AGENDA

Discussion Topics

- What exposure limit (PEL or AL) are the Table 1 controls intended to be protective to, and what does this mean for comparisons to the 2005 and 2017 ACGIH TLVs?
- Obtaining and using objective data for compliance.
- Using exposure assessments and/or 1926.1153 Table 1 Controls.
- Ability to match actual equipment to Table 1 Controls.
- Working with contractors—soliciting, overseeing, and monitoring use of control methods in lieu of exposure assessment. How this may affect small and large contractor differently.
- Written template for an Exposure Control Plan.
- Awareness training for silica workers.
WHAT LEVEL OF EXPOSURE PROTECTION?

Construction Standard - Table 1

- Table 1 with controls is protective to below the PEL, but

- Not necessarily to below the AL or 2017 TLV?

OSHA has determined these control technologies are technologically feasible and will, with few exceptions, achieve exposures of 50 µg/m³ or less most of the time. Furthermore, Table 1... acts as a “safe harbor” in the sense that full and proper implementation of the specified controls satisfies the employer’s duty to achieve the PEL, and the employer is under no further obligation to do an exposure assessment or install additional, non-specified controls.
WHAT LEVEL OF EXPOSURE PROTECTION?

Construction Standard - Table 1

- OSHA has also determined that application groups in construction that use large quantities of silica containing material or involve high energy operations will not be able to consistently achieve 25 µg/m³ (e.g. tuckpointing/grinding and rock and concrete drilling).

- Evidence in the record indicates that, for most of the other construction operations examined, use of feasible engineering and work practice controls will still result in frequent exposures above 25 µg/m³.

- For other tasks in construction application groups, OSHA has insufficient data to demonstrate that engineering and work practice controls will reduce exposures to or below 25 µg/m³ most of the time.
WHAT LEVEL OF EXPOSURE PROTECTION?

Construction Standard- Table 1

- OSHA indicates that task exposures in Table 1, with the controls specified, can be above the AL, but below the PEL.

..exposure data demonstrates that the engineering controls and work practices specified on Table 1 for stationary masonry saws (wet cutting) significantly reduce employees’ exposures to respirable crystalline silica from a mean of 329 µg/m\(^3\), when cutting masonry dry, to a mean of 41 µg/m\(^3\).

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OSHA indicates there is still a significant health risk at exposures at the AL (equal to the 2017 TLV)

Even though OSHA’s risk assessment indicates that a significant risk also exists at the revised action level of 25 µg/m³, the Agency is not adopting a PEL below the revised 50 µg/m³ limit because OSHA must also consider the technological and economic feasibility of the standard in determining exposure limits.

OSHA finds that the [health] risk is substantially decreased, though still significant, at the new PEL of 50 µg/m³ and below, including at the new action level of 25 µg/m³.
IS TABLE 1 PROTECTIVE ENOUGH?

Table 1 and the 2005 & 2017 TLVs

- What if:
  - You follow Table 1 with the premise that Table 1 protects to < PEL, but could still be above the AL
    
    Note: Even if above the AL in Table 1, you are relieved of conducting air monitoring that would normally be required under 1925.1153 (d) Alternative Exposure Control Methods.

- Do you require (of your facility and contractors):
  - Air monitoring (not required by OSHA, but is it necessary for 851 TLV compliance?)
  - Respiratory protection (not required by OSHA)
  - Additional exposure controls not specified by Table 1.
IS TABLE PROTECTIVE ENOUGH?

Table 1 and the 2005 & 2017 TLVs

- If you use Table 1 – can you claim its protection to below the 2005 TLV?

- If you adopt the 2017 TLV
  - Would you still be expected to collect air samples since it is essentially the AL and OSHA says sampling is not required?

- If you collect a sample while working in Table 1 and are over the PEL or 2017 TLV
  - ORPS Reportable?