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OSHA Standards Interpretation and Compliance Letters

03/23/2001 - A sink-on-a-drum style parts cleaner is a dip tank.

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- ✂ **Record Type:** Interpretation
 - ✂ **Standard Number:** [1910.123\(a\)](#); [1910.123\(b\)](#)
 - ✂ **Subject:** A sink-on-a-drum style parts cleaner is a dip tank.
 - ✂ **Information Date:** 03/23/2001
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March 23, 2001

Mr. Gavin Burdge
Corporate Industrial Hygienist
Safety-Kleen
1301 Gervais St., Suite 300
Columbia, SC 29201-3326

Dear Mr. Burdge:

Thank you for your October 11, 2000 letter to the Occupational Safety and Health Administration's (OSHA's) Directorate of Compliance Programs (DCP). This response to your letter is OSHA's interpretation of the question you asked and may not be applicable to any questions not delineated in your letter. Your specific question addressed the coverage of §1910.123 (***Dipping and Coating Operation: Coverage and Definitions***) when using a sink-on-a-drum parts cleaner.

Question: Does a sink-on-a-drum style parts cleaner constitute a dip tank under OSHA's rule for dip tanks, specifically 1910.123(a)?

Reply: Yes. Paragraphs (a) and (b) of §1910.123 read:

(a) Does this rule apply to me?

(1) This rule (§§1910.123 through 1910.126) applies when you use a dip tank containing a liquid other than water. It applies when you use the liquid in the tank or its vapor to:

- (i) Clean an object;
- (ii) Coat an object;
- (iii) Alter the surface of an object; or
- (iv) Change the character of an object.

(2) This rule also applies to the draining and drying of an object you have dipped or coated.

(b) What operations are covered?

Examples of covered operations are paint dipping, electroplating, pickling, quenching, tanning, degreasing, stripping, cleaning, roll coating, flow coating, and curtain coating."⁽¹⁾

OSHA considers the operation you described (i.e., pumping a solvent through a brush to coat and clean parts in a sink-on-a-drum parts cleaner) to be a flow-coating operation. Also, the Agency believes that the solvent-coated parts would most likely be left in the sink for draining and drying. Therefore, paragraphs (a)(1)(i), (a)(2), and (b) of §1910.123 make this operation subject to the requirements of the new Dip Tank Standard. Also, paragraphs (a)(1)(i), (a)(2), and (b) of §1910.123 invalidate OSHA Instruction STD 1-5.5 (***Sinks Used for Cleaning Operations***) which states that parts-washing sinks are not dip tanks; clearly, such an interpretation is now obsolete under paragraphs (a)(1)(i), (a)(2), and (b) of §1910.123. Accordingly, the Agency recently issued OSHA Notice 01-02 STD 1-5, which canceled OSHA Instruction STD 1.5.5; for your information, we included a copy of this notice with this letter.

Thank you for your interest in occupational safety and health. We hope you find this information helpful. If you have any further questions, please feel free to contact the Office of General Industry Compliance Assistance at (202) 693-1850.⁽²⁾

Sincerely,

Richard E. Fairfax, Director
Directorate of Compliance Programs

Enclosure

Footnote (1) *Federal Register* (64 FR 13897, March 23, 1999):
Preamble, Section II, Summary and Explanation of the Final Rule. ([Back to text](#))

Footnote (2) Please note that OSHA requirements are set by statute, standards, and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. This letter constitutes OSHA's interpretation of the requirements discussed. Note that changes in OSHA rules may affect our enforcement guidance. Also, from time to time we update our guidance in response to new information. To keep apprised of such developments, you can consult OSHA's website at www.osha.gov. ([Back to text](#))

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