



Changes to the Cal/OSHA Respirable Crystalline Silica Standard

Key dates

The Respirable Crystalline Silica Standard took effect October 17, 2016. Compliance starts:

- Construction – June 23, 2017
- General industry and maritime – June 23, 2018 (two years after the effective date)
- Hydraulic fracturing – June 23, 2018 (for all provisions except engineering controls, which have a compliance date of June 23, 2021 and medical surveillance obligations commencing on June 23, 2020 for employees who will be occupationally exposed to respirable crystalline silica at or above the action level for 30 or more days per year.)

States with their own OSHA-approved state plans have six months to adopt standards that are as effective as the OSHA standards. Be sure to check the information on your state adopted silica standards to ensure compliance with your state OSHA plan.

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Who is Affected?

Employers and employees of general industry, maritime, construction and hydraulic fracturing industries. Construction work performed on concrete or rock that creates dust from drilling, cutting and grinding materials or other operations that contain silica.

What you need to know

- Permissible exposure limit (PEL) is now 50 $\mu\text{g}/\text{m}^3$ of respirable crystalline silica over an 8-hour time-weighted average (TWA).
- An “action level” of 25 $\mu\text{g}/\text{m}^3$ has been added. The action level is when an employer has to take action to control the exposure.
- Respirable crystalline silica must be addressed in the employer’s hazard communication program.
- Develop a written exposure control plan in accordance with T8 CCR 5204(f) (2) and T8 CCR 1532.3(g) when the employee exposure level is above 25 $\mu\text{g}/\text{m}^3$ (TWA).
- Cal/OSHA standard T8 CCR 1532.3 includes a task-orientated exposure limit table. The table states the equipment, task, engineering control methods and time exposed during the activity into a table, referred to as Table 1. It uses an example task, exposure control method and length of shift to identify what required respiratory protection is necessary for that activity.
- Use engineering controls (such as water or ventilation) to limit worker exposure to the PEL.
- Provide respirators when engineering controls cannot adequately limit exposure.
- Limit worker access to high exposure areas.
- Offer medical exams to highly exposed workers and give them information about their lung health.
- Train workers on silica risks and how to limit exposures.
- Maintain all data from exposure monitoring and assessment of employee exposure to respirable crystalline silica.
- Conduct an assessment of employee exposure using either a performance option or a scheduled monitoring option. (Note: In construction, employers that fully and properly implement the engineering controls, work practices and respiratory protection as specified on Table 1 do not have to assess the exposure of employees engaged in the task.)

Why the Changes?

The previous standard was outdated and did not adequately protect workers from silica-related diseases. New ways of manufacturing products containing silica have also created the demand for updated standards to be enhanced. The change also provides flexibility to help employers, especially small businesses, protect workers from silica exposure.

Written Exposure Control Plan

- A designated competent person is defined as having the knowledge and ability necessary to implement the written exposure control plan required under the standard.
- The employer is to develop and implement a written exposure control plan for work involving exposure to respirable crystalline silica.
- The employer has to develop and implement engineering controls to reduce employee exposure to (or below) the permissible exposure limits. The employer should also limit employee access to areas where exposures are above the permissible exposure limits.
- Exposure plans must be reviewed at least annually for effectiveness and update if necessary.
- Plans must be available for examination and copying upon request from affected employees, their designated representative or Cal/OSHA officials.

Housekeeping Practices

Avoiding certain housekeeping activities will limit workers' exposure to respirable crystalline silica.

- Do not brush or dry sweep, unless wet sweeping and HEPA-filtered vacuuming is not feasible.
- Do not clean clothing or surfaces with compressed air.
- Housekeeping is updated to incorporate the use of HEPA vacuuming, wetting dust and wet sweeping.

Medical Exams

Employers should make medical surveillance available, at no cost to the employee, for each employee who's required to use a respirator for 30 days or more per year.

- The purpose of the medical surveillance is to identify any crystalline silica-related diseases and determine employee's existing lung condition that may make him/her more sensitive to such a disease.
- Exams have to be performed by a physician or other licensed health care professional (PLHCP).
- Initial exams have to be done within 30 days of the employee's assignment, unless the employee has had a medical exam compliant with T8 CCR 5204 and 1532.3 within the last three years.

Training for Workers

Employers must ensure employees receive training under the silica standard and can demonstrate knowledge and understanding of their hazards, including:

- Health hazards associated with respirable crystalline silica exposure.
- Specific tasks that could expose a worker to respirable crystalline silica.
- Specific measures the employer is implementing to protect workers from exposure.
- The employer shall make available medical examinations at least every three years or more frequently if recommended by the PLHCP.

Training must take place at the time a worker is assigned to a job involving exposure to respirable crystalline silica.

Record Keeping

Record keeping for employers with applicable operations must retain the following records:

- Air monitoring data
- Objective data
- Medical surveillance records



Personal Protective Equipment

- Respiratory protection is to be provided when controls will not limit exposures below the permissible exposure limit.
- Employers will want to review the Table 1 exposure limits to identify the need for respiratory protection.
- If an employer performs work needing the use of respiratory protection, a written respiratory protection program is required anytime respirators are required in the workplace in accordance with T8 CCR 5144.

Want to know more?

Employers should become familiar with the updated standard, Table 1 guidelines and how it applies to their industry.

Table 1 Guidelines:

https://www.dir.ca.gov/title8/1532_3.html

Cal/OSHA Silica Standards:

<http://www.dir.ca.gov/dosh/respiratory-silica-FAQ.html>

OSHA Small Entity Compliance Guide, Document 3902:

<http://www.osha.gov/Publications/OSHA3902.pdf>

Cal/OSHA Hazards of Silica in Construction etool:

<http://www.dir.ca.gov/dosh/etools/08-019/index.htm>