Department of Insurance and Finance

NEIL GOLDSCHMIDT GOVERNOR

21 LABOR AND INDUSTRIES BUILDING SALEM, OREGON

January 19, 1990

Sue Johnston Executive Director Oregon Funeral Directors Association 30240 SW Park Way Ave Wilsonville OR 97070

Dear Sue:

It was a pleasure meeting with you and members of your association last week regarding eyewash and safety shower requirements for funeral homes.

Oregon's formaldehyde rules, OAR 437, Division 2, 1910.1048 make a big distinction between the need for eyewash facilities and safety showers. With an eyewash, the formaldehyde solution need only be 0.1 percent or greater for the unit to be required. For situations involving possible splashes to the body, the solution must be 1 percent or greater for an emergency shower to be required.

Members of your association can meet the intent of these rules by providing a standard eyewash fountain and a combination drench hose. The drench hose may be used in lieu of the more familiar emergency shower due to the amount of formaldehyde solution which your industry uses.

I have included copies of typical drench hose equipment which should be fairly easy to install at a sink in the work area, preferably near the eyewash unit.

If you have any other questions or need more information, please don't hesitate to give me a call.

Stephen G. Beech , Manager Technical Services Section Oregon Occupational Safety & Health Division 378-3272

Formaldehyde

This chemical is classified as an irritant and a potential cancer-causing hazard. Occupational safety and health rules establish one part per million for an eight-hour average as the permissible exposure limit. Studies show that levels as high as 10 parts per million have been found in mortuary and funeral home preparation rooms.

To avoid the overexposure of workers to formaldehyde, the preferred method is to provide engineering controls in the workplace environment. This would be some type of mechanical exhaust ventilation system which pulls contaminated air away from an employee's breathing zone and vents it to the outside of the building. If engineering controls are not feasible given a specific work environment, then, at a minimum, employers are required to provide respirators for all workers overexposed to formaldehyde.

In addition, employers are required to take air monitoring samples regularly to determine if overexposures are occurring. If this is the case, the employer must provide medical surveillance or monitoring (periodic physical examinations). Medical surveillance is initiated at the employee's request and paid for by the employer. All air sampling and medical surveillance records must be maintained by the employer for 30 years.

Employers also are required to provide Personal Protection Equipment (PPE) to workers at all times. This includes gloves, chemical goggles, and face shields. In the event that a worker is splashed with formaldehyde and there is direct exposure to the skin and eyes, employers are required to provide (two-jet type) eye washes (plumbed) and quick-drench showers. Both of these must be Immediately available in the area where employees are exposed to chemicals. If a worker is splashed in the eyes with formaldehyde, 15 minutes of flushing with a water-pressure eye wash is necessary.

Other chemical hazards found in mortuaries and funeral homes may include industrial cleaning and sterilization products. The same Personal Protective Equipment can be used effectively in the presence of these chemicals.

Emergency Response Plans

Employers are required to have Emergency Response Plans in place, and all employees must be trained in the proper procedures to follow in the event of an accidental spill or equipment failure. Although it is not required, Oregon OSHA staff recommends that these plans be in writing. During the inspection process, OR-OSHA compliance officers may question employees about their knowledge of implementing an emergency response plan in the workplace.

For more information regarding OR-OSHA programs, call (503) 378-3272 in Salem or toll free 1-800-922-2689 or write:

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