

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20210



August 22, 1996

Mr. Timothy J. Batz, CSP, ARM
Senior Vice President
Loss Control Manager
Lockton Companies
Post Office Box 221300
Denver, Colorado 80222-9300

Dear Mr. Batz:

This is in response to your letter of July 31, to the Office of General Industry Compliance Assistance, requesting clarification regarding the use of eyewash stations as required by 1910.151.

You ask in your letter what is considered a corrosive material, and is there a certain pH-level that quantifies this. Secondly, you ask what travel distance can an eyewash station not exceed from the exposed worker, and asked for clarification of the Occupational Safety and Health Administration's (OSHA) meaning of "within the work area."

OSHA's definition of a corrosive is a chemical that causes visible destruction of, or irreversible alterations in, living tissue by chemical action at the site of contact. Under the provisions of OSHA's hazard communication standard, (29 CFR 1910.1200(g)), employers are required to have a material safety data sheet (MSDS) in the work place for each hazardous chemical which they use. The MSDS provides information you need to ensure proper protective measures are implemented prior to exposure, including emergency and first aid procedures.

Regarding your inquiry as to the required proximity of the eye/face wash units and emergency deluge showers, 29 CFR 1910.151(c) requires that these units, "...shall be provided within the work area for immediate emergency use." OSHA standards are silent on a required distance and therefore the Agency refers to the recommendations with respect to highly corrosive chemicals contained in American Standard for Emergency Eyewash and Shower Equipment ANSI Z358.1-1990. OSHA interprets the phrase "within the work area" to require that eye/face wash units and emergency deluge showers both be located within 10 feet of unimpeded travel distance from the corrosive material hazard or, in the alternative, within the distance recommended by a physician or appropriate official the employer consulted.

Since your questions were asked in the context of an automobile service garage, enclosed is a copy of OSHA Instruction STD 1-8.2, which provides guidelines regarding eyewash and body flushing facilities required for immediate emergency use in electric storage battery charging and maintenance areas.

We hope this information is responsive to your concerns. If you have any further questions, please contact Renee Carter of my staff at (202) 219-8041, x117.

Sincerely,

Raymond E. Donnelly,
Director,
Office of General Industry Compliance Assistance