

**STANDARD PRACTICE INSTRUCTION**

**DATE:** January 15, 2018

**SUBJECT:** Respirable Crystalline Silica Exposure Control Policy

**REGULATORY STANDARD:** OSHA - 29CFR1926.1153 (Silica)  
OSHA – 29CFR1910.1053 (Silica)  
OSHA – 29CFR1910.1200 (HazCom)

**BASIS:** The purpose of this respirable crystalline silica compliance policy is to help ensure that worker exposure levels to respirable crystalline silica are accurately assessed, and that workers are not exposed to respirable crystalline silica at levels that are above the Permissible Exposure Limit (PEL) of 25 micrograms per cubic meter of air (25 µg/m<sup>3</sup>) calculated at a 8-hour Time-Weighted Average (TWA). The measured concentrations of respirable crystalline silica (above, at, or below the PEL) will dictate which compliance procedures described in this policy will be implemented.

**GENERAL:** In construction, OSHA requires a written Silica Exposure Control Policy when employers elect NOT to comply with Table 1 of 29CFR1926.1153. Currently, Schlosser & Associates Mechanical Contractors, Inc. will follow the Table 1 compliance guide, therefore effectively ensuring exposure will stay below the action level of 25 µg/m<sup>3</sup>. Any variation from the table must be reviewed by the company to determine appropriate exposure prevention methods.

**RESPONSIBILITY:** The company Safety Officer is solely responsible for all facets of this policy and has full authority to make necessary decisions to ensure success of the policy. The Safety Officer will develop written detailed instructions covering each of the basic elements in this policy, and is the sole person authorized to amend these instructions. This company has expressly authorized the Safety Officer to halt any operation of the company where there is danger of serious personal injury.

### **Contents of the Respirable Crystalline Silica Policy**

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- 3. Engineering Controls and Work Practice Control Methods (Table 1).**
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**Schlosser & Associates Mechanical Contractors, Inc.**  
**Respirable Crystalline Silica Policy**

## **1. Applicability**

1.1 This Written Exposure Control Policy applies to Schlosser & Associates Mechanical Contractors, Inc. personnel who are potentially exposed to airborne concentrations of respirable crystalline silica (silica) because of their work activities or proximity to the work locations where airborne silica is being emitted. This policy also applies to Schlosser & Associates Mechanical Contractors, Inc. superintendents, foremen, or safety personnel who may be responsible for overseeing a subcontractor's operations that have the potential to expose personnel to airborne concentrations of silica at or above regulatory and industry action levels and exposure limits.

## **2. Tasks in the Workplace**

2.1 Listed Below are descriptions of tasks in the workplace that involve exposure to Silica. These tasks include, but are not limited to:

2.1.1 Use of stationary masonry saws used to cut concrete, tile, concrete masonry block, sheet rock, gypsum fiber roof board, or any other product containing quartz.

2.1.2 Handheld power saws used to cut concrete, asphalt, concrete masonry block, sheet rock, gypsum fiber roof board, or any other product containing quartz.

2.1.3 Walk-behind saws used to cut concrete or asphalt.

2.1.4 Rig-mounted or free standing core saws or drills (including impact and rotary hammer drills) used to penetrate concrete, concrete masonry block, sheet rock, gypsum fiber roof board, or any other structural component or product containing quartz.

2.1.5 Jackhammers and handheld powered chipping tools used to demolish or modify concrete, concrete masonry block, or any other structural component or product containing quartz.

2.1.6 Vehicle mounted hammers or chipping tools used to demolish concrete, concrete masonry block, or any other structural component or product containing quartz.

2.1.7 Handheld grinders or cut-off wheels used for mortar removal or cutting/grinding of concrete, concrete masonry block, sheet rock, gypsum

fiber roof board, or any other structural component or product containing quartz.

2.1.8 Walk-behind milling machines or bead blasters used for surfacing activities on concrete, concrete masonry block, asphalt, or any other product containing quartz.

2.1.9 Installation or demolition of sheet rock, including mudding, taping, texturizing activities with quartz containing materials.

2.1.10 Hand or power tool sanding of painted surfaces. Current latex paint products contain quartz and the painted substrate (sheet rock, concrete masonry block, concrete) contains quartz.

