

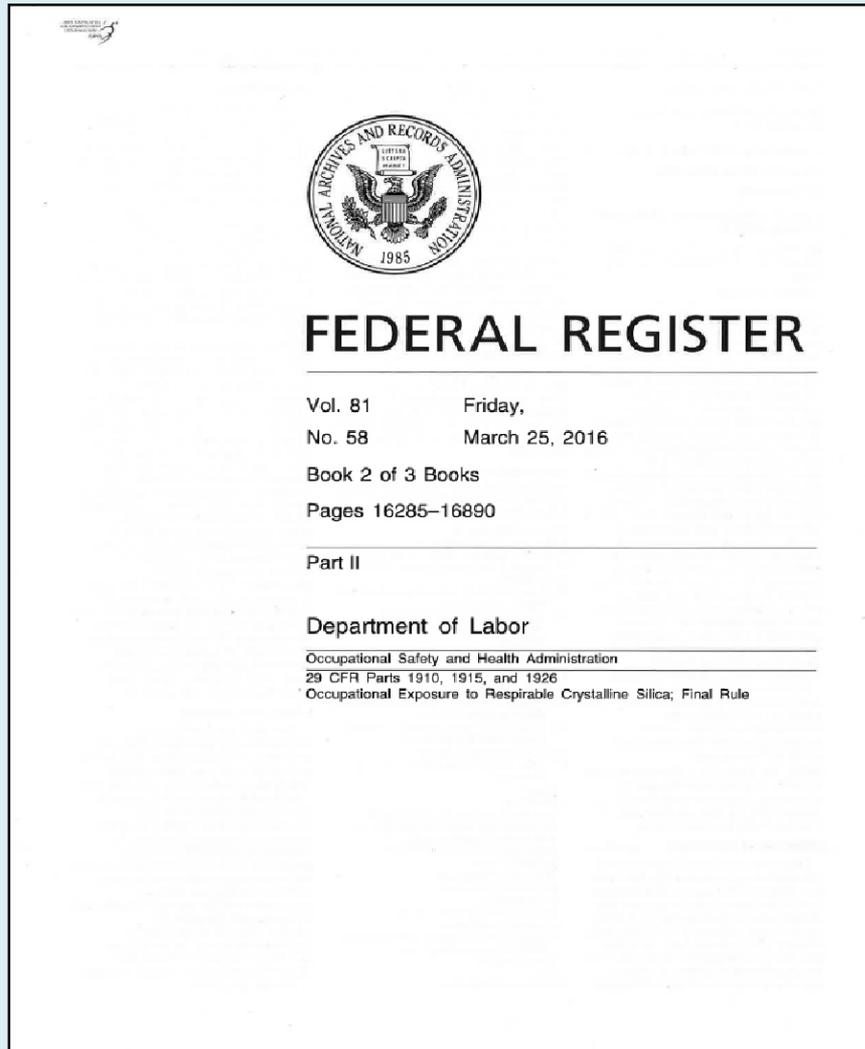
***Silica:  
Regulatory Update  
and  
Iowa OSHA Consultation  
Services***  
***02/07/2019***

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# Silica: Regulatory Update



# Final Rule Published on March 25, 2016



# What is Crystalline Silica?

- Common mineral found in:
  - Sand
  - Concrete
  - Stone
  - Mortar
- Found in many natural occurring materials used in industrial products and construction sites

# Industries & Operations with Exposures

- Construction
- Glass manufacturing
- Pottery products
- Structural clay products
- Concrete products
- Foundries
- Dental laboratories
- Paintings and coatings
- Jewelry production
- Refractory products
- Asphalt products
- Landscaping
- Ready-mix concrete
- Cut stone and stone products
- Abrasive blasting in:
  - Maritime work
  - Construction
  - General industry
- Refractory furnace installation and repair
- Railroads
- Hydraulic fracturing for gas and oil

# Should I lose my life, making a living?

Inhaling very small or “respirable” crystalline silica particulates has been linked to:

- Silicosis (incurable lung disease);
- Lung cancer;
- Chronic obstructive pulmonary disease; and
- Kidney disease



Healthy Lung



Silicotic Lung

# Who is at Risk from Exposure?

- Potentially YOU.
- Approximately 2.3 million workers on the job
- Hazard = specific activities create respirable silica dust
- Examples: High-energy operations
  - Cutting, crushing, sawing, grinding
  - Drilling and crushing stone, rock, brick, block/mortar
  - Using industrial sand
  - Abrasive blasting with sand
  - Sanding or drilling into concrete walls
  - Manufacturing brick, concrete blocks, or ceramic products
  - Foundries, and many others...

