

# Industrial Hygiene Services — Compliance to the New OSHA Respirable Silica Standard

## Introduction

The Occupational Safety and Health Administration (OSHA) has issued its final rule on respirable crystalline silica for general industry and construction to go in effect on June 23, 2016. The new standard lowers the Permissible Exposure Limit (PEL) for respirable silica to 0.05 mg/m<sup>3</sup> with an action level (AL) of 0.025 mg/m<sup>3</sup>. Exposures above the AL trigger certain compliance items such as baseline exposure monitoring, personal protective equipment, regulated work areas, and/or medical surveillance. When the PEL is exceeded, compliance with all sections of the OSHA standard is mandatory. Long-term exposure to elevated concentrations of free silica can lead to the progressive lung disease silicosis.

Employers in general industry and maritime have until June 23rd, 2018 to comply with the updated regulations. Employers in the construction industry have until June 23rd, 2017 to comply with the updated regulations:

## Effective Date: June 23, 2016 (Construction and General Industry)

Industry	Compliance Date
Construction	June 23, 2017
General Industry and Maritime	June 23, 2017
Hydraulic Fracturing	June 23, 2018 (PEL)
	June 23, 2021 (Engineer)

A written exposure control plan is required under the new standard. The plan must describe tasks involving exposure to respirable crystalline silica, engineering controls, work practices, and respiratory protection for each task, and finally housekeeping methods used to limit exposure. The construction industry has two (2) methods for compliance to the standard; Implementing specified exposure control methods or using alternative exposure control methods.

1. Specified exposure control methods: Table 1 in the construction standard outlines eighteen (18) common construction tasks with engineered exposure control methods and in some cases respirator requirements. If employers fully and properly implement the controls outlined in Table 1, they are exempt from certain requirements, such as compliance to the permissible exposure limit (PEL) and employee exposure monitoring for those engaged in select tasks. Medical surveillance will be required for employers who use respirators more than thirty (30) days a year.

2. Alternative exposure control methods: If an employer fails to comply with the specified exposure control methods in Table 1, exposures above the AL trigger certain compliance items such as baseline exposure monitoring, personal protective equipment, and/or medical surveillance. When the PEL is exceeded, compliance with all sections of the OSHA standard is mandatory.



Aires Consulting, a division of Gallagher Bassett Services Inc., is a full service Environmental, Occupational Health and Safety provider that can help you determine if you will be in compliance with the new regulations. Aires' industrial hygiene department can assist with compliance to the new silica standard for general industry and construction activities. Our national associate network can:

- Perform personal and area air exposure monitoring
- Determine regulated areas
- Develop a written exposure control plan
- Determine appropriate controls and personal protective equipment requirements
- Develop employee training programs

We recommend that all employees take a proactive approach to comply with the new requirements prior to the compliance dates. Contact us today to obtain a full list of our services and how we can assist with compliance to the new standard.



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