

South Carolina Department of Labor, Licensing and Regulation
Division of Labor
Office of Occupational Safety and Health
Columbia, South Carolina 29211

OSH Program Directive Number 80-1910.37-1 (REVISED)

Subject: Acceptability of Self-Luminous Exit Signs (Tritium or Other Radioactive Isotope Energized) Under Article VI, Section 1910.37 (q).

Standard: Article VI, Section 1910.37 (q) (6) and (q) (8), Rules and Regulations, Commissioner of Labor, State of South Carolina.

Cross Reference to Federal Standards: 29 CFR 1910.37 (q) (8).

Background: The existing Rules and Regulations of the Commissioner of Labor, State of South Carolina, particularly Section 1910.37 (q) (6), require the exit signs be externally illuminated to a value of not less than five foot candles. There have been requests to accept self-luminous exit signs and electrical internally illuminated exit signs. On the basis of the source standard, NFPA 101-1970, no luminescent, fluorescent, or reflective material can be accepted as a substitute for the required external illumination. The source standard committee has not recommended any change in the mentioned provision for the 1973 revision. Provided the minimum external illumination (5 foot candles on surfaces) requirements are met, exit signs can be passive, fluorescent, reflective, self-luminous, or electrical internally illuminated. This directive replaces Program Directive number 74-1910.37-1 (formerly OSH P. D. #74-16-1).

Interpretation: The Occupational Safety and Health Administration, U. S. Department of Labor, is presently preparing a recommended proposed rule-making covering several modifications to Federal Standards Subpart E. In the subject area of exit signs and their illumination, federal OSHA and the S. C. Division of OSH plan to follow the revisions to the source standard as follows:

- a) In Article VI, Section 1910.37 (q) (6), deletion of the last sentence which removes the requirements for a colored location indicating light.
- b) No change in Article VI, Section 1910.37 (q) (7). This section requires electrical internally illuminated exit signs in occupancies such as theaters where reduction of normal illumination is

permitted, and makes no mention of their use in other occupancies. The pertinent source standard provisions had an added clause, “and may be used in any occupancy” which was interpreted by many that such signs were fully alternate to the illuminated signs required by Section 1910.37 (q) (6). The NFPA 1973 Revisions show deletion of the clause, “and may be used in other occupancies”. It will be made clear that all exit signs are required to have the external illumination required by Section 1910.37 (q) (6), except for the occupancies stipulated in Section 1910.37 (q) (7) such as theaters.

- c) An exception to Section 1910.37 (q) (8), permitting existing externally illuminated signs to have letters not less than 4 ½ inches high, other than in place of assembly. This exception is to recognize that the 1967 Edition of the source standard accepted 4 ½ inch high letters for internally illuminated exit signs as alternates to externally illuminated types provided they were equivalent in visibility. All new signs must have six inch letters.

Until the Commissioner of Labor implements the Revisions of the source standards by promulgating a final Revision in Rules and Regulations of the Department of Labor, violations of Section 1910.37 (q) (6) and (q) (8), may be subject of de minimis violation notices where the Assistant Director/OSH Compliance determines that the relationship has no direct relationship to safety or health.

Effective Date: This instruction is effective upon receipt and will remain in effect until cancelled or superseded by amendment to the Rules and Regulations.

William M. Lybrand
August 1, 1980