

HOW OSHA'S SILICA PROPOSAL IMPACTS CONSTRUCTION

WHAT IS CRYSTALLINE SILICA?

Silica is one of the most abundant substances on earth and is most commonly found as sand or quartz. Silica is ubiquitous on construction sites by virtue of its presence in many commonly used construction materials **including: concrete, bricks, rocks, and stones.**

WHAT ARE THE CURRENT REQUIREMENTS?

OSHA measures silica by Permissible Exposure Limit (PEL), which is the maximum amount of silica to which a worker may be exposed to during an 8-hour shift of a 40-hour week. The current PEL for silica exposure for the construction industry is **250 micrograms per cubic meter of air.**

The Construction Industry Safety Coalition (CISC) shares OSHA's desire to ensure that all workers are protected from unsafe levels of silica exposure and the illnesses that it creates. Our organizations and their respective members encourage OSHA to work with the construction industry to ensure the positive reduction in silicosis-related diseases and fatalities continues.

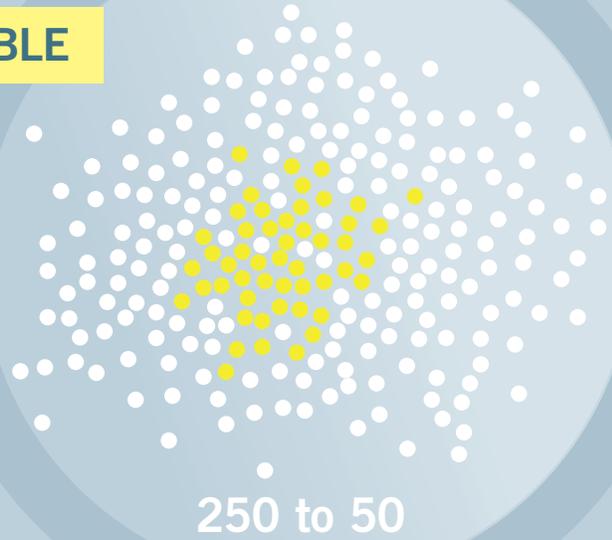
CISC is comprised of 25 trade associations representing virtually every aspect of the construction industry—from home building, to commercial and road construction, to heavy industrial production, to specialty trade contractors and material suppliers. The mission of the coalition is to promote healthy and safe jobsites in our industry.

OSHA'S PROPOSAL FOR CONSTRUCTION IS...

TECHNOLOGICALLY INFEASIBLE

OSHA's proposal reduces the PEL from 250 to 50 micrograms per cubic meter of air. However, OSHA has not shown that the proposed PEL can be met by the construction industry in most operations most of the time.

1968



UNNECESSARY

93%
DROP IN
SILICA-RELATED
DEATHS

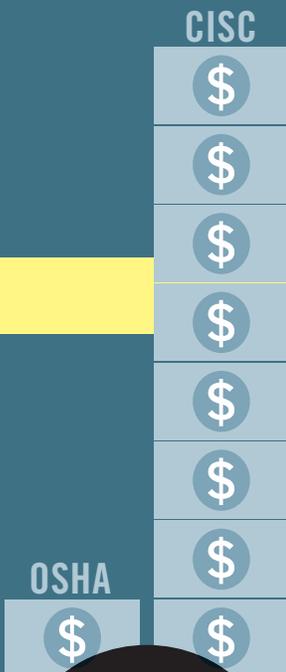
According to the Centers for Disease Control and Prevention, there has been a 93 percent drop in silica-related deaths between 1968 and 2007.

By issuing its proposal, OSHA missed opportunities to emphasize compliance of the current standard and to work with industry to improve awareness.

2007

ECONOMICALLY INFEASIBLE

The Construction Industry Safety Coalition (CISC) commissioned an independent analysis of OSHA's economic data. CISC estimates that compliance with OSHA's proposed standard would cost the industry nearly \$3.9 billion per year—an amount nearly eight times larger than OSHA's estimate.



Cost
8X
larger than OSHA's
estimate

	OSHA Estimate	CISC Estimate*
Engineering Controls	242.6	3,334.1
Program Requirements		
Respirators	84.0	108.9
Exposure Assessment	44.6	132.6
Medical Surveillance	76.0	184.6
Training	47.3	102.6
Regulated Areas	16.7	29.1
Program Subtotal	268.6	557.8
Total (millions of dollars)	511.2	3,891.9

*Economic analysis performed in 2013-2014 by Environomics, Inc..