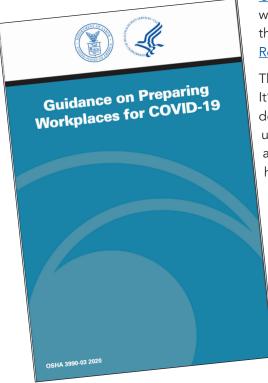
## OSHA STANDARDS HAVE ALWAYS REQUIRED HAND WASHING STATIONS

Now that hand washing is "a thing," changes are afoot on the job site. In some parts of the country, inspectors are entering job sites and requiring general contractors to provide hand washing facilities for their workers. This new awareness of hand washing during the COVID-19 pandemic is contributing to the current shortage of hand wash units available. It is frustrating for everyone.





## The Current Status of Hand Wash Unit Supply

As of April 2020, suppliers are ramping up hand wash unit production and expect deliveries of new units in three to five weeks. Meanwhile, portable sanitation operators have gotten creative about building temporary stations and modifying existing equipment, and they are finding all sorts of ways to meet their customers' needs.

Though the day may seem a long way off right now, it is certain that the supply of hand wash units will ultimately align with demand. In the process, a big question for operators buying more hand wash units is this: "Will I still need all this equipment when COVID-19 is over?"

The short answer is, "Yes, you absolutely should be able to up your hand washing game considerably from now on." That's because—even though the Occupational Safety and Health Administration (OSHA) has issued <a href="new COVID-19 guidance">new COVID-19 guidance</a> for preparing workplaces—the requirement for hand washing facilities is not new. It has always been in OSHA standards, as the PSAI has reported in numerous publications. (Check out our <a href="Industry Resource Library">Industry Resource Library</a> for some of them.)

The current shortage of hand wash facilities is not because of a new rule. It's because there is increased awareness among workers who are now demanding hand washing facilities to which they've always been entitled under the law. It is also due to increased enforcement by officials in some areas. So make note of the following information. It will help you promote hand washing stations now and going forward.

## OSHA and PSAI/ANSI Standards

In the chart on the next page, you'll notice that the PSAI/ANSI standard requires more than the OSHA standards. That is an excellence standard to which you can aspire, but it does not have the force of law.







## **Standards for Hand Washing Stations**

Standard	Covers	Toilets Required	Hand Wash Required
ANSI/PSAI Z4.3-2016	Anywhere non-sewered sanitation is needed	1 unit per 10 workers if serviced once a week	1 station per 10 toilets
OSHA 1926.51	Construction sites	1 unit per 20 workers which must be maintained in a sanitary condition	Each lavatory shall be provided with hot and cold running water or tepid running water, hand soap or similar cleansing product, and paper or cloth towels or a blow dryer
OSHA 1915.88	Shipyards	Units on a scale beginning with a 1:15 ratio	One unit at or adjacent to each toilet equipped as stated above.
OSHA 1918.95	Long shore workers	No specific number; the standard is that toilet facilities "sufficient for the sanitary requirements of employees shall be readily accessible at the worksite."	No specific number; the standard is that toilet facilities "sufficient for the sanitary requirements of employees shall be readily accessible at the worksite" and equipped as stated above.

In 2020–21 we will begin the regular five-year required update of the ANSI/PSAI standard which could well increase the hand washing requirements in the ANSI/PSAI standard. At the same time, all OSHA standards currently have the force of law. At a minimum, you should always be able to promote the levels of equipment and service listed in the OSHA standards which you can read in full on the OSHA Standards page of the PSAI website.

Prior to the COVID-19 emergency, portable sanitation companies sometimes got push-back from customers because the OSHA standards do have some "outs" that make them think they don't need to provide portable facilities. These mostly apply to mobile crews who can easily drive to sanitation facilities—typically a group of workers on the move throughout their day, perhaps inspecting lines.

Exceptions do not generally apply to job sites where everyone is in the same place. In fact, the existing OSHA rules specifically say these are the requirements for job sites in most cases. And where toilets are provided, the OSHA standards also require hand wash stations.

In short, facilities for hand washing is not a new OSHA requirement, and when COVID-19 has passed, the need will still be there. The awareness the pandemic has raised about this issue may be one of the better outcomes of this difficult time.