2.1.11 Drivable asphalt milling machines used to mill asphalt roadways or walkways.

2.1.12 Ball mills or crushing equipment used to size products containing quartz.

2.1.13 All housekeeping operations associated with the activities described above.

2.2 Schlosser & Associates Mechanical Contractors, Inc. employees who work in proximity to silica-related operations must be aware of safe work practices and take all necessary precautions associated with avoiding and minimizing airborne silica exposure. Employees shall be trained, and follow the control methods in Table 1.

### 3. Engineering Controls and Work Practice Control Methods

3.1 Table 1: Specified Exposure Control Methods When Working With Material 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)	<p>For tasks performed outdoors only:</p> <p>Use saw equipped with commercially available dust collection system.</p> <p>Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p> <p>Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency.</p>	None	None
(iv) Walk-behind saws	<p>Use saw equipped with integrated water delivery system that continuously feeds water to the blade.</p> <p>Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p> <p>–When used outdoors.</p> <p>–When used indoors or in an enclosed area.</p>	None APF 10	None APF 10
(v) Drivable saws	<p>For tasks performed outdoors only:</p> <p>Use saw equipped with integrated water delivery system that continuously feeds water to the blade.</p> <p>Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p>		
(vi) Rig-mounted core saws or drills	<p>Use tool equipped with integrated water delivery system that supplies water to cutting surface.</p> <p>Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p>	None	None
(vii) Handheld and stand-mounted drills (including impact and rotary hammer drills)	<p>Use drill equipped with commercially available shroud or cowl with dust collection system.</p> <p>Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p> <p>Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism.</p> <p>Use a HEPA-filtered vacuum when cleaning holes.</p>	None	None
(viii) Dowel drilling rigs for concrete	<p>For tasks performed outdoors only:</p> <p>Use shroud around drill bit with a dust collection system. Dust collector must have a filter with 99% or greater efficiency and a filter-cleaning mechanism.</p> <p>Use a HEPA-filtered vacuum when cleaning holes.</p>	APF 10	APF 10

<p>(ix) Vehicle-mounted drilling rigs for rock and concrete</p>	<p>Use dust collection system with close capture hood or shroud around drill bit with a low-flow water spray to wet the dust at the discharge point from the dust collector.</p> <p><b>OR</b></p> <p>Operate from within an enclosed cab and use water for dust suppression on drill bit.</p>	<p>None</p> <p>None</p>	<p>None</p> <p>None</p>
<p>(x) Jackhammers and handheld powered chipping tools</p> <p>(x) Jackhammers and handheld powered chipping tools <b>(Continued)</b></p>	<p>Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact.</p> <p>–When used outdoors. –When used indoors or in an enclosed area.</p> <p><b>OR</b></p> <p>Use tool equipped with commercially available shroud and dust collection system.</p> <p>Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p> <p>Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism.</p> <p>–When used outdoors. –When used indoors or in an enclosed area.</p>	<p>None APF 10</p> <p>None APF 10</p>	<p>APF 10 APF 10</p> <p>APF 10 APF 10</p>
<p>(xi) Handheld grinders for mortar removal (i.e., tuckpointing)</p>	<p>Use grinder equipped with commercially available shroud and dust collection system.</p> <p>Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p> <p>Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.</p>	<p>APF 10</p>	<p>APF 25</p>
<p>(xii) Handheld grinders for uses other than mortar removal</p>	<p>For tasks performed outdoors only: Use grinder equipped with integrated water delivery system that continuously feeds water to the grinding surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p> <p><b>OR</b></p> <p>Use grinder equipped with commercially available shroud and dust collection system.</p> <p>Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p> <p>Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning</p>		

