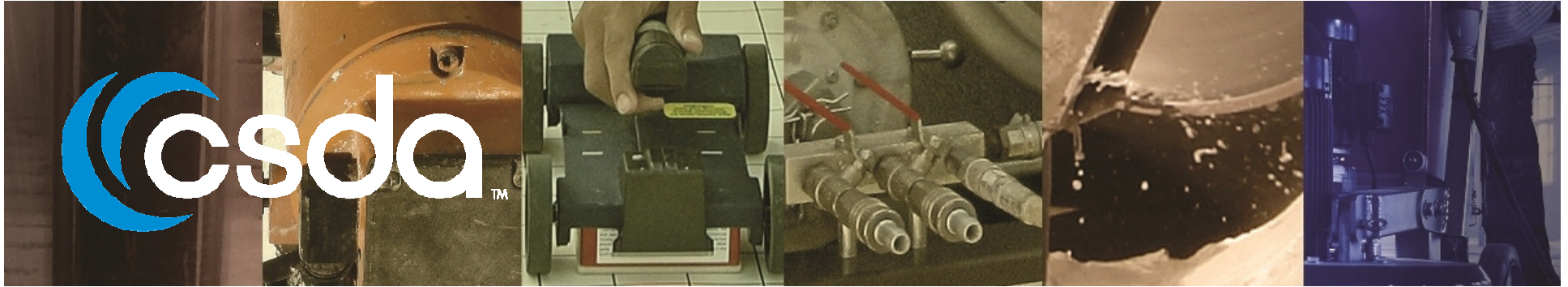




