

OSHA's new Silica Rule went into effect on September 23, 2017. Since then, customers have asked how it impacts their compliance obligations. We hope the following information provides you greater insight. However, it is strongly recommended that you consult with your safety and regulatory experts, as well as industrial hygienists to confirm what is required.

Q: What is the new OSHA Silica Rule?

A: OSHA's new silica rule is meant to protect workers from exposure to respirable crystalline silica (RCS) on jobsites. The Rule establishes a new 8-hour time-weighted average (TWA) Permissible Exposure Limit (PEL) of 50 $\mu\text{g}/\text{m}^3$, an action level (AL) of 25 $\mu\text{g}/\text{m}^3$ and a host of ancillary requirements.

Q: What is RCS?

A. Respirable crystalline silica is a common mineral found in many naturally occurring and man-made materials.

Q: Does silica free joint compound exist?

A: There are no ready-mixed joint compounds that exist that are 100% "silica free." However, the amount of respirable crystalline silica in USG joint compounds is low.

Q: Does silica exist in USG Ready-Mixed Joint Compounds?

A: RCS is a natural impurity in the raw materials used to manufacture USG ready-mixed joint compound, and varies by product, depending on product formulation and raw material source. If RCS is present, it will be indicated in Section 3 of the Safety Data Sheet (SDS), as required by OSHA.

Q: How does the new silica rule apply to USG Sheetrock® Brand ready-mixed joint compound?

A: The silica rule is a jobsite regulation designed to protect workers from all RCS exposures above 50 $\mu\text{g}/\text{m}^3$, which is the PEL as defined by OSHA. Under normal jobsite conditions, industrial hygiene testing conducted by a third-party, indicated that the sanding of USG Sheetrock® Brand ready-mixed joint compound, unless otherwise specified on packaging and within the SDS, does not contain RCS above the PEL.

Q: What is the difference between labels on packaging and job site requirements?

A: OSHA's Global Harmonization Standard (GHS) covers global hazardous material warnings on packaging. RCS is covered within the OSHA Hazard Communication Standard (2012), which is a job site regulation. The key difference between GHS and the new RCS regulation is that

contractors are responsible for jobsite conditions, regardless of manufacturer packaging and/or SDS literature.

Q: Does USG have a low dust joint compound?

A: Yes. USG Sheetrock® Brand Dust Control Joint Compound (www.usg.com/dustcontrol) was specially formulated to reduce airborne dust. Under NIOSH and OSHA guidance, this technology ~~could be~~ considered an engineering control. However, you are still responsible for maintaining jobsite conditions and compliance with the new silica rule.

Q: Where is drywall finishing specifically discussed in the OSHA regulation?

A: Page 469 of regulation 29 CFR 1926.1153.

Q: What do contractors need to do to comply?

A:

- Establish and implement a written exposure control plan for each jobsite (for assistance, visit <http://plan.silica-safe.org>)
- Identify and assign an individual with an understanding of RCS compliance obligations
- Communicate hazards and train employees

For additional information, visit OSHA's website at <https://www.osha.gov/dsg/topics/silicacrystalline/construction.html>

Conclusion: The obligations of construction employers under the new OSHA rule are not determined by USG's packaging or product labels. OSHA requires that employers take steps to protect workers from respirable crystalline silica exposures from all possible sources, and under the new Rule, employer compliance obligations begin on the jobsite if any products used on the job contain even small amounts of respirable silica.