

**North Carolina Department of Labor  
Division of Occupational Safety and Health**

**Raleigh, North Carolina**

Field Information System

Standards Notice 9A

**Subject:** Determining Hazardous (classified) Locations in unventilated pits or depressions below grade in commercial garages.

**A. Standards.**

1. 29 CFR 1910.307 – Hazardous (classified) Locations. (a) Scope – This section covers the requirements for electric equipment and wiring in locations which are classified depending on the properties of the flammable vapors, liquids or gases, or combustible dusts or fibers which may be present therein and the likelihood that a flammable or combustible concentration or quantity is present. Each room, section or area shall be considered individually in determining its classification. For definitions of these locations, see 29 CFR 1910.399 (a).
2. 1999 National Electrical Code [511-3(b)] states, “Any pit or depression below floor level shall be considered to be a Class I Division 1 location which shall extend up to said floor level, except that any pit or depression in which six air changes per hour are exhausted at the floor level of the pit shall be permitted to be judged by the enforcing agency to be a Class I Division 2 location.”

**B. Discussion.**

The OSHNC electrical standards do not specifically address pits and depressions in commercial garages. However, 29 CFR 1910.399(a)(24), defines Class I, Division 1 and 2 locations. The definitions allow the use of ventilation systems to prevent hazardous atmospheres from accumulating. This permits classifying a pit or depression Class I, Division 2 instead of Class I, Division 1. The OSHNC standards are consistent with the requirements in the NEC Article 511.

**C. Interpretation.**

CSHO’s should not depend solely on the absence of motor repairs to indicate an area is not classified. Areas of automotive repair and service facilities where major repair or body and fender work is performed are classified (adjacent areas may be classified) and must be evaluated pursuant to the applicable standards. Normally, parking garages used for parking or storage where no repair work is done except exchange of parts and routine maintenance requiring no use of electrical equipment, open flame, welding or the use of volatile flammable liquids are not classified. NFPA 88A provides construction and protection requirements for parking garages.

CSHO’s will follow the guidance provided in the NEC and the OSHA standards. Where equipment unacceptable for the appropriate Class I location is installed or used in a garage pit or depression, it will be cited under 29 CFR 1910.307.

SN 9A cont'd.

D. **Effective Date.**

Standards Notice 9 is canceled. This SN is effective on the date of signature. It will remain in effect until revised or canceled by the Director.

Signed on Original  
Kevin O'Barr  
Safety Standards Officer

Signed on Original  
Allen McNeely  
Director

8/09/05  
Date of Signature