	<p>mechanism.</p> <ul style="list-style-type: none"> <li>- When used outdoors.</li> <li>- When used indoors or in an enclosed area.</li> </ul>	<p>None</p> <p>None</p>	<p>None</p> <p>APF 10</p>
(xiii) Walk-behind milling machines and floor grinders	<p>Use machine equipped with integrated water delivery system that continuously feeds water to the cutting surface.</p> <p>Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p> <p style="text-align: center;"><b>OR</b></p> <p>Use machine equipped with dust collection system recommended by the manufacturer.</p> <p>Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p>	<p>None</p> <p>None</p>	<p>None</p> <p>None</p>
(xiii) Walk-behind milling machines and floor grinders <b>(Continued)</b>	<p>Dust collector must provide the air flow recommended by the manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism.</p> <p>When used indoors or in an enclosed area, use a HEPA-filtered vacuum to remove loose dust in between passes.</p>		
(xiv) Small drivable milling machines (less than half-lane)	<p>Use a machine equipped with supplemental water sprays designed to suppress dust. Water must be combined with a surfactant. Operate and maintain machine to minimize dust emissions.</p>	<p>None</p>	<p>None</p>
(xv) Large drivable milling machines (half-lane and larger)	<p>For cuts of any depth on asphalt only: Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust.</p> <p>Operate and maintain machine to minimize dust emissions.</p> <p>For cuts of four inches in depth or less on any substrate: Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust.</p> <p>Operate and maintain machine to minimize dust emissions.</p> <p style="text-align: center;"><b>OR</b></p> <p>Use a machine equipped with supplemental water spray designed to suppress dust. Water must be combined with a surfactant. Operate and maintain machine to minimize dust emissions</p>	<p>None</p> <p>None</p> <p>None</p>	<p>None</p> <p>None</p> <p>None</p>
(xvi) Crushing machines	<p>Use equipment designed to deliver water spray or mist for dust suppression at crusher and other points where dust is generated (e.g., hoppers, conveyers, sieves/sizing or vibrating</p>	<p>None</p>	<p>None</p>

	<p>components, and discharge points).</p> <p>Operate and maintain machine in accordance with manufacturer’s instructions to minimize dust emissions.</p> <p>Use a ventilated booth that provides fresh, climate-controlled air to the operator, or a remote control station.</p>		
(xvii) Heavy equipment and utility vehicles used to abrade or fracture silica-containing materials (e.g., hoe-ramming, rock ripping) or used during demolition activities involving silica-containing materials	<p>Operate equipment from within an enclosed cab.</p> <p>When employees outside of the cab are engaged in the task, apply water and/or dust suppressants as necessary to minimize dust emissions.</p>	<p>None</p> <p>None</p>	<p>None</p> <p>None</p>
(xviii) Heavy equipment and utility vehicles for tasks such as grading and excavating but not including: demolishing, abrading, or fracturing silica-containing materials	<p>Apply water and/or dust suppressants as necessary to minimize dust emissions.</p> <p><b>OR</b></p> <p>When the equipment operator is the only employee engaged in the task, operate equipment from within an enclosed cab.</p>	<p>None</p> <p>None</p>	<p>None</p> <p>None</p>

### 3.2 Other Control Methods

3.2.1 Engineering and work practice controls, including administrative controls, shall be implemented to reduce and maintain employee exposure to silica at or below the PEL, to the extent that such controls are feasible.

3.2.2 Where all feasible engineering and work practice controls that can be instituted are not sufficient to reduce employee exposure to or below the PEL, such controls shall be used, nonetheless, to reduce employee exposure to the lowest feasible level (and in conjunction with respiratory protection).

3.2.3 Respiratory protection shall be selected based on guidance in 1926.1153 Table 1 or based on a competent person’s assessment of the potential airborne exposure that may be created by the means and methods of work (high energy operations with high airborne dust generation or low energy operations with low dust generation).

3.2.4 When using mechanical ventilation to control exposure, regularly evaluate the system's ability to effectively control exposure.

3.2.5 If administrative controls are used to limit exposure, establish and implement a job rotation schedule that includes employee identification as well as the duration and exposure levels at each job or work station where each affected employee is located.

3.2.6 A written compliance program shall be established and implemented prior to the start of operations outside the scope of this policy. The written program shall outline the plans for maintaining employee exposure below the PEL.

3.2.7 Maintain all surfaces as free as possible from accumulations of silica. Select methods for cleaning surfaces and floors that minimize the likelihood of silica becoming airborne (such as using a HEPA vacuum).