# Reasons for the Rule

- Current exposure limits are based on research from the 1960s or before
- Current PELs do not adequately protect worker health
- Silica exposure  $< 100 \mu\text{g}/\text{m}^3$  has been found to cause:
  - Lung cancer
  - Silicosis
  - Kidney disease
- Respirable crystalline silica = human carcinogen
- In 2014, deaths from silicosis  $>$  death by fire/caught by collapsing material, such as trench

# Health Benefits with New Rule

OSHA estimates that once the effects of the rule are fully realized, it will prevent:

- More than 600 deaths per year
  - Lung cancer: 124
  - Silicosis and other non-cancer lung diseases: 325
  - End-stage kidney disease: 193
- More than 900 new silicosis cases per year

# How will the New Rule Protect Me?

- Requires engineering controls
  - Ventilation or wet methods
- Reduce exposure to silica with restricted areas
- New permissible exposure limit (PEL) for all workplaces covered by the standard:
  - 50 micrograms of respirable crystalline silica per cubic meter of air ( $\mu\text{g}/\text{m}^3$ ) averaged over an 8-hr day
- Even lower action level:
  - 25 micrograms of respirable crystalline silica per cubic meter of air ( $\mu\text{g}/\text{m}^3$ ) averaged over an 8-hr day

# Construction Standard

- (a) Scope
- (b) Definitions
- (c) Specified exposure control methods
- OR**
- (d) Alternative exposure control methods
  - PEL
  - Exposure Assessment
  - Methods of Compliance
- (e) Respiratory protection
- (f) Housekeeping
- (g) Written exposure control plan
- (h) Medical surveillance
- (i) Communication of silica hazards
- (j) Recordkeeping

# Construction Scope

- All occupational exposures to respirable crystalline silica are covered, unless employee exposure will remain below  $25 \mu\text{g}/\text{m}^3$  as an 8-hr TWA under any foreseeable conditions.

# Definitions

- Permissible Exposure Limit (PEL) =  $50 \mu\text{g}/\text{m}^3$  as an 8-Hour TWA
- Action Level =  $25 \mu\text{g}/\text{m}^3$  as an 8-Hour TWA

# Specified Exposure Control Methods

- Table 1 in the construction standard matches 18 tasks with effective dust control methods and, in some cases, respirator requirements.
- Employers that fully and properly implement controls on Table 1 do not have to:
  - Comply with the PEL
  - Conduct exposure assessments for employees engaged in those tasks

# Example of Table 1 Entry

Equipment / Task	Engineering and Work Practice Control Methods	Required Respiratory Protection and Minimum APF	
		≤ 4 hr/shift	> 4 hr/shift
Handheld power saws (any blade diameter)	Use saw equipped with integrated water delivery system that continuously feeds water to the blade.		
	<p>Operate and maintain tool in accordance with manufacturers' instruction to minimize dust</p> <ul style="list-style-type: none"> <li>- When used outdoors</li> <li>- When used indoors or in an enclosed area</li> </ul>	<p>None</p> <p>APF 10</p>	<p>APF 10</p> <p>APF 10</p>

# Example of Table 1 Entry

Equipment / Task	Engineering and Work Practice Control Methods	Required Respiratory Protection and Minimum APF	
		≤ 4 hr/shift	> 4 hr/shift
Stationary masonry saws	<p>Use saw equipped with integrated water delivery system that continuously feeds water to the blade.</p> <p>Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</p>	None	None

# Example of Table 1 Entry

Equipment / Task	Engineering and Work Practice Control Methods	Required Respiratory Protection and Minimum APF	
		≤ 4 hr/shift	> 4 hr/shift
Vehicle-mounted drilling rigs for rock and concrete	Use dust collection system with close capture hood or shroud around drill bit with a low-flow water spray to wet the dust at the discharge point from the dust collector.	None	None
	<p>OR</p> <p>Operate from within an enclosed cab and use water for dust suppression on drill bit.</p>	None	None

# Examples of Air-purifying Respirators



**Half mask Filtering Facepiece  
Dust mask**  
APF=10  
*Needs to be fit tested*



**Half mask Elastomeric Respirator**  
APF=10  
*Needs to be fit tested*



**Full Facepiece Elastomeric Respirator**  
APF=50  
*Needs to be fit tested*

Original illustrations created by Attilis & Associates



**Tight-Fitting Full Facepiece  
Powered Air-Purifying Respirator  
(PAPR)**  
APF=1,000  
*Needs to be fit tested*



**Tight-Fitting Half Facepiece  
Powered Air-Purifying Respirator  
(PAPR)**  
APF=50  
*Needs to be fit tested*

# List of Table 1 Entries

- Stationary masonry saws
- Handheld power saws
- Handheld power saws for fiber cement board
- Walk-behind saws
- Drivable saws
- Rig-mounted core saws or drills
- Handheld and stand-mounted drills
- Dowel drilling rigs for concrete
- Vehicle-mounted drilling rigs for rock and concrete
- Jackhammers and handheld powered chipping tools
- Handheld grinders for mortar removal (tuckpointing)
- Handheld grinders for other than mortar removal
- Walk-behind milling machines and floor grinders
- Small drivable milling machines
- Large drivable milling machines
- Crushing machines
- Heavy equipment and utility vehicles to abrade or fracture silica materials
- Heavy equipment and utility vehicles for grading and excavating

