

INTEROFFICE MEMORANDUM
Oregon Occupational Safety & Health Division

November 23, 2005

TO: ALL OSHA
FROM: Marilyn K. Schuster, Policy Manager
SUBJECT: Exposed Light Bulb Hazard

The following question was recently posed:

An employer has permanent florescent lights over a work bench within 6 feet of the floor. Is there a standard which can be used to address accidental breakage?

The hazard of breaking an exposed light bulb or tube is not electrical but mostly that of broken glass or toxic contents of the tube. Thus, citing from the electrical standard in Division 2 is not possible except the one case 1910.305(a)(2) and that covers only temporary wiring. Two other sections mention the guarding of live parts. A light bulb or tube is not a live part. The only standard that allows citing unguarded permanent lights is Division 4, 437-004-2810(5) for general applications and 437-004-3050(5)(a) which covers Ag buildings with special hazards.

In short, there is no language in Division 2 that would allow us to sustain a citation of unguarded light bulbs or tubes for either an electrical hazard or for the hazard of broken glass and parts raining down on an employee. After the glass is on work surfaces or the floor we could address it as a housekeeping issue.