

## IMPORTANT OSHA COMPLIANCE DATES FOR 2017

Two OSHA Standards have compliance dates in 2017 that affect the Construction Industry. These standards are OSHA's Crystalline Silica Rule for Construction and the Recordkeeping Standard.

### *Crystalline Silica Standard for Construction*

OSHA has set an implementation date of **June 23, 2017** for the Construction Silica Standard.

The standard requires employers to limit worker exposures to respirable crystalline silica and to take other steps to protect workers. The standard provides flexible alternatives, especially useful for small employers. Employers can either use a control method laid out in Table 1 of the construction standard, which matches common construction tasks with dust control methods, so employers know exactly what they need to do to limit worker exposures to silica, **or** they can measure workers' exposure to silica and independently decide which dust controls work best to limit exposures to the PEL in their workplaces.

Regardless of which exposure control method is used, all construction employers covered by the standard are required to:

- Establish and implement a **written exposure control plan** that identifies tasks that involve exposure and methods used to protect workers, including procedures to restrict access to work areas where high exposures may occur.
- Designate a **competent person** to implement the written exposure control plan.
- Restrict **housekeeping practices** that expose workers to silica where feasible alternatives are available.
- Offer **medical exams** -including chest X-rays and lung function tests -every three years for workers who are required by the standard to wear a respirator for 30 or more days per year.
- **Train workers** on work operations that result in silica exposure and ways to limit exposure.
- **Keep records** of workers' silica exposure and medical exams.

Additional information on OSHA's silica rule can be found at [www.osha.gov/silica](http://www.osha.gov/silica)

### *Recordkeeping Standard Changes*

Under the final rule that became effective January 1, 2017, OSHA will revise its requirements for recording and submitting records of workplace injuries and illnesses to require that some of this recorded information be submitted to OSHA electronically for posting to the OSHA website.

*Compliance Schedule* - The new reporting requirements will be phased in over two years:

**Establishments with 250 or more employees** in industries covered by the recordkeeping regulation, must submit information from their 2016 Form 300A by **July 1, 2017**. These same employers will be required to submit information from all 2017 forms (300A, 300, and 301) by July 1, 2018. Beginning in 2019 and every year thereafter, the information must be submitted by March 2.

**Establishments with 20-249 employees** in [certain high-risk industries](#) (including Construction) must submit information from their 2016 Form 300A by **July 1, 2017**, and their 2017 Form 300A by July 1, 2018. Beginning in 2019 and every year thereafter, the information must be submitted by March 2. The entire list of establishments with 20-249 employees who must submit injury and illness data electronically can be found at: <https://www.osha.gov/recordkeeping/NAICScodesforelectronicsubmission.pdf>

*How will electronic submission work?* OSHA will provide a secure website that offers three options for data submission. First, users will be able to manually enter data into a web form. Second, users will be able to upload a CSV file to process single or multiple establishments at the same time. Last, users of automated recordkeeping systems will have the ability to transmit data electronically via an API (application programming interface). The site is scheduled to go live in February 2017.



## SILICA EXPOSURE PREVENTION

### Overview:

Exposure to crystalline silica often occurs as part of common workplace operations involving cutting, sawing, drilling, grinding/sanding and crushing of natural and engineered stone products such as granite and slate and also in the quarrying of these materials. Over-exposure can lead to serious, sometimes fatal illnesses including silicosis, lung cancer, tuberculosis (in those with silicosis) and chronic obstructive pulmonary disease (COPD). The best method to prevent a crystalline silica exposure related disease is to minimize exposure to crystalline silica.

### What is Silicosis?

Silicosis is a serious lung disease caused by over-exposure to minute, typically invisible crystalline silica particles. Over-exposure may be in the form of short duration – high concentration exposures or long-term lower concentration exposures. These minute, typically invisible particles cause permanent scarring in the lung tissues which progresses over time.

There are three (3) types of silicosis:

1. Chronic: usually develops after ten (10) or more years of low level exposures
2. Accelerated: typically develops five (5) to ten (10) years after high level exposures
3. Acute: typically develops within a few months to five (5) years after high level exposures

The symptoms of silicosis may include intense cough, shortness of breath, or weakness. Other possible symptoms are chest pain, fever, night sweats, weight loss, and respiratory fever.

### Crystalline Silica Exposure Control Measures:

- Use of wet machining, grinding/sanding, cutting and drilling processes which use water to suppress and collect particles. OSHA has outlined these in Table 1 of the Construction Crystalline Silica Standard, 29 CFR 1926.1153 Table 1.
- Use dust collection systems when wet operations are not available.
- When work practices or available systems do not achieve exposures below the permissible exposure limit, wear the appropriate personal protection equipment (PPE) provided and recommended by the employer. This may include but is not limited to: a uniform or protective clothing, safety eye ware and respiratory protection.
- Use of HEPA filter vacuums, or wet cleanup methods in-place of dry sweeping.
- Never use compressed air or other practices which cause particles to become airborne for cleanup, including cleaning your body.
- Always ensure both dry and wet particle collection equipment and systems, for example hoods, shrouds, dust collectors and machine water supply and treatment systems are maintained and in good working order. Immediately report equipment deficiencies to your supervisor.
- To minimize the transfer of crystalline silica outside the workplace, follow the employer's personal hygiene procedures for washing and handling of clothing that may contain crystalline silica.
- Follow the employer's personal hygiene procedures for cleanup prior to eating, drinking or smoking.
- No eating, drinking or smoking within areas where crystalline silica may be present.

