

# Don't forget Silica

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# What we will cover

- What does the final rule require?
- Where do we go from here?

# Silica Promulgated

- Published on March 25, 2016
- Effective date: June 23, 2016
- Two rules:
  - General Manufacturing
  - Construction

# Compliance time

- General Manufacturing: June 23, 2018
- Construction: June 23, 2017
- Monitoring and planning needs to start NOW!

# What do the Rules Look Like?

- General manufacturing:
  - Permissible Exposure Limit: 50 ug/m<sup>3</sup>
  - Action Level: 25 ug/m<sup>3</sup>
- Construction
  - General manufacturing PEL/AL, OR
  - Work Practice Tables

# To Demonstrate Compliance with PEL/AL

- Initial exposure assessment
- Reassessing exposure
- Define **regulated areas**
- Compliance plan

# Initial Exposure Assessment

- For each employee based on:
  - Air monitoring
  - “Objective data”
- “Representative” sample of worst case exposure



# Reassessing Exposure

- Scheduled monitoring frequency based on results of initial
- Must be reassessed with change in operation/process/controls/personnel/other factors that could “reasonably” be expected to change exposure



# Define Regulated Areas

- Wherever exposure to RCS is or can reasonably be expected to be over PEL
- Must mark off areas in a manner that minimizes number of employees exposed
- Restrict access
- Provide respirators

# Compliance Methods

- Engineering and work practice controls, unless you demonstrate that these are not feasible
- Written exposure control plan
- Respiratory protection
- Housekeeping restrictions

# Medical Surveillance

- Required for all employees exposed above the AL
- Required by 2018 for employees exposed above PEL
- Free of charge
- Limits on information shared

# Construction Rule- Key Points

- Separate Rule
- Compliance due June 23, **2017**
- Can comply with work practice table rather than PEL-based requirements
- ***Written exposure plan*** must be implemented by ***competent person***

# Construction Rule

TABLE 1—SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA

Equipment/task	Engineering and work practice control methods	Required respiratory protection and minimum assigned protection factor (APF)	
		≤4 hours/shift	>4 hours/shift
(i) Stationary masonry saws .....	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None .....	None.
(ii) Handheld power saws (any blade diameter).	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions: —When used outdoors .....	None .....	APF 10.
	—When used indoors or in an enclosed area .....	APF 10 .....	APF 10.
(iii) Handheld power saws for cutting fiber-cement board (with blade diameter of 8 inches or less).	For tasks performed outdoors only: Use saw equipped with commercially available dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency.	None.	None.
(iv) Walk-behind saws .....	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions: —When used outdoors .....	None .....	None.
	—When used indoors or in an enclosed area .....	APF 10 .....	APF 10.
(v) Drivable saws .....	For tasks performed outdoors only: Use saw equipped with integrated water delivery system that continuously feeds water to the blade.	None .....	None.

# What is happening now?

- Litigation
- Compliance
  - Preliminary assessment and planning
  - Hoping to work with OSHA on their manuals



# **One Company's Story**



# Questions?

- (add contact info)