

November 2020

Top 5 Compliance Challenges for Auto Repair Facilities

Auto repair is a complex business, with intense deadlines and constant customer pressure. Facilities also have to adhere to complicated, ever-changing rules, regulations and guidance from OSHA, EPA, DOT, CDC and other agencies. Lapses in compliance can result in fines, business interruptions and injuries.

Gathered from 30 years of experience and data from more than 2,500 facilities that we are protecting, here is a compliance checklist for auto repair facilities. We recommend watching these areas closely to ensure that your shop is in compliance.

1. **Chemical Management**

The detail and paperwork involved to remain in compliance under OSHA's Hazard Communication rules is daunting. In fact, last year this was the top area of citation for dealerships and repair shops.

Auto repair facilities are required by OSHA's Hazard Communication standard 1910.1020 to keep a record on every chemical ever used for 30 years. This includes obvious hazards like poisons, solvents and compressed gases, as well as other items such as disinfectants, adhesives and paints. The average auto repair facility has more than 200 substances that fall into this category. Many shops accidentally leave things off their chemical inventory list, or neglect to obtain the SDS from the manufacturers. All safety data sheets must also be easily accessible to employees and first responders. An accurate inventory and robust database are critical.

In addition, containers must be labeled very specifically under standard 1910.1200. This includes many areas that shops often miss, such as containers in parts or spray gun wash stations. Even secondary containers such as spray bottles of water must be properly labeled.

2. **Training and Onboarding**

Training requirements are vast, and include Right to Know, safety data sheets, hazardous waste handling and transportation, PPE and respiratory protection, welding safety, emergency response,

November 2020

fire prevention, bloodborne pathogens, lockout/tagout, facility specific safe practices, OSHA form 300, 300A and 301, NESHAP 6H, forklift and others. To make it even more complex, a typical automotive dealership might have 50+ employees, each of them with different timelines for mandatory refresher training.

New employee onboarding is even more of a challenge. Before a new hire ever steps foot in the shop, he or she is supposed to be trained on every chemical he may be exposed to, every repair procedure he may perform, every tool he will use, every PPE he is required to wear, how to respond to an emergency, how to respond to a spill, how to identify emergency warnings, and how to dispose of waste. In addition, management-specific training is needed in areas such as compliance in record keeping, accident investigation, emergency response, handling inspections and more.

Finally, all training needs to be well-documented, including an agenda of what was reviewed, a signed attendance sheet from employees and the date the training occurred. Keeping up with training is necessary. Doing it well and getting it done without interrupting your business is essential.

3. **COVID-19 Response**

Keeping employees and customers safe is vital. And so is protecting your business. While other issues on this list have existed for years, the pandemic has introduced a whole new set of challenges for auto repair facilities.

A cluster or outbreak is not only dangerous, it can wreak havoc on your business. Sick employees, lost revenue and nervous customers are just some of the issues. Having a solid response plan in place in order to quickly and effectively respond to an employee infection is critical to avoiding this situation.

Creating an effective communicable disease prevention plan, developing additional employee training modules, managing new regulations, sorting through constantly changing information,

November 2020

and ensuring that processes and procedures are followed has become yet another area for facilities to manage. In fact, California OSHA just announced a [new set of standards](#) that all businesses must now follow, and there are 23 different state OSHA plans covering the private sector that may introduce their own unique regulations soon.

4. **Keeping up with Regulatory Changes and Renewals**

Auto repair facilities not only have a plethora of regulations to follow, but these regulations are continually changing and shifting. On top of that, OSHA, EPA, DOT, CDC and other agencies frequently issue temporary guidance documents that must be followed—often with very little advance notice. These changes impact training, processes and record keeping. Missing just one of these changes and failing to adjust can be costly.

Changes also impact required postings on topics such as EEOC, Minimum Wage, Unemployment Compensation, Reemployment Rights, Workplace Discrimination and Harassment, Paid Sick Leave, Occupational Safety and Health, Whistleblower Protection, and many others. As a result, some shops spend unnecessary time and money updating postings, while others miss updates, resulting in non-compliance issues.

Beyond keeping up with changes, auto repair facilities have to ensure that permits, licenses, reports and other federal, state and local requirements are properly filed and regularly renewed. Keeping excellent records, monitoring for changes, and making ongoing adjustments are requirements for success.

5. **Maintaining Written Programs**

Written plans and programs are required in multiple areas such as hazard communication, respirator evaluations and testing, emergency action, injury and illness prevention, record keeping, lockout/tagout, forklifts and hazardous material transport.

Industry specific job hazard analysis documents and mitigation programs must also be in place and reviewed and updated regularly. All hazards should be identified, and appropriate



Your Compliance Department Management Bulletin

GMG EnviroSafe

ALERT

November 2020

engineering controls, administrative controls, and personal protective equipment must be created and followed.

In addition to written programs and controls, auto repair facilities have to maintain various inspection logs. For example, eye wash units and hazardous waste stations need to be inspected weekly. Written programs, controls and detailed inspection logs are crucial to protecting your employees and your business.

Compliance can be a tremendous burden for most auto repair facilities. Handling it all in-house can take significant resources and negatively impact productivity. And a failure to comply can generate fines, cause business interruptions and increase injury risks.

The good news is that these elements can be painlessly outsourced, and it costs a lot less than you might think. GMG EnviroSafe provides complete programs to the auto repair industry, including documentation, training, databases and testing services. All supported by easy to use tools and in-person consultation and support. If you'd like to learn more about how we can help you protect your employees, your business and your community, we invite you to [click here](#) to get pricing and options.