Table 1 – Equipment Names and Best Practice Tips – Update September 2018

- Includes equipment terms commonly used by different trades and in different geographic areas.
- 'Best practice' tips are intended to help employers and their employees operate the equipment-control options effectively and are based on 1) <u>OSHA's</u> <u>Small Entity Compliance Guide for the Respirable Crystalline Silica Standard for Construction</u>; 2) <u>OSHA's Frequently Asked Questions ("FAQs") for the</u> <u>Construction Industry</u>; 3) silica standard's Table 1; 4) manufacturer specifications; and 5) craft worker/contractor input based on experience in the field.

| Equipment/ | Photos & Video | Engineering, Work Practice Control | Best Practice Tips |
|---|--------------------------------------|--|---|
| Control | | Methods & Required Respiratory | |
| | | Protection | |
| (vii) Handheld and stand- mounted drills (including impact and rotary hammer drills) Other names: Hammer drill Rotohammer Roto-hammer | <image/> <caption><image/></caption> | CONTROL: ventilation (local exhaust ventilation or LEV) Use tool equipped with commercially available shroud or cowling with dust collection system. Operate and maintain tool in accordance to manufacturer's instructions to minimize dust emissions. Required Respiratory Protection: ≤4 hours/shift: NONE >4 hours/shift: NONE | OSHA¹ requires the employer to ensure that: The shroud or cowling is intact and installed in accordance with the manufacturer's instructions The hose connecting the tool to the vacuum is intact and without kinks or tight bends The filter(s) on the vacuum are cleaned or changed in accordance with the manufacturer's instructions The dust collection bags are emptied to avoid overfilling The air flow rate is equal to or greater than recommended by the manufacturer A HEPA-filtered vacuum is used when cleaning holes. Compressed air can be used in conjunction with a HEPA-filtered vacuum or hole cleaning kit designed for use with compressed air to clean holes Additional exhaust is provided as needed to minimize the accumulation of visible airborne dust when operating indoors or in an enclosed space (area where airborne dust can build up) Additional means of exhaust could include: portable fans (e.g. box fans, floor fans, axial fans, oscillating fans), portable ventilation systems, or other systems that increase air movement and assist in the removal and dispersion of airborne dust⁴ "Indoors or in enclosed areas" refer to any areas where, without the assistance of forced ventilation, the dispersal of airborne dust can be impeded and concentrations can build up. Parking garages, pits, trenches, empty swimming pools, open-top structures with 3 walls, or other structures with limited air movement could be considered enclosed⁴ |
| | | | Tips for this tool continued on next page. |



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| | Employers may roly on statements made by the |
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| ©SHA [®] | Employers may rely on statements made by the manufacturar of aquiament to determine dust collection |
| Controlling Respirable Crystalline Silica in Construction: | manufacturer of equipment to determine dust conection |
| Handheld and Stand-Mounted Drills | systems function at the air flow level required. However, |
| (Including Impact and Rotary Hammer Drills) | employers must properly select, use, maintain, and replace |
| | dust collection systems in order to ensure they function as |
| | designed ⁴ |
| | Other tips: |
| Video courtesy of OSHA | • Visually inspect the drill, hood (shroud or cowl) and the dust |
| (<u>https://www.youtube.com/watch?v=Y43</u> | collection system to ensure they are properly connected |
| <u>RGMR/1W4</u> English & Spanish Sublide | • Visually inspect the drill, hood (shroud or cowl) and the dust |
| | collection system for missing or damaged parts |
| | Check the drill, hood (shroud or cowl) and dust collection |
| | system regularly to ensure the system is operating so that no |
| | visible dust ² is emitted from the process once the drill has |
| | entered the substrate (material) |
| | Check and replace the filter and empty the duct collection |
| | Check and replace the filter and empty the dust conection unit, and use filters and collection have for collection silica |
| | unit, and use filters and collection bags for collecting silica |
| | dust |
| | If applicable, regularly check the automatic filter cleaning |
| | system to ensure it is operating properly to maintain |
| | maximum air flow and suction power and can be used in |
| | conjunction with the HEPA filter |

¹Best practice requirements from OSHA's Small Entity Compliance Guide for the Respirable Crystalline Silica Standard for Construction

²Although many of the entries on Table 1 require employers to "[o]perate and maintain" tools "in accordance with manufacturer's instructions to minimize dust emissions," 29 C.F.R. § 1926.1153(c)(1)(i)-(vii), (x)-(xiii), (xvi), or to "[o]perate and maintain machine[s] to minimize dust emissions," 29 C.F.R. § 1926.1153(c)(1)(xiv)-(xv), the standard does not separately require employers to minimize dust emissions. An employer generating a limited amount of dust when engaging in a task listed on Table 1 would not be in violation of the standard if it is fully and properly implementing the engineering controls, work practices, and respiratory protection specified on the Table (including operating and maintaining controls so as to minimize emissions). A small amount of dust can be expected even with new equipment that is operating as intended by the manufacturer. However, a noticeable increase in dust emissions may indicate that the dust control system is not operating properly. See OSHA's Q&A's #15 at https://www.osha.gov/dsg/topics/silicacrystalline/construction_info_silica.html.

³Respirator use is conditional on time spent using equipment (less than or equal to 4 hours/shift or greater than 4 hours/shift) and if task is done outdoors, indoors or in an enclosed area. See Table 1 in the standard for specific requirements including the assigned protection factor (respiratory protection). The employer does not have the track the exact amount of time that employees are performing a job throughout a shift to be in compliance with Table 1. Before the task is performed, the employer must make a good-faith judgement about whether the task will take more than 4 hours based on previous experience and other available information. At the beginning of the task, the employer must provide the employee the respiratory protection required for the anticipated time the employee will be engaged in the task. However, if unforeseen difficulties or other circumstances are expected to extend the task duration beyond 4 hours, the employer must provide the appropriate respiratory protection as soon as it becomes evident. (In that situation, the 4-hour mark is still measured from the beginning of the task, not from the time the expected duration of the task changes.) See OSHA's Q&A's #14 at https://www.osha.gov/dsg/topics/silicacrystalline/construction_info_silica.html.

⁴In August 2018, OSHA released new Q&A's. These additions are based on information included in the responses. Q&A #11 addresses manufacturer air flow recommendations; #12 addresses use of additional exhaust; #13 addresses indoor and enclosed spaces; #14 addresses respirator requirements based on duration of task; #15 addresses minimizing dust emissions; #17 addresses demolition hammers with bushing tools; #18 addresses tile saws. For more information, see https://www.osha.gov/dsg/topics/silicacrystalline/construction_info_silica.html.

⁵Employees engaged in the Table 1 task means the equipment operator; helpers, laborers and other employees who are assisting with the task; or any other employee responsible for completing the task. For example, an employee operating a walk-behind saw and another employee helping the operator guide the saw are both engaged in the task. An employee operating a jackhammer would be engaged in the task, but another employee directing traffic near the employee jackhammering would not be engaged in the task. <u>OSHA's Small Entity Compliance Guide for the Respirable</u> <u>Crystalline Silica Standard for Construction</u>, page 5.