



INTEROFFICE MEMORANDUM
Oregon Occupational Safety & Health Division

July 30, 2002

TO: All OR-OSHA
FROM: Marilyn K. Schuster, Standards and Technical Resources Manager
SUBJECT: Waterless Hand Sanitizer Use in Agriculture

During several recent field sanitation inspections the employers indicated that they had received training from an outside source stating that waterless hand sanitizers are acceptable alternatives to handwashing facilities. Waterless hand cleaning systems are not allowed in lieu of handwashing facilities. Under OAR 004-1110 handwashing facility is defined as "either a basin, container, or outlet with an adequate supply of potable water, soap and single-use towels. In addition, 004-1105(3)(A) requires every agricultural work area to have potable water for drinking and washing and 004-1105(5) requires adequate facilities or supplies for cleaning hands.

The rationale behind the requirement for soap and water when adopting the Field Sanitation for Hand Labor Work was the serious risk faced by workers exposed to chemical residues, pathogenic organisms and embedded dirt. Without access to running water and soap to wash hands it is much more likely that these chemicals and pathogenic organisms will be ingested or absorbed through the skin causing infection and illness.

Waterless hand cleaners have been allowed in very specific situations when freezing conditions, made other handwashing facilities impractical. Waterless hand cleaners are of course good to have as a supplemental hand cleaning means for employees but not in lieu of an adequate supply of water and soap.