

# TerranearPMC Safety Share

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## Week of April 23, 2018 – Sanitation and Toilets

Every so often, I am asked a question regarding those portable toilets, commonly referred to as “port-a-johns” that are used at project sites. Typical questions revolve around the number needed at a site and whether there need to separate facilities for male and females.

OSHA regulations for portable toilet facilities can be found at 29 CFR 1910, Subpart J: General Environmental Controls – paragraph 141, “Sanitation” as well as under the Hazardous Waste Operations and Emergency Response (aka HAZWOPER); 29 CFR 1910.120 (and the OSHA HAZWOPER Standard for the Construction Industry; 29 CFR 1926.65). For persons working in Shipyards, the OSHA standard, 29 CFR 1915.97 addresses these conditions as well.

First and foremost, regulations require that each work site shall have an adequate supply of potable water. And just so we all understand, potable water means water for human consumption, which is fit for drinking. And therefore non-potable water is water that is not fit for drinking; however, this supply can be used for other purposes. These include rainwater from tanks which can be used for cooling towers and car washing, dust suppression and agricultural waste water used for crop irrigation.

When it comes to those portable outhouses, OSHA does stipulate that they must be clean and accessible. In addition, employees are not allowed to consume food or beverages in these units and – of course - food or beverages shall not be stored in there as well.

Toilet facilities need to be readily available, sanitary and adequately equipped with toilet paper and running water for washing up. In recent years, waterless soap/disinfectant has been used to address health concerns related to washing after using toilet facilities.

For permanent locations, OSHA requires that a minimum number of toilet facilities need to be available based on the number of employees at a permanent work site. The table below illustrates the number of units per site employees:

Number of Employees	Minimum Number of water Closets
1 - 15	1
16 - 35	2
36 - 55	3
56 - 80	4
81 - 110	5
111 - 150	6
Over 150	6 + additional facility for each 40 employees

In addition, the number of facilities to be provided for each gender shall be based on the number of employees of that gender for whom the facilities are furnished.

Where toilet rooms will be occupied by no more than one person at a time and the facility can be locked from the inside and contain at least one water closet, separate toilet rooms for each gender is



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NOT a requirement. Where such single-occupancy rooms have more than one toilet facility, only one such facility in each toilet room shall be counted for the purpose of the above table (29 CFR 1910.141(c)).

Where toilet facilities will NOT be used by women, urinals may be provided instead of water closets, except that the number of water closets in such cases shall not be reduced to less than  $\frac{2}{3}$  of the minimum specified. This means that if a site has 20 males (with no women assigned), 1 urinal may be provided while  $\frac{2}{3}$  of 2 water closets (or at least 1 additional water closet) is acceptable (1 urinal and 1 full water closet). While this may meet regulatory requirements, most businesses would *probably* maintain 2 water closets in addition to the extra urinal.

Each water closet shall occupy a separate compartment with a door and walls or partitions between fixtures sufficiently high to assure privacy.

With regards to general health, OSHA specifies that the sewage disposal method shall not endanger the health of employees.

Lavatories shall be made available in all places of employment. Each lavatory shall be provided with hot and cold running water, or tepid running water. Hand soap or similar cleansing agents shall be provided. Individual hand towels or sections of cloth or paper, air blowers or clean individual sections of continuous cloth toweling, convenient to the lavatories, shall be provided. However, OSHA does state that these requirements do not apply to mobile crews or to normally unattended work locations so long as employees working at these locations have transportation immediately available to nearby toilet facilities which meet these specifications. Therefore, temporary work sites that have access to outside facilities, do NOT need to have cloth toweling, air blowers, hand soap (or other cleansing agents) as well as hot and cold or tepid running water available.

For temporary work locations, the accommodations change:

Number of Employees	Number of Facilities
20 or fewer	1
More than 20 but less than 200	1 toilet seat and 1 urinal per 40 employees
More than 200	1 toilet seat and 1 urinal per 50 employees

As per the HAZWOPER standard: 29 CFR 1910.120

At no time shall there be less than one toilet facility available! Meanwhile, hazardous waste sites, not provided with a sanitary sewer, shall be provided with either chemical toilets, recirculating toilets, combustion toilets or flush toilets - unless prohibited by local codes:

FYI, for those not familiar with “combustion toilets,” these units are a type of dry toilet that burns human feces instead of flushing them away with water, like a flush toilet does. They are used in environments where human waste cannot be otherwise dumped, or where normal toilets are too expensive or cumbersome to install. Such toilets gather excrement in a holding tank and then incinerate it, reducing it to pathogen-free ash.

**Nothing will work unless you do** - Maya Angelou

