REVIEW OF SUBCONTRACTOR COMPLIANCE WITH 1926.1153 RESPIRABLE CRYSTALLINE SILICA

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SLAC reviews safety plans, etc. of its subcontractors as per requirements of 10CFR851.

1926.1153.1153(g) Written Exposure Control Plan requires employers to establish and implement a written exposure plan that contains certain elements unless employee exposure will remain below 25 micrograms per cubic meter of air (25 $\mu g/m^3$) as an 8-hour time-weighted average (TWA) under any foreseeable conditions.
1. How do other labs perform the review of their subcontractors’ silica safety plans?

A. Review the silica control aspects of the JSA for the specific silica-related tasks to be performed onsite at the DOE lab?

B. Review the entire written exposure plan?
   - Including Medical, Hazcom training, etc.
   - Separate submittal prior to award job or JSA review later?
Questions for Benchmarking (Ctd)

- Does your lab require annual aerosol challenging of silica-related HEPA vacuum cleaners’ filter efficiency?
- Laboratory owned treated the same as those owned by subcontractors?
Thanks for your feedback

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