# Fully & Properly Implementing Controls Specified on Table 1

- Presence of controls is not sufficient.
- Employers are required to ensure that:
  - Controls are present and maintained
  - Employees understand the proper use of those controls and use them accordingly

# Employees Engaged in Table 1 Tasks

- Employees are “engaged in the task” when operating the listed equipment, assisting with the task, or have some responsibility for the completion of the task
- Employees are not “engaged in the task” if they are only in the vicinity of a task

# Respiratory Protection Requirements on Table 1

- Respirators required where exposures above the PEL are likely to persist despite full and proper implementation of the specified engineering and work practice controls
- Where respirators required, must be used by all employees engaged in the task for entire duration of the task
- Provisions specify how to determine when respirators are required for an employee engaged in more than one task

# Alternative Exposure Control Method (Not following Table 1)

- Required if employee exposures are or may reasonably expected to be at or above action level of 25  $\mu\text{g}/\text{m}^3$   
Action Level = 25  $\mu\text{g}/\text{m}^3$  as an 8-Hour TWA
- Exposures assessments can be done following:
  - The performance option
  - The scheduled monitoring option

# Performance Option

- Exposures assessed using any combination of air monitoring data or objective data sufficient to accurately characterize employee exposure to respirable crystalline silica

# What is Objective Data?

- Air monitoring data from industry-wide surveys
- It demonstrates employee exposure associated with a particular:
  - product
  - material
  - process
  - task
  - activity
- **MUST REFLECT WORKPLACE CONDITIONS CLOSELY OR WITH A HIGHER EXPOSURE POTENTIAL**

# Scheduled Monitoring Option

- Prescribes a schedule for performing initial and periodic personal monitoring
- Perform initial monitoring to assess 8-hr TWA exposure
  - 1 or more personal breathing zone samples
  - Exposures of employees:
    - On each shift
    - For each job classification
    - In each work area
    - Sample EE expected to have the highest exposure
  - Where several employees perform same task/shift/work area, employer may sample a representative fraction of these EE.

# Scheduled Monitoring Option

- If monitoring indicates:
  - Initial below the AL: no additional monitoring
  - Most recent at or above the AL: repeat within 6 months
  - Most recent above the PEL: repeat within 3 months
  - When two consecutive non-initial results, taken 7 or more days apart, are below the AL, monitoring can be discontinued
  - Reassess if circumstances change

# Appendix A: Methods of Sample Analysis

- Employers must ensure that samples are analyzed by a laboratory that follows the procedures in Appendix A
- Appendix A specifies methods of sample analysis
  - Allows for use of OSHA, NIOSH, or MSHA methods
  - Analysis must be conducted by accredited laboratories that follow specified quality control procedures

# Employee Notification of Assessment Results

- Within 5 working days of completing exposure assessment:
  - Notify EE of results in writing or,
  - Post the results in an appropriate location accessible to all EE
- Whenever assessment indicates exposure > PEL:
  - Employer shall describe in written notification the corrective action to reduce exposure to or below the PEL

# Hierarchy of Controls

- Engineering controls and/or work practice controls to reduce exposures to or below the PEL.
- Wherever these are not sufficient, the employer shall nonetheless use them to reduce EE exposure to the lowest feasible level.
- Respirators permitted where engineering/work practice controls are not sufficient.

# Respiratory Protection

- Must comply with 29 CFR 1910.134
- Respirators required for exposures:
  - While installing or implementing controls or work practices
  - For tasks not listed in Table 1 or when Table 1 is not fully and properly implemented
  - Where the PEL is exceeded during tasks such as maintenance and repair
  - When all feasible engineering and work practice controls are implemented but are not sufficient

# Housekeeping

- When it can contribute to exposure, employers must not allow:
  - Dry sweeping or brushing
  - Use of compressed air for cleaning surfaces or clothing, unless it is used with ventilation to capture the dust
- Those methods can be used if no other methods like HEPA vacuums, wet sweeping, or use of ventilation with compressed air are feasible

# Written Exposure Control Plan (WECP)

- The plan must describe:
  - Description of tasks involving exposure to respirable crystalline silica
  - Description of engineering controls, work practices, and respiratory protection for each task
  - Description of housekeeping measures used to limit exposure
  - Description of procedures used to restrict access to work areas when necessary (including exposures generated by other employers or sole proprietors)
- Must be made readily available upon request

# Construction - Competent Person

- Construction employers must designate a competent person to implement the WECP.
- *Competent person* is an individual capable of identifying existing and foreseeable respirable crystalline silica hazards, who has authorization to take prompt corrective measures.
- Makes frequent and regular inspection of job sites, materials, and equipment to implement the WECP.
- Review and evaluate effectiveness of WECP annually and update it as necessary.

