DEALER ALERT

**TO**: Environmental Health and Safety (EHS) Coordinator

**FROM**: Sam Celly, MS JD CSP REA

**SUBJECT: WHEN SECONDS COUNT**

Current OSHA regulations require that an emergency eyewash stations be provided whenever employees may come into contact with chemicals that can cause corrosion, severe irritation, or permanent tissue damage. Conditions such as battery charging in shop, usage of corrosive chemicals or irritants in detail or shop require the installation of an eye wash station and a deluge shower depending upon the chemicals used in the shop area.

 **Eyewash Station Must Meet Statutory Requirements As Follows**:

* The **station must be no more than 10 seconds walking distance** and not over 100 feet from the potential point of hazard and must be clearly accessible and conspicuous. There should be no blockages on the way to the eye wash station.
* The eye wash station’s control valve, when activated by the operator, must remain in “On” position without further action on the part of the operator until shut off by the operator.
* The eye wash station must deliver 0.4 gallons per minute (GPM) for a minimum of 15 minutes to the affected eyes.
* The stations should be inspected monthly for proper operation and monthly inspections documented. Inspection to include flushing that will remove rust, if any, in the system and to verify of continued water supply.
* The self contained units must have the tank sealed and the solution replaced every 90 days. Tank unit manufacturer maintenance guidelines must be followed. Generally, the maintenance requires draining and flushing of the tank. Refilling includes addition of biocide (costs about $25) and then topping off with drinking water from the shop area.

Note 1: Water hoses, sinks faucets, showers and eyewash bottles (sometimes included in first-aid kits) do not comply with Cal/OSHA eyewash standards.

Note 2: If there is water line available in the shop area, then the plumbed unit is preferred as the wall mounted tank requires more maintenance and is expensive to operate. Also, if a tech uses the wall mounted unit at 9AM, the tech requiring it at 10AM goes blind!!!

Note 3: The eye wash units should have proper drain available to address the water draining from the unit. If the unit cannot be plumbed to the shop drain, a 5 gallon plastic bucket can be hooked up that can be drained periodically.

**Deluge Shower**: In certain circumstances, deluge showers may be necessary. Review the MSDS for corrosive chemicals, such as floor cleaners, being used in the shop area for deluge shower requirements. Title 8 CCR 5162 requires eyewash and deluge showers where caustic or corrosives may be splashed into eyes or on body. OSHA and Cal/OSHA define corrosives as a substance that when applied to the skin for 4 hours, it results in tissue destruction.  This would include corrosives with a pH < 2 or > 12 and also includes proteolytic compounds/enzymes that can cause tissue destruction.

**New Regulations on the Horizon**: OSHA regulations on emergency eye wash stations have adopted portions of the American National Standards Institute (ANSI) standard Z358.1-1981. ANSI has revised the eye wash standard and the new standard Z358.1-2009 has been published. The objective of this note is to inform you that eye wash station regulations currently in place, as listed above, must be complied with till OSHA clears the legislative hurdles and adopts the new ANSI standard.

**Penalties**: Cal/OSHA considers violation of this standard to be a ‘Serious Violation.” Penalty is $6750. Reportedly, the penalty for violation when an injury occurs from corrosives is $20,000.

***Authority Cited****: California T8CCR5162 & 5185 and Federal 29CFR 1910.151(C)*