



2017 SAFETY AND HEALTH BULLETIN

TO: All SMACNA Members **SB: 17-06**

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Director of Market Sectors and Safety

DATE: September 25, 2017

SUBJECT: **OSHA silica in construction rule - Dust collection tools are not the only compliance options**

The [Occupational Safety and Health Administration](#) postponed enforcement of the Silica in Construction standard from June 23, 2017 to September 23, 2017, with a 30-day “grace period” for companies to make initial compliance efforts such as assessing work processes and tasks, and preparing written programs as needed. SMACNA sent out compliance information in the past year leading up to the date and this bulletin provides further guidance.

There have been numerous questions to OSHA regarding compliance options, specifically the use of “Table One”. Table One is a list of 18 common tasks that, when conducted under certain conditions with specific tools and equipment, can be “exempt” from most provisions of the standard. Some tool manufacturers are promoting their dust collection tools and accessories used with Table One requirements as a sole means of compliance. You should be aware that Table One and dust collection tools are not the only options for compliance.

While dust collection tools can be an effective method to reduce exposures, SMACNA members affected by this rule are encouraged to take a “holistic” approach to silica compliance by assessing the tasks and processes where silica is disturbed (cut, drilled, grinded, etc.). Jobsite tasks, such as drilling holes for duct hangers, done over a short duration with preventative work practices could be excluded from requirements of the standard according to the OSHA [Small Entity Compliance Guide for the Respirable Crystalline Silica Standard for Construction](#). Wet methods keep dust below permissible levels for many tasks SMACNA members conduct. Although Table One can be used in specific instances, it has limitations. Companies should evaluate all options including the use of good work practices, Table One and dust collection tools, wet methods, and other alternatives to implement an exposure prevention strategy that works for each task.

SMACNA has developed a [model written program](#) to assist SMACNA contractors in developing a written Silica Program. [SilicaSafe](#) is an excellent resource to prepare a daily / weekly written silica plan. SMACNA members needing further information can contact Mike McCullion, SMACNA director of market sectors and safety at 703-995-4027 or mmccullion@smacna.org.