OSHA Regulations that affect Funeral Homes – Quick Tips



The Occupational Safety and Heath Administration (OSHA) has no standard specific to funeral homes. There are several regulations, however, within OSHA's Industry Standards Code of Federal Regulations (CFR) Title 29 Part 1910 that apply to funeral homes. This document reviews the standards funeral home operators must follow to maintain a safe work environment.

As of 2013, there are 19,486 funeral homes in the United States. As with any workplace, funeral homes present a variety of occupational hazards. Funeral-affiliated employers must address these hazards to ensure their employees have a safe work environment. The OSHA act states that each employer shall furnish to each of his employees a place of employment which is free from recognized hazards that are causing, or are likely to cause death or serious physical harm. It also requires that employers comply with occupational safety and health standards promulgated under OSHA.

Who's Covered By OSHA?

Any employer with one or more employees is covered, and can be cited under the OSHA Act of 1970. In addition, employers with 11 or more employees are required to comply with OSHAs Recording and Reporting Occupational Injuries and Illness (29 CFR 1904) requirements. Under 29 CFR 1904, employers are required to maintain occupational injury and illness records. The purpose of maintaining these records is to:

- Provide injury and illness information which is used by OSHA to measure and direct the agency's efforts
- Enable employees and employers to identify types and causes of injuries and illnesses at each establishment
- Make employers and employees more safety conscious
- Encourage employee and employer cooperation

(For more information on OSHA's recordkeeping requirements, refer to Quick Tips #183, OSHA Reporting Requirements.)

Funeral Homes and OSHA's General Industry Standards

A number of occupational activities performed in funeral homes fall under OSHA's General Industry Standards. These general industry standards are discussed in this document. Funeral home operators must be aware of the following regulations in order to stay compliant.

The Right-To-Know Law

The Right-To-Know Law, officially known as The Hazard Communication Standard 29 CFR 1910.1200 was enacted November 25,1983, by OSHA. Its purpose is to ensure that chemical hazards in the workplace are identified and evaluated, and that the information concerning these hazards is communicated to both employers and employees. This transfer of information is to be accomplished by means of a comprehensive hazard communication program that includes container labeling and other forms of warning including Safety Data Sheets (SDSs) and employee training. (Refer to Quick Tips #150 for detailed information on the Hazard Communication Standard and Quick Tips #374 on Globally Harmonized System (GHS).)

OSHAs Bloodborne Pathogens (BBP) Regulation (29 CFR 1910.1030)

This regulation applies to all individuals who may reasonably anticipate contact with blood or other potentially infectious bodily fluids in the course of their employment. This includes contact with skin, eyes, mucous membranes or contact from piercing the skin. The focus of the regulation is the creation of a written Exposure Control Plan that describes how the employer will protect employees from exposure *(See Quick Tips #105 for additional information on the BBP Standard.).*

Personal Protective Equipment (PPE) Standards

A key component of the PPE Standard is the hazard assessment of the work area as required under the General Requirements. According to OSHA, under 1910.132(d) Hazard Assessment and Equipment Selection states that the employer shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment. If the assessment determines that hazards are present, or likely to be present, the employer shall:

- Select and have each affected employee use PPE that will protect from the identified hazards
- Inform each affected employee of the selection decision
- Select PPE that properly fits each affected employee
- Document that the hazard assessment has been performed through a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed; the date(s) of the hazard assessment

In addition, the employer is also required to train the affected employees on the proper use of the selected PPE *(For more information on PPE Standard request Quick Tips #240).*

Respiratory Protection Program

This program ensures that all employees are properly protected from respiratory hazards. According to 29 CFR 1910.134, creating and maintaining an individualized written respiratory protection program is the responsibility of all employers who provide respirators to their employees. The program must be administered by a suitably trained program administrator.

When establishing a Respiratory Protection Program, the funeral home operator must first identify what airborne contaminants are present. The SDS required under the Hazard Communication Standard contains this important information. Once the contaminants are identified, the operator will need to conduct air monitoring to determine whether employee exposures exceed OSHA’s permissible exposure limit (PEL) for the identified contaminant(s). The established PEL(s) are also printed on the SDS.

If, after conducting the air monitoring, the employer determines contaminant concentrations are above the PEL, the employer must implement engineering controls (ventilation systems) or administrative controls (job rotations) to reduce the employee exposure. If neither of these options are feasible, the employer must then provide appropriate respiratory protection to the employee. Assigned respiratory protection must be approved by National Institute of Occupational Safety and Health (NIOSH) for the contaminant(s) present *(For more information on establishing a Respiratory Program refer to Quick Tips #195).*

Formaldehyde and Glutaraldehyde Regulations

Formaldehyde and glutaraldehyde are two common hazardous materials used in funeral homes. Formaldehyde use is regulated under a specific OSHA standard, 29 CFR 1910.1048 and was established to protect workers from occupational exposures to formaldehyde. It defines an Action Level, a PEL and a Short-Term Exposure Limit (STEL) for formaldehyde exposure in the workplace. The following are the established airborne concentrations for each of these levels:

- Action level: Airborne concentration of 0.5 parts per million (ppm) formaldehyde. If this level is exceeded, the employer must perform periodic air monitoring until the levels can be reduced below this point (29 CFR 1910.1048 (b))
- PEL: Airborne concentrations of 0.75ppm formaldehyde as an 8 hour time weighted average (29 CFR 1910.1048 (C)(1))
- STEL: Airborne concentration of 2ppm formaldehyde over a 15 minute time interval (29 CFR 1910.1048 (C)(2))

All employers who have any form of formaldehyde in the workplace must monitor employee exposure unless they can objectively document that the presence of airborne formaldehyde will not exceed the action level or STEL under foreseeable conditions (29 CFR 1910.1048 (d) (1)). If this cannot be done, the employer must begin monitoring.

