machining, drilling, chiseling, riveting, sanding, etc. | Flying fragments, objects, large chips, particles, sand, dirt, etc. | Spectacles with side protection, goggles, face shields. For severe exposure, use face shield over primary eye protection. |
| HEAT - Furnace operations, pouring, casting, hot dipping, and welding. | Hot sparks Splash from molten metals High temperature exposure | Face shields, goggles, spectacles with side protection. For severe exposure use face shield. Face shields, reflective face shields. Screen face shields, reflective face shields. |
| CHEMICALS - Acid and chemicals handling | Splash Imitating mists | Goggles, eyecup and cover types. For severe exposure, use face shield over primary eye protection Special-purpose goggles |
| DUST - Woodworking, buffing, general dusty conditions | Nuisance dust | Goggles, eyecup and cover types. |
| LIGHT and/or RADIATION Welding - electric arc Welding - gas | Optical radiation Optical radiation | Welding helmets or welding shields. Typical shades: 10- 14 Welding goggles or welding face shield. Typical shades: gas welding 4-8, cutting 3-6, brazing 3-4 |
| Cutting, torch brazing, torch soldering Glare | Optical radiation Poor vision | Spectacles or welding face shield. Typical shades: 1.5-3 Spectacles with shaded or special-purpose lenses, as suitable. |

<u>Protection for Hands</u> (29 CFR 1910.138): Gloves are needed for many tasks in auto shops. 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.

<u>Protection for Hearing</u>: 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.

<u>Protection for Paint Technicians:</u> 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 no 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:

General Information (29 CFR 1910.134): 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. 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).

<u>Respiratory Protection Programs</u>: 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

<u>The Right Respirator:</u> OSHA has created guidance on what types of respirators should be used for what hazard they are being exposed to.

Single-strap dust masks are usually not NIOSH-approved. They must not be used to protect from hazardous atmospheres. However, they may be useful in providing comfort from pollen or other allergens.



Approved filtering facepieces (dust masks) can be used for dust, mists, welding fumes, etc. They do not provide protection from gases or vapors. DO NOT USE FOR ASBESTOS OR LEAD; instead, select from the respirators below.



Half-face respirators can be used for protection against most vapors, acid gases, dust or welding fumes. Cartridges/filters must match contaminant(s) and be changed periodically.



Full-face respirators are more protective than half-face respirators. They can also be used for protection against most vapors, acid gases, dust or welding fumes. The face-shield protects face and eyes from irritants and contaminants. Cartridges/filters must match contaminant(s) and be changed periodically.



Loose-fitting powered-air-purifying respirators (PAPR) offer breathing comfort from a battery-powered fan which pulls air through filters and circulates air throughout helmet/hood. They can be worn by most workers who have beards. Cartridges/filters must match contaminant(s) and be changed periodically.



A Self-Contained Breathing Apparatus (SCBA) is used for entry and escape from atmospheres that are considered immediately dangerous to life and health (IDLH) or oxygen deficient. They use their own air tank.



<u>Fit Testing and Training:</u> 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.

<u>Medical Evaluations:</u> 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:

<u>Fire Extinguishers:</u> 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) Code 10. 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, with the employee signing and dating the rear of the service tag. The employee is ensuring the fire extinguisher:

> 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.

Emergency Action Plan:

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:

<u>Flammable storage Cabinets:</u> 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.

<u>Flammable Liquids Storage Rooms</u>: Shops that do painting likely have a paint storage or mixing room. These must comply with OSHA ventilation requirements. 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 room.
- ➤ 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:

If workers are concerned about their safety, they have the right to contact their regional OSHA office to request advice or an inspection.

<u>Reporting Injuries</u>: Employers are responsible to investigate workplace injuries, determine whether or not they need to be reported to OSHA, and report those incidents.