Sanitation

KATHI DOBSON & KAREN MITCHELL
Sanitation

One of the biggest (most vocal) issues

Addressed mid 90’s (ACCSH – HASWIC/NIOSH/CWIT) and mid 2014 (NAWIC independent survey)

Issues related to portable toilets

- Privacy
- Real estate
- Sanitizing – soap & water
- Unisex
- Disposal of sanitary products
How big an issue is sanitation in construction?

1998
HASWIC Report to the ACCSH of OSHA

2014
NAWIC Survey of Membership

2021
Issues continue – especially for workers in the field
Be it resolved that the Construction Sanitation Standard has not been updated in any significant way since OSHA adopted it pursuant to section 6(a) of the OSH Act;

And be it resolved that the Construction Sanitation Standard is out-of-date;

And be it resolved that ACCSH has repeatedly recommended that OSHA update its Construction Sanitation Standard, but the Agency has not taken any action to do so;

And be it further resolved that lack of appropriate, clean and sanitary sanitation facilities has become a barrier to the entry and retention of women in the construction industry;

Therefore, I move that ACCSH again strongly recommend that OSHA put at the top of its regulatory priority the updating of its Construction Sanitation Standard, including updating the requirements on the number of toilet facilities construction employers must provide and updating the requirements to provide separate facilities for male and female workers;

And I further move that OSHA provide ACCSH with an update at every ACCSH meeting until OSHA has promulgated a final rule updating the Construction Sanitation Standard.
Problems With OSHA’s Standard

OSHA defines, and says (1926.51)(c) toilets shall be furnished according to the (overly) complicated OR simplistic table D-1

OSHA does NOT define cleaning schedules

And -1926.51(f) addressed washing and lavatories...which SHALL be provided for employees engaged in the application of paints, coating, herbicides, or insecticides, or in other operations where contaminants may be harmful to the employees. Such facilities shall be in near proximity to the worksite and shall be so equipped as to enable employees to remove such substances. Which RARELY are provided...
# Portable & Fixed Toilet Facilities

## OSHA’S SOLUTION

### OSHA 1926.51 – Table D1

<table>
<thead>
<tr>
<th>Workers</th>
<th>Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>20 or less</td>
<td>One (1)</td>
</tr>
<tr>
<td>20 or more</td>
<td>1 toilet seat + 1 urinal per 40 workers</td>
</tr>
<tr>
<td>200 or more</td>
<td>1 toilet seat + 1 urinal per 50 workers</td>
</tr>
</tbody>
</table>

## A10 (10.25)REV 2017

### A10.25 – Table 1

<table>
<thead>
<tr>
<th>Workers</th>
<th>Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 to 10</td>
<td>1 toilet seat</td>
</tr>
<tr>
<td>11 or more</td>
<td>1 toilet seat + 1 urinal per 10 workers</td>
</tr>
<tr>
<td></td>
<td>Employers are encouraged to provide separate facilities designated for female use only</td>
</tr>
</tbody>
</table>
one toilet seat and one urinal for every 40 workers
2003 – California Section 1527

Amended to require provision of washing stations for all construction employees. Washing stations must be provided so that there is a minimum of one washing station for each twenty employees or fraction thereof.

This is the same ratio as that required for provision of toilets in construction as required by Title 8 Section 1526. The basic requirements for washing stations for general sanitation and for hazardous materials in the construction industry are that they:

- Be maintained in a clean and sanitary condition.
- Have an adequate supply of water for effective washing.
- Provide soap or other suitable cleansing agent.
- Provide single-use towels or a warm-air blower.

The washing station must be located so that any time a toilet is used the user can readily wash.

The amended rule includes special provisions when washing stations are provided in association with portable toilets. These are:

- Provide a sign or equivalent notice indicating that the water is intended for washing.
- Locate the washing station outside of the toilet facility and not attached to it, except on worksites where there are less than 5 employees and only one toilet facility is provided, in which case the washing station may be located inside of the portable toilet room.
Evolution and Successes

OSHA – dedicated site (www.osha.gov/doc/topics/women/index.html)

◦ OSHA/NAWIC Alliance

ASSE – WISE common interest group (www.asse.org/practicespecialties/wise/)

NAWIC – (www.nawic.org)


CPWR – (http://www.cpwr.com/sites/default/files/publications/CB%20page%202020.pdf)