Initial monitoring is accomplished by identifying all employees who potentially have an exposure at or above the action level or STEL. Each potentially exposed employee may be monitored, or a representative sampling plan implemented for each job classification and work shift. Monitoring must occur each time a change in equipment, process, production, personnel, or control measures is instituted (29 CFR 1910.1048 (d) (2)). If formaldehyde concentrations are revealed at or in excess of the action level, monitoring must be repeated every 6 months. If the monitoring shows levels at or above the STEL, annual monitoring is required (29 CFR 1910.1048 (d) (3)).

Monitoring can be discontinued if after two consecutive sampling periods (taken at least seven days apart) airborne concentrations are below both the action level and STEL (29 CFR 1910.1048 (d) (4)).

Glutaraldehyde, which is not covered under a specific OSHA standard, is still a hazardous material with established exposure limits. NIOSHs recommended exposure limit (REL) for glutaraldehyde is a ceiling limit of 0.2 ppm. This exposure level should not be exceeded at any time.

Another organization that establishes chemical exposure limits is the American Conference of Governmental Industrial Hygienists (ACGIH). The ACGIH has reduced their ceiling limit to a more conservative level of 0.05 ppm *(Additional information on glutaraldehyde awareness is available on Quick Tips #174).*

Eye/Face and Wash/Shower Requirements

When it comes to emergency eye/face wash and shower requirements, OSHA has two different types of regulations, general and specific. Funeral homes fall under the general requirements that are located in OSHA's First Aid Standard under 29 CFR 1910.151(c). This standard states where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the area for immediate emergency use.

The performance guideline for emergency drenching equipment that OSHA recognizes is the American National Standards Institute's (ANSI) Z358.1-1998. This Emergency Eye Shower and Wash Equipment standard aids employers in selecting and installing emergency equipment to meet OSHA requirements *(For more information on this ANSI standard see Quick Tips #120).*

Medical and First Aid Regulations

In 1998, OSHA revised its Medical Services and First Aid regulation, 29 CFR 1910.151. The revision states; In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid. Adequate first aid supplies shall be readily available. Included in the revision was Appendix A, a non-mandatory guideline that contains examples of minimal contents for first aid kits.

This appendix is taken from the ANSI Z308.1-1978, Minimum Requirements for Industrial Unit-Type First Aid Kits; it identifies the fill content that should be adequate for small worksites. The employer is responsible for determining the need for additional first-aid kits, quantities and the types of supplies at the worksite for large/larger worksites *(Quick Tips #208 has more information on first aid kits.).*

Chemical Compatibility Concerns in Storage

Chemicals play an important role in many workplace applications. The inherent hazards of chemicals can be reduced by minimizing the quantity of chemicals on hand. However, when chemicals must be in-house, proper storage and handling can reduce or eliminate the associated risks.

Proper storage information can usually be found on the chemical's SDS. The SDS will answer questions such as:

- Is the chemical a flammable or combustible?
- Is the chemical a corrosive?
- Does the chemical need to be stored at a temperature other than ambient?
- Is the chemical an oxidizer or reducer?
- Is the chemical light sensitive?
- Does the chemical require any special handling procedures?

Proper segregation of chemicals is necessary to prevent incompatible materials from inadvertently coming into contact with each other. If incompatible materials come into contact, a fire, explosion, violent reaction or the creation of toxic gases can result.

When segregating chemicals, acids should not be stored with bases and oxidizers should not be stored with reducing agents or organic materials. A physical barrier and/or distance is effective for proper segregation.

If cabinets are used to segregate chemicals, consider the compatibility of the chemicals with the cabinet itself. For example, corrosives like strong acids and caustics will corrode most metal cabinets. Non-metallic or epoxy-painted cabinets are

available and will provide a better service life with these corrosive materials.

Safety cabinets are specifically made to maintain flammable and combustible materials. It’s important to be aware of maximum allowable container size and maximum quantities for storage in cabinets based on the class of the flammable. The class of a flammable or combustible is determined by its flash point and boiling point *(For more information on flammable and combustible liquids, see Quick Tips #179 and Quick Tips #180).*

Disposal of Hazardous Waste

The disposal of hazardous waste varies from State to State and even between municipalities within the State. To validate that you are in compliance within your local requirements, you may want to contact your waste-water treatment plant.

While this document identifies the OSHA standards that apply to funeral homes, additional guidance may be necessary in interpreting how these standards apply to a specific situation. Your state OSHA Consultation Project (see *Quick Tips #185*) and the National Funeral Directors Association (NFDA) are resources for this information. The NFDA has an OSHA Support Line that’s available to its members.

For information on NFDA membership, you can access their website at http://nfda.org/about-nfda-/membership-information.html or call 1-800-228-6332.

Sources

Federal Trade Commission’s Funeral Customer’s Guide Resource

American Board of Funeral Services Education

OSHA

Bureau of Labor Statistics

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