# Medical Surveillance

- Employers must offer medical examinations to workers:
  - Who will be exposed above the action level for 30 or more days a year
  - No cost to EE; Reasonable time and place
  - Medical examinations shall be performed by a Physician or other Licensed Health Care Professional (PLHCP)
- Exam includes medical and work history, physical exam, chest X-ray, and pulmonary function test (TB test on initial exam only)
- Employers must offer examinations every three years to workers who continue to be exposed above the trigger or if recommended by PLHCP

# 1926.1153(h)(1)(i)

- The employer shall make medical surveillance available at no cost to the employee, and at a reasonable time and place, for each employee who will be required under this section to use a respirator for 30 or more days per year.

Does the standard require employers to count any day during which an employee is required to use a respirator, for any amount of time, as a day of respirator use for purposes of applying the 30-day trigger for medical surveillance?

- Yes. If an employee is required by the standard to use a respirator at any time during a given day, regardless of the duration of the respirator use, that day counts as one day toward the 30-day threshold for medical surveillance. Thus, a "day" of respirator use for purposes of the 30-day threshold does not mean a *full* day of respirator use.

[https://www.osha.gov/dsg/topics/silicacrystalline/construction\\_info\\_silica.html](https://www.osha.gov/dsg/topics/silicacrystalline/construction_info_silica.html)

# Information Provided to PLHCP

- Copy of the standard 1926.1153
- Description of EE's former, current, and anticipated job duties as they relate to occupational exposure of respirable crystalline silica
- Description of levels of occupational exposure
- Description of PPE
- Information of records of previous work-related medical examinations

# Medical Opinion

- Worker receives report with detailed medical findings within 30 days of medical examination
- PLHCP explains to EE the results of examination
- Employer receives a written medical opinion within 30 days of medical examination
  - Date of examination
  - Statement that the examination has met the requirements of this section
  - Any recommended limitations on the EE's use of respirators
  - With EE written consent: recommended limitations on exposure and recommendation to see a specialist if deemed appropriate

# Communication of Hazards

- Employers required to comply with hazard communication standard (HCS) (29 CFR 1910.1200)
- Address: Cancer, lung effects, immune system effects, and kidney effects as part of HCS
- Train workers on health hazards, tasks resulting in exposure, workplace protections, and purpose/description of medical surveillance program
- Identify the competent person
- Make HazCom information readily available upon request

# Recordkeeping

- Must maintain records per 29 CFR 1910.1020 for:
  - Air monitoring data
  - Exposure records maintained and made available per 1910.1020
  - Objective data
  - Medical surveillance program
    - For each EE covered
      - Name and SSN#
      - Copy of PLHCP & specialist medical opinions
      - Copy of information provided to PLHCP & specialists
    - Medical records maintained and made available per 1910.1020

# Training

- Train workers on work operations & ways to limit exposure
- Housekeeping
  - Restricting practices that expose workers to silica where feasible alternatives are available

# Engineering Controls

Grinding stone  
without engineering controls



Polishing stone using water to  
control the dust

# Engineering Controls

Grinding without engineering controls



Grinding using a vacuum dust collector

# Engineering Controls

Jackhammer use without engineering controls



Jackhammer use with water spray to control dust

# Timeline for Compliance

- September 23, 2017
  - Engineering controls shall be in effect
  - Comply with all obligations of standard (except AL trigger for medical surveillance)
- June 23, 2018
  - Exposure assessments
  - Offer medical examinations to EE exposed at or above PEL for 30 or more days
- June 23, 2020
  - Offer medical examinations to EE exposed at or above AL for 30 or more days

# “Short-Term Guidelines”

Some employees in the construction sector perform tasks involving occasional, brief exposures to respirable crystalline silica that are incidental to their primary work. These workers include carpenters, plumbers, and electricians who occasionally drill holes in concrete or masonry or perform other tasks that involve exposure to respirable crystalline silica. Where employees perform tasks that involve exposure to respirable crystalline silica for a very short period of time, exposures for many tasks will be below  $25 \mu\text{g}/\text{m}^3$  as an 8-hour TWA. For

example, for hole drillers using hand-held drills, if the duration of exposure is 15 minutes or less, the 8-hour TWA exposure can reasonably be anticipated to remain under the  $25 \mu\text{g}/\text{m}^3$  threshold (assuming no exposure for the remainder of the shift), and the standard would not apply.

This exception for situations where exposures are not likely to present significant risk to workers allows employers to focus their resources on exposures of greater occupational health concern.

# Iowa OSHA Consultation & Education

Additional information [www.OSHA.gov/silica](http://www.OSHA.gov/silica)

OSHA Consultation & Education

Provide air quality monitoring at no cost

# Small Entity Compliance Guide

for the Respirable Crystalline  
Silica Standard for Construction



## Roadmap for Meeting the Requirements of the Respirable Crystalline Silica Standard

### 1. Determine If the silica standard applies to your employees.

Could employees be exposed to respirable crystalline silica at or above 25 µg/m<sup>3</sup> as an 8-hour TWA under any foreseeable conditions, including the failure of engineering controls, while performing construction activities?