3.2.8 If vacuuming is the method selected, specialized vacuums with HEPA filtration are required. Methods to use and empty vacuums in a manner that minimizes the reentry of silica into the workplace shall be described and used. Use of household vacuums with HEPA filters are not allowed at any time for the collection of dust or debris that contains silica.

3.2.9 Never use compressed air to remove silica from any surface unless it is used in conjunction with a ventilation system designed to capture the airborne dust created while using the compressed air.

3.2.10 Employees shall not eat, drink, smoke, chew tobacco or gum, or apply cosmetics in any areas where exposure to silica is above the PEL (in other words, regulated areas).

3.2.11 Do not allow employees to leave the workplace wearing any protective clothing or equipment that is required to be worn during their work shift without HEPA vacuum removal of dust.

3.2.12 Where feasible, install shower facilities and require employees who work in regulated areas to shower at the end of their work shift. Also provide an adequate supply of cleaning agents and clean towels.

3.2.13 Provide hand washing facilities for use by employees working in regulated areas. Furthermore, require employees to wash their hands and face at the end of the work shift and prior to eating or entering eating facilities, drinking, smoking, or applying cosmetics.



3.2.14 Eating facilities or areas shall be provided for employees working in regulated areas. These facilities shall be maintained free of silica contamination and shall be readily accessible to those employees.

### 3.3 Personal Protective Equipment (PPE)

3.3.1 Respiratory protection must be used for the following conditions:

3.3.1.1 During periods when employee exposure to airborne silica exceeds the PEL.

3.3.1.2 For work operations where engineering and work-practice controls are not sufficient to reduce employee exposure to or below the PEL.

3.3.1.3 During periods when an employee requests a respirator.

3.3.1.4 During periods when respirators are required to provide interim protection while conducting initial exposure assessments.

3.3.1.5 Powered air-purifying respirators (PAPR) shall be provided to employees who request such a respirator to use where it will provide adequate protection.

3.3.1.6 Employees shall be provided, at no cost, protective work clothing and equipment including cotton coveralls or similar full-body clothing, gloves, hats, shoes or disposable shoe coverlets, face shields, vented goggles, or other appropriate PPE.

## 4. Training Requirements.

4.1 Schlosser & Associates Mechanical Contractors, Inc. employees who anticipate working on projects where they could be exposed to airborne silica will be provided training in silica hazards in accordance the Schlosser & Associates Mechanical Contractors, Inc. policy established to comply with the hazard communication standard (29 CFR 1910.1200).

4.1.1 Each employee will have access to labels on containers of crystalline silica and safety data sheets, and be provided information on the health hazards of silica including cancer, lung effects, immune system effects, and kidney effects.

4.1.2 Schlosser & Associates Mechanical Contractors, Inc. employees will be provided training and information regarding specific activities identified in this policy that could result in airborne silica exposure, and the specific engineering controls, work practices and respiratory protection requirements to mitigate the potential airborne silica exposures.

4.1.3 This training will provide a discussion of silica hazards, initial exposure determination either by complying with 29 CFR 1926.1153 Table 1 requirements or air monitoring, specific engineering and work practice control measures, personal protective equipment (PPE), and medical surveillance requirements.

4.1.4 The training will also identify the Schlosser & Associates Mechanical Contractors, Inc. competent person for silica exposure identification and determination of control requirements, where necessary.

4.1.5 All Schlosser & Associates Mechanical Contractors, Inc. employees will be provided with access to a copy of 29 CFR 1910.1153 and be trained on the contents of 29 CFR 1926.1153.

4.2 Each employee shall be provided training and demonstrate knowledge and understanding of the following:

4.2.1 Health hazards associated with exposure to respirable crystalline silica.

4.2.2 Specific tasks that could result in exposure to respirable crystalline silica.

4.2.3 Specific measures that are required to protect employees from exposure to respirable crystalline silica, including engineering controls, work practices, and required use of respiratory protection.

4.2.4 The contents of the 29 CFR 1926.1153.

4.2.5 The identity of the competent person, where applicable.

4.2.6 Purpose and description of the medical surveillance policy, where applicable.

4.3 The written compliance policy shall be made available to all affected employees.

4.4 In addition, notification to owners, contractors, and other personnel working in the area shall be made.