IM-95-11

January 30, 1995

Grant Laiblin Willamette Hose & Fitting Inc. P.O. Box 1407 Philomath, OR 97370

Dear Grant:

Thank you for contacting us for a variance to use high pressure air for cleaning the inside of hydraulic hoses before shipment to your customers. Based on the information which you provided to Bob Thiessen when he visited your hose assembly area it appears that a variance will not be needed. The enclosed copy of a Federal OSHA instruction describes the intent and application of 1910.242(b) and discusses acceptable methods for complying with its requirements.

In short, the use of compressed air for cleaning purposes at pressures at or greater than 30 psi is permissible if the outlet or source is fitted with a relief device that drops the pressure to less than 30 psi if the flow is dead-ended. Appropriate personal protective equipment must be worn as called for in the standard.

You will need to evaluate your procedures for compliance with the information in the enclosed interpretation. If these conditions are met, then a variance will not be required.

Sincerely,

Marilyn K. Schuster, Manager Standards & Technical Resources Section Oregon Occupational Safety & Health Division

wilhselt/RT

OSHA Instruction STD 1-13.1 October 30, 1978 Office of Program Operations

February 14, 1972

OSHA PROGRAM DIRECTIVE #100-1

To: National and Field Offices

SUBJECT: Reduction of Air Pressure Below 30 psi for Cleaning Purposes

Attachment: Acceptable Methods for Complying with 41 CFR 50-204.8 and 29 CFR 1910.242(b)

1. Purpose. To provide guidance and examples of what alternate systems will meet the requirements of this section, and to clarify its intent.

2. Background. A number of inquiries have been received requesting a clarification of the meaning of 1910.242(b) also known as 41 CFR 50-2048 under the Walsh-Healey Act.

3. Interpretation. The phrase "reduce to less than 30 psi" means that the downstream pressure of the air at the nozzle (nozzle pressure) or opening of a gun, pipe, cleaning lance, etc., used for cleaning purposes will remain at a pressure level below 30 psi for all static conditions. The requirements for dynamic flow are such that in the case when dead ending occurs a static pressure at the main orifice shall not exceed 30 psi. This requirement is necessary in order to prevent a back pressure buildup in case the nozzle is obstructed or dead ended. See enclosure (1) for two acceptable methods of meeting this requirement. Also, there is no intent to restrict the diameter of the nozzle orifice or the volume (CFM) flowing from it.

"Effective chip guarding" means any method or equipment which will prevent a chip or particle (of whatever size) from being blown into-the eyes or unbroken skin of the operator or other workers. Effective chip guarding may be separate from the air nozzle as in the case where screens or barriers are used. The use of protective cone air nozzles are acceptable in general for protection of the operator but barriers, baffles or screens may be required to protect other workers if they are exposed to flying chips or particles.

4. Action. Inquiries about subject section should be handled in accordance with this instruction.

5. Effective Date. This instruction is effective immediately, and will remain in effect until canceled or superseded.

Director, of Program Operations

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> For Attachment see Printed Copy Acceptable Methods For Complying With 41 CFR 50-204.8 and 29 CFR 1910.242(b) Use of Compressed Air

Director, of Program Operations

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Originator: OCSDG

in the standard.

Dec. 6, 1985

Dr. George J. Reilly Coordinator and Head, Scientific Research Winterthur Museum & Gardens Route 52 Winterthur, Delaware 19735

Dear Dr. Reilly:

Acting Assistant Secretary Patrick R. Tyson has asked me to respond to your letter dated November 25, requesting a permanent variance from Section 1910.243(b), Compressed air used for cleaning, of the Occupational Safety and Standards.

The enclosed copy of the OSHA Instruction STD 1-13.1 describes the intent and application of this standard. In short, the use of compressed air for cleaning purposes at pressures at' or greater than 30 psi is permissible if the outlet or source is fitted with a relief device that drops the pressure to less than 30 psi if the flow is dead-ended. Appropriate personal protective equipment shall be worn as called for in the standard.

You will have to evaluate your procedures in terms of this directive. If I can be of any further assistance, please contact me at (202) 523-7193.

A variance from Section 1910.243(b) is unnecessary, therefore, no further action will be taken on your application.

Sincerely,

James J. Concannon Director office of Variance Determination

Enclosure

DTS/iConcannon/ss/12-5-85 CCU # 37620

November 25, 1985

Assistant Secretary of Labor OSHA Washington, D.C. 20210