**No:** No further action is required under the silica standard.

**Yes:** Choose to comply with the standard using either the:

- Specified exposure control methods in Table 1, or
- The alternative methods of compliance

### 2. Determine what additional requirements you must meet under the standard, based on the compliance method you are following.

Requirement	Must the Employer Follow this Requirement?	
	If Fully and Properly Implementing Table 1	If Following Alternative Exposure Controls
PEL	No	Yes
Exposure Assessment	No	Yes, when exposures are reasonably expected to be above the action level.
Methods of Compliance	No	Yes
Respiratory Protection	Yes, if respirator use is required by Table 1	Yes, if respirator use is required to reduce exposures to the PEL
Housekeeping	Yes	Yes
Written Exposure Control Plan	Yes	Yes
Medical surveillance	Yes, for employees who must wear a respirator under the silica standard for 30 or more days a year.	
Communication of Hazards	Yes	Yes
Recordkeeping	Yes, for any employees who are getting medical examinations	Yes, for exposure assessments and for any employees who are getting medical examinations

**TABLE 1: Specified Exposure Control Methods When Working with Materials Containing Crystalline Silica**

Equipment/Task	Engineering and Work Practice Control Methods	Required Respiratory Protection and Minimum Assigned Protection Factor (APF)	
		≤ 4 hours/shift	> 4 hours/shift
(iv) Walk-behind saws	<p>Use saw equipped with integrated water delivery system that continuously feeds water to the blade.</p> <p>Operate and maintain tool in accordance with manufacturer’s instructions to minimize dust emissions.</p> <ul style="list-style-type: none"> <li>• When used outdoors.</li> <li>• When used indoors or in an enclosed area.</li> </ul>	None APF 10	None APF 10

Walk-behind saws must be equipped with an integrated water delivery system (commercially developed specifically for the type of tool in use) that continuously feeds water to the blade. The tool must be operated and maintained in accordance with manufacturer’s instructions to minimize dust emissions. Full and proper implementation of water controls on walk-behind saws requires the employer to ensure that:

- An adequate supply of water for dust suppression is used;
- The spray nozzles are working properly to apply water at the point of dust generation;
- The spray nozzles are not clogged or damaged; and
- All hoses and connections are intact.

Table 1 does not specify a minimum flow rate; however, water must be applied at the flow rate specified by the manufacturer.

Walk-behind saws used to cut roads and cut pavement are most commonly used outdoors, though they can also be used indoors to cut concrete floors. When using walk-behind saws indoors or in enclosed areas (areas where airborne dust can

buildup, such as a structure with a roof and three walls), employers must provide additional exhaust, as needed to minimize the accumulation of visible airborne dust. See the section on *Indoors or Enclosed Areas* for more information.

When working outdoors, respiratory protection is not required for work with walk-behind saws regardless of task duration. When working indoors, or in an enclosed location, respiratory protection with a minimum APF of 10 is required regardless of task duration.



Worker using a walk-behind saw with an integrated water delivery system to cut an asphalt roadway.

Photo courtesy of OSHA.

## Sample Written Exposure Control Plan

**Company:**  
John Doe Renovators

**Person Completing the Plan, Title:**  
John Doe, Owner

**Description of Task:**  
Demolishing concrete and tile floors inside homes or public buildings using a jackhammer.

### Control Description

Controls:

- Use jackhammer equipped with the appropriate, commercially available shroud and a vacuum dust collection system with the flow rate recommended by the jackhammer manufacturer, a filter that is at least 99 percent efficient, and a filter cleaning mechanism.
- Use a portable fan to exhaust air and prevent the buildup of dust.

Work practices:

- Check shrouds and hoses to make sure they are not damaged before starting work.
- Make sure the hoses do not become kinked or bent while working.
- Use switch on vacuum to activate filter cleaning at the frequency recommended by the manufacturer.
- Replace vacuum bags as needed to prevent overfilling.
- Use the jackhammer and vacuum controls according to manufacturer's instructions for reducing the release of visible dust.
- If visible dust increases, check controls and adjust as needed.

Respiratory protection:

- Use respirator with APF of 10 the entire time the task is being performed.
- See the written respiratory protection program for information on selection, training and fit testing requirements, in addition to proper use instructions for respirators (for example, being clean shaven when using a respirator that seals against the face).

Housekeeping:

- Dust containing silica on work surfaces and equipment must be cleaned up using wet methods or a HEPA-filtered vacuum.
- Do not use compressed air or dry sweeping for removing dust and debris containing silica from work surfaces.
- Dispose of used vacuum bags in a container and keep the container sealed.

**Procedures Used to Restrict Access to Work Areas:**

Schedule the work so that only employees who are engaged in the task (the jackhammer operator and employees helping the operator) are in the area.

