



Complete Health Environmental and Safety Services

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A Manageable Lot to Worry About: A Regulations Checklist

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You need to comply with a lot of regulations – OSHA, EPA, MPCA, fire code, waste codes, water, air.... A bit intimidating at first blush. But they exist for a reason – to keep your place from burning down or poisoning your workers or neighbors, or to eventually save you the cost of an employee's life-changing injuries. While there are a lot of regulations, the list of those of most concern isn't too horribly long. In fact, they're sensible, even if they aren't things you'd think of on your own. These are the major ones (with the caution that this isn't meant to be comprehensive. Contact us if you need more information):

Let your employees know what they're working with - Right to Know: Employees have the right to know the hazards of the chemicals they use. OSHA requires that you train your employees on that initially and that you update the training each year. You also need to have material safety data sheets available. All chemical containers need to be labeled, so everyone in the shop knows what's in them.

Keep hearing - Noise: Hearing loss is harder to cope with than going blind. Air powered tools are noisy. If you can't use quieter equipment, protect your employees by training them on the hazards of noise and by providing comfortable hearing protection. You should also provide annual hearing tests, to check that they're using hearing protection effectively.

Protect them: Personal Protective Equipment and Respirators: You need to determine if your employees need safety glasses, respirators, hearing protection, or other protective equipment. You must provide it and you're responsible for making sure it is used. If employees need respirators or dust masks, that equipment has to be used safely and correctly. That means training and fit-testing respirator users each year, getting medical approval for them to wear the equipment, and writing out procedures for maintenance, selection, and care.

Don't Shock. Walk through your facility and look at anything electrical. Check that all wiring and cords are in good condition and undamaged. Tape on a cord is usually a sign of damage, as is a missing grounding prong? Electrical panels have to be accessible. Open the panel. Are all circuits guarded, with no missing breakers?

Prepare for Problems. Put in a working eyewash. Those small bottles of saline don't do an adequate job. If you don't have hot and cold water anywhere that corrosives are used, install a gravity-fed eyewash (one that you need to fill routinely). Don't forget to maintain it.

Keep the place tidy. Make sure emergency exit doors are unlocked, labeled, easy to get to, and lead to a safe place.

If you use hydraulics to raise vehicles (vehicle lifts, jacks), remember that hydraulics can fail. Make sure your employees use jack stands. Check that your vehicle hoists have working safety devices. Inspect them. Check your jacks, check your lifts, and check your whole facility often, to catch safety problems before they've caused injuries.

Prevent fires: If you're spraying flammable liquids, control the vapors so you don't have a fire. That means a sprinklered, ventilated spray booth. If you have enough flammable material on-hand, you need a storage room designed for that. Electrical sparks can cause fires, so any place you spray or store flammable materials must have special wiring.

If you're dispensing flammable liquids, bond and ground them, to control static electricity. Use safety cans for gasoline.

Keep the air clean. Body shops put a lot of stuff in the air, from solvents evaporating to the mists from spraying. That can be a hazard both to your workers and to your neighbors. The same paint booth you use to control fire hazards also controls air pollution, provided it works well and has good filters to capture the particles. Spraying efficiently also reduces the amount you pollute. Because of the air pollution concerns, EPA's NESHAPs 6H rule requires you to do nearly all spraying in a completely enclosed booth with 98% efficient exhaust filters and using HVLP guns or equivalent. OSHA also requires a good spray booth, because it helps protect workers.

Mechanical shops don't pollute as much as collision repair shops, so aren't as strictly regulated. But if they run cars inside to do engine checks, they need to vent the exhaust outdoors, through hoses attached to tailpipes and run outside or connected to an exhaust system.

Watch your waste. It's obvious (we hope) that waste paint thinner needs to be handed as hazardous waste. But so do paper towels used to clean paint guns, floor dry used to pick up paint spills...if it's used with something that would be hazardous waste, it might need to be handled as hazardous waste. Paint stripper is hazardous waste, too. You can't legally scrape it off the car and then wash it down the drain. Collect the waste, label it, and have a licensed handler haul it off for you. Don't forget to keep the waste container closed and to check it weekly.

Light bulbs, oil, and batteries aren't hazardous waste, so you don't have to use a hazardous waste manifest for disposal. But because improper disposal can pollute, they are regulated waste. You need to keep track of how much you get rid of each year. Get receipts for this stuff.

Using lots of aerosol cans? You can throw the cans away once they're empty, but make sure they're really empty. They should have no pressure and no product left inside. If any propellant or product is left in the can, it probably needs to be handled as hazardous waste.

If you have questions about the safety, health, and environmental regulations you need to comply with, contact CHESS at 651-481-9787; toll free at 877-482-4377, or carkey@chess-safety.com.

This article is intended to provide general information (not advice) about current safety topics. To discuss your specific concerns and how CHESS may help, please contact CHESS at 651-481-9787 or chess@chess-safety.com.

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