

U.S. Department of Labor

Occupational Safety and Health Administration
299 Cherry Hill Road
Suite 103
Parsippany, NJ 07054
Phone: (973) 263-1003
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July 29, 2011

Re: OSHA Car Wash Local Emphasis Program

To Whom it May Concern:

I am writing you today to notify you that the Occupational Safety and Health Administration (OSHA) Parsippany Area Office has established a Local Emphasis Program (LEP) focusing on the Car Wash industry in New Jersey. This LEP was developed to assure employees in this industry are protected from hazards inherent to car wash operations. Under this program, your establishment may receive a planned enforcement inspection.

Historically, inspections that generate enforcement activity in the Car Wash Industry have been limited to referrals and complaints. A review of local inspection history revealed that employees employed at car washes are likely to be exposed to safety and health hazards on a daily basis. The most serious of these hazards are getting caught in automated equipment (amputations) and being struck by vehicles or equipment. Among others, additional hazards that are frequently found include lack of personal protective equipment to protect workers from chemicals, as well as a lack of communicating chemical hazards to employees.

The implementation of this Local Emphasis Program supports the Department of Labor's goal to ensure workplaces are safe for everyone by reducing injuries, illnesses, and fatalities in the car wash industry.

If you need assistance with safety and health issues, you may also contact the New Jersey On-Site Consultation Program which offers free and confidential safety and health consultative services to small and medium-sized businesses. These services assist employers with identifying workplace hazards, providing advice on compliance with OSHA standards, and assisting with establishing safety and health management systems. The New Jersey On-site Consultation Service can be reached at 609-292-0404.

If you have any questions regarding this LEP or if you need assistance with OSHA compliance issues, you may contact Beatriz Cabrera, Compliance Assistance Specialist at 973-263-1003 ext. 108.

Sincerely,

A handwritten signature in black ink that reads "Kris E. Hoffman".

Kris E. Hoffman
Area Director

Attachments:



Car Wash Safety and Health Hazards Fact Sheet

Common Car Wash Hazards

a. Chemical Exposure

- i. Pre soak: Alkaline soap used has a pH 13 - **Corrosive to eyes and skin.**
- ii. Tire shine: used at beginning or end of car wash via spray nozzles (pH 14) - **Corrosive to eyes and skin.**
- iii. Coatings/Rinses/Waxes applied on "Arch" - **Corrosive to eyes and skin**
 1. Polish water resistant coating for all surfaces.
 2. Rinsing agents for rinse process pH 3.5
 3. Wax containing pH 3-4.
 4. Chrome and wheel rim cleaning chemicals may contain hydrofluoric acid.
 5. Car wash laundries use household detergents and bleach to wash and dry hand towels
 6. Proper labeling of chemicals, labels should be clearly written so workers know how to safely use and what the safety and health hazards are.

Carlos/
Julio

iv. Airborne Toxicants

1. Chemical mists, emissions from diesel and gasoline engines (gases, vapors, fine particles) (**example: Carbon Monoxide**).
2. Other Emissions include:
 - a. Arsenic
 - b. Benzene
 - c. Formaldehyde
 - d. Nickel
 - e. Polycyclic aromatic hydrocarbons, complex mixture of volatile hydrocarbons (paraffins, cycloparaffins, and aromatics)

b. Mechanical Hazards

- i. Unguarded Moving Parts: all **moving and rotating parts of the machine** can result in **lacerations, amputations, and/or crushing.**

1. Conveyor system: chain system rotating on axes at the beginning and end of conveyor track with rollers that catch the car's wheel and may **cause injury to exposed extremities including amputation.**

ii. **Struck by and Crushing Hazards:**

1. **A full service system** has risk of **employees being crushed or struck** by customer/employee operated vehicles.

a. Workers can be struck by vehicles where:

- i. Vehicle **approaches/enters** the bay or tunnel.

- ii. Vehicle **disengages from the conveyor system** and is put into drive and/or driven out.

- iii. Vehicle **enters the Finishing/towel drying area**

- iv. **Sudden Unintended Acceleration Hazard:** Involves a sudden unintended acceleration of the vehicle driven either by the customer or an employee which **could result in hitting another employee.**

1. **Workers should be separated from areas where vehicles are driven.**

2. Employees should wear high **visibility clothing** so they can easily be seen.

3. Provide **clear instructions and directional signage** at the **Car Wash's entrance and exit areas.**

4. Provide **effective barriers** for worker protection against vehicular traffic.

5. Provide **designated areas** for workers that are remote from traffic flow.
 2. **Mitter curtain:** moves back and forth across the car surface.
 3. **Rotating scrubber brushes:** wrap around front, sides, and rear of car at high velocities.
 4. **Large cylindrical brush:** a top brush that rotates on an axle perpendicular to the car.
- iii. **Electrical Motors** contact with unguarded parts can result in **electrocution**.
 - iv. **Dryer-blowers:** high pressure, very hot, **could result in burning of skin**.
 - v. **Vacuums:** have a powerful air pump with several hoses; if hazardous materials are vacuumed, could **cause the vacuum to ignite and explode**.

c. Physical

- i. **Water, soap, wax and other chemical solutions,** may accumulate in areas of work, **causing employees to be susceptible to slip/trip/fall hazards**.
- ii. **Inclement Weather – Avoid heat and cold exposures.**
- iii. Hi pressure water jets operating up to 1,000 psi which can cause **pulmonary and cerebral embolisms**.

d. Personal Protective Equipment

- i. Engineer out hazards first. Personal Protective Equipment should be used to protect against hazards that cannot be eliminated or controlled through any other means.
- ii. Employees should be provided properly fitted personnel protective equipment; **such as safety glasses, gloves, and high visibility vests with reflective material to ensure employees are always visible**.
- iii. Personal protective equipment must be regularly inspected and maintained.

e. Noise Exposure:

- i. If it is suspected that noise levels exceed 85 decibels, employer must **evaluate, noise exposure and provide monitoring** results to employees.
- ii. If noise levels are above 85 decibels as an 8-hour time weighted average, the employer must **institute a hearing conservation program** which includes:
 1. Providing exposed workers with **hearing protection**
 2. Providing annual **audiometric testing**
 3. Providing **annual noise training**
- iii. If noise levels exceed 90 decibels as an 8-hour time weighted average the employer must **utilize feasible engineering and or administrative controls to reduce exposure**. Where these controls are not adequate, the employer **must provide and ensure employees wear appropriate hearing protection**.