# On-Site Consultation





# Consultation (Voluntary Compliance)

# Enforcement (Regulatory Compliance)

### Inspection Priorities:

- On-Site Consultation Program offers no-cost and confidential services to small/medium-sized businesses.
- Consultation services are separate from enforcement and do not result in penalties or citations.
- Consultants work with employers to identify workplace hazards, provide advice for OSHA compliance, and assist in establishing and improving safety and health programs

- Imminent danger
- Catastrophes / fatalities
- Worker complaints and referrals
- Targeted inspections - high injury/illness rates, severe violators
- Follow-up inspections

Below are the adjusted maximum penalty amounts that will take effect in 2019 upon publication in the Federal Register.

Type of Violation	Penalty
Serious	\$13,260 per violation
Other-Than-Serious	
Posting Requirements	
Failure to Abate	\$13,260 per day beyond the abatement date
Willful or Repeated	\$132,598 per violation

# How can OSHA Compliance help me?

## Consultants can provide:

- ✓ On-site safety and health audits
- ✓ Workplace air and noise monitoring
- ✓ Safety and Health program review and assistance
- ✓ Assessments of Safety and Health management practices
- ✓ Safety and Health training and education
- ✓ Technical guidance and information
- ✓ Available for seminars, workshops, and speaking events

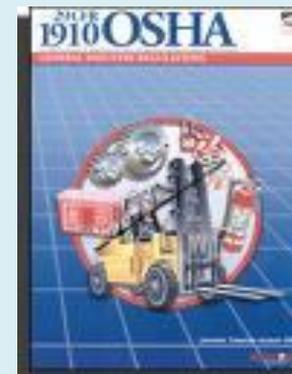
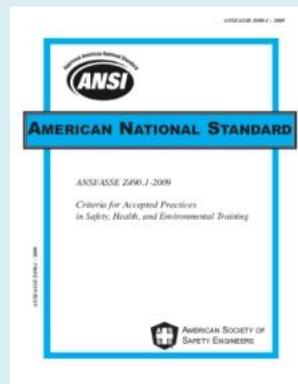


# Consultation Services

## (Voluntary Activity)

- Totally separate from Enforcement
- Do not result in penalties or citations 
- Any information you provide about your workplace is confidential 
- Any unsafe or unhealthful working conditions that the consultant discovers will not be routinely reported to the OSHA inspection staff

# Walk Through:



- Consultants will visit the entire workplace or the specific operations you designate and discuss the applicable OSHA standards
- OSHA strongly encourages maximum employee participation
- Consultants also will point out other safety or health risks that might not be cited under OSHA standards, but nevertheless may pose safety or health risks to your employees
- May suggest and even provide other measures such as safety and health training you and your employees can use to prevent future hazardous situations.

# Your only obligation will be:

- ❑ Commit yourself to correcting serious job safety and health hazards
- ❑ Carry out the commitment in a timely manner



# How to Request Consultation Services:

The screenshot shows a web browser window with the URL <https://www.iowaosha.gov/iowa-osha-site-consultation> highlighted in a red box. The website header includes the Iowa Workforce Development logo and a search bar. The main navigation menu contains links for Home, Contact, Forms, File a Complaint or Report, and Boards. The page title is "IOWA OSHA ON-SITE CONSULTATION".

**DIVISION OF LABOR QUICK LINK RESOURCES**

- [Amusement Rides](#)
- [Asbestos Abatement](#)
- [Athletic](#)
- [Bidder Preference](#)
- [Boilers & Pressure Vessels](#)
- [Child Labor](#)
- [Contractor Registration](#)
- [Elevators & Escalators](#)
- [Employment Agencies](#)
- [Iowa OSHA](#)
- [Wage](#)

**IOWA OSHA ON-SITE CONSULTATION**

Iowa OSHA's On-Site Consultation Service helps Iowa employers comply with the OSHA standards and remove hazards. On-Site Consultation may identify hazards; review written safety and health programs; review OSHA 300 logs for injury and illness trends; monitor exposure to fumes, dusts, or noise; and, evaluate engineering controls. These services are free, confidential, and separate from Iowa OSHA enforcement. Citations and penalties will not be issued if the employer corrects serious safety and health hazards.

Upon written request from an employer, trained Industrial Hygienists and/or Safety Consultants will visit the workplace, assist in identifying hazards, and help improve the employer's safety and health management system. Private or public sector employers may request Iowa Consultation services by completing the [request for on-site services](#).

Employers that meet the size limitations may participate in the Iowa OSHA Consultation Safety and Health Achievement Recognition Program (SHARP). The program recognizes employers who have demonstrated exemplary achievements in workplace safety and health. To qualify for SHARP an employer must receive a comprehensive consultation visit, correct all identified hazards, adopt and implement effective [safety and health management systems](#), and, agree to further consultative visits if major workplace changes occur. Employers that qualify may be exempt from some Iowa OSHA inspections for one year.

