

## Stylist Article – August 2015

### Client Tools

Occasionally, a client will insist upon bringing their own tools into an establishment with the intent that these tools be used on them during a service. While there is nothing in the Board's regulations that prohibits this practice, licensees need to be aware that customer-provided tools must be treated like any other tool in the shop and are subject to the same rules. That means that the disinfection procedures detailed in Section 979 of the California Code of Regulations must still be performed *before* the tools are used on a client. Those procedures are:

- (a) Before use upon a client, all non-electrical tools that can be disinfected, excluding shears, shall be disinfected in the following sequential manner:*
  - (1) Remove all visible debris.*
  - (2) Clean with soap or detergent and water.*
  - (3) Completely dry tools with a new, clean paper towel.*
  - (4) Then totally immerse in an EPA-registered disinfectant with demonstrated bactericidal, fungicidal, and virucidal activity, used according to manufacturer's instructions.*
  - (5) Licensees or students shall wear protective gloves or use tongs when removing tools from the disinfectant.*

Using your client's tools without first performing the steps listed above means that the tools have not been disinfected according to law. Don't assume they're clean.

Some establishments will not only allow customers to bring their own tools, but allows the tools to be stored at the establishment as well. This practice is not recommended by the Board. These tools are subject to the same rules as the establishment's when it concerns how they are stored when soiled or clean. Again, refer to Section 979 of the California Code of Regulations, which states:

- (c) All tools used on a client or soiled in any manner shall be placed in a container labeled "Dirty", "Soiled", or "Contaminated".*
- (d) All disinfected tools shall be stored in a clean, covered place which is labeled "Clean" or "Disinfected".*

A violation of these regulations could result in a fine of \$100, \$250 or \$500, depending on the number of prior offenses.

As a reminder, licensees may not save and re-use non-disinfectable items, such as, emery boards or buffers, on the client. These types of items are for one-time use on a client and should be immediately discarded after use. Failure to do so could lead to fines of \$100 to \$200.