**QUICK LINKS**

- [Request On-Site Visit](#)
- [Iowa OSHA Education Services](#)
- [Iowa OSHA Cooperative Programs](#)
- [Administrative Rules and Iowa Code](#)
- [Contact Iowa OSHA Consultation](#)
- [Report an Issue with this Page](#)
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At the bottom of the page, there are links for [IowaWorkforceDevelopment.gov](#), [Website Feedback](#), [Search](#), and [State of Iowa Policies](#). A footer note states "A proud partner of the American Job Center network".

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## Request for On-Site Visit

FOR OFFICE USE ONLY	
Date received:	
Date of visit:	

Business Name				
Site address		City	State	Zip
Mailing address		City	State	Zip
Contact Person	Title	Email address		
Phone number	Cell number	Fax number		
How did you learn of our services?				
What type of visit are you requesting? <input type="checkbox"/> Safety <input type="checkbox"/> Health <input type="checkbox"/> Safety and Health				
Total number of employees at site:	Total number of employees controlled nationwide:			
NAICS code/Business type	Have you had an OSHA enforcement visit in the last 12 months? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, dates:			
Union Representation? <input type="checkbox"/> Yes <input type="checkbox"/> No	Union name (if applicable)		Phone number	
Union address		City	State	Zip

I understand that consultation services are made available to me at no cost through Federal and State funds. I further understand that, following the on-site survey, I will receive a written report and that the Consultant will preserve in confidentiality all information obtained as a result of the survey. There will be no penalties or fines assessed. The results and recommendations in this report are based on the conditions that were present during our survey and on the best information available to the consultant at the time of the survey, and do not replace any other needed or required safety or health monitoring for your facility. The advice and written report of the Consultant will not be binding on an OSHA Compliance Officer in the event of an inspection, nor shall the failure of the Consultant to identify a specific hazard affect the regular conduct of an OSHA Compliance Officer.

I agree to correct all serious hazards, which are identified by the Consultant, and to allow the Consultant to confer with individual employees, as necessary during the course of the visit, in order to identify and judge the nature and extent of particular hazards. If there is a recognized employee representative, I agree to allow that representative the opportunity to participate in the opening and closing conference and to accompany the consultant and the employer's representative during the physical walk through of the workplace. In the event that serious hazards are identified in the written report, I agree to post, unedited, the List of Hazards at a prominent location where it is readily observable by all employees for three working days or until the hazard has been corrected, whichever is later.

If difficulties are encountered in correcting serious hazards within the established time frame, an extension may be granted. These extensions must be requested in writing on or before the correction due date along with an explanation of the interim protection taken to prevent injuries or illnesses. A form for that purpose is included in the written report.

Name of individual completing form	Signature	Title	Date

Equal Opportunity Employer/Program  
 Auxiliary aids and services are available upon request to individuals with disabilities.  
 For deaf and hard of hearing, use Relay 711.



- Identify Yourself / Show Credentials / Distribute & Collect Business Cards
- Scope of Survey - Full/Limited
- Employee representation: Union / Non Union / Joint Safety Committee Rep.
- List of Opening Conference Participants / Use Attendance Sheet if applicable
- Working with Enforcement?
- Consultation in Progress
- Explain Enforcement Precedence: Fatality / Catastrophe / Complaint / Follow-Up
- Explain Consultation: Relationship to Enforcement
- Costs for Services / Employer Incurred Costs
- Explain Confidential Nature of Visit (When it becomes non-confidential)
- No Citations / Penalties
- Right to Interview Employees
- Types of Hazards: Imminent Danger / Serious / Other-Than-Serious
- Walk-Through / Participants / Union Rep. / Maintenance / Safety Committee Rep.
- We may miss items. / Not our intent to find every instance of a violation
- Employer Take Own Notes
- Encourage Interim Protection

**Employer Obligations - Must Agree To:**

- Post "List of Hazards" for 3 Days or until ALL hazards are corrected (form included with Report)
- Correct Imminent Dangers Hazards Immediately
- Correct Serious Hazards in agreed upon time frame
- Correct Imminent Dangers / Serious Hazards identified through termination of visit
- Actively implement an effective Safety and Health Program

**Employers Rights in Using Consultation:**

- May Terminate the visit at any time
- May Change or Limit the Scope of the Visit at any time
- May Appeal the Consultant's Findings within 15 Days after Receipt of Written Report
- Request Written Programs
- Request OSHA Logs and Summaries



Saw Operators – 1.5 x PEL in 3.5 hours



Saw cut cleaner – 3 x PEL in 4.5 hours



Joint Sealer – No silica detected

# Jobsite Hazards

# Reinforcing Steel

1926.701(b)

Guard protruding, reinforcing steel



# Power Concrete Trowels

1926.702(c)

- Manually guided concrete troweling machine must be equipped with:
  - Automatic control switches shut off power when hands are removed.



# Concrete Buggies

1926.702(d)

Concrete buggy handles must not extend beyond the wheels on either side of the buggy.



# *Working Around Vehicles and Heavy Equipment*

- On-foot workers should be trained to work safely around equipment
  - Wear high visibility clothing
  - Do not assume operators can see you
- Signal person may be used to assist the operator
- Good communication is essential
  - Use standardized hand signals
  - Use walkie-talkies (two-way-radios)

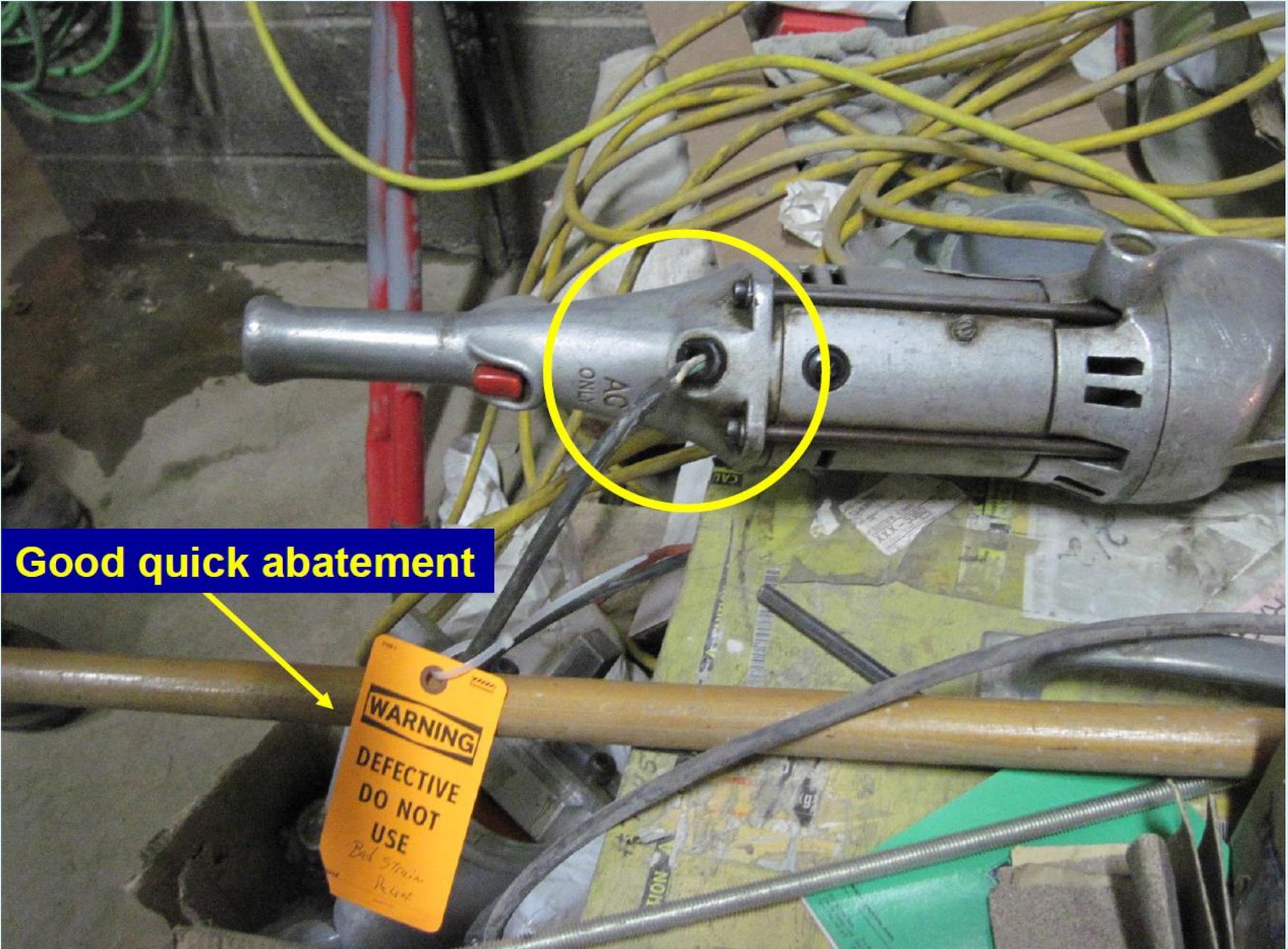


This worker is clearly visible!

# *Common OSHA Citation*

*No backup alarm on equipment with an obstructed view to the rear.*

- Most fatalities are the result of equipment running over employees.
- Constant signals may be “tuned out” and ignored because they become part of the work environment.



**Good quick abatement**

**WARNING**  
**DEFECTIVE**  
**DO NOT**  
**USE**  
*Bob Strain*  
*Permit*



**Also good and quick abatement of a hazard  
(cut off the male end)**



**Duct tape and old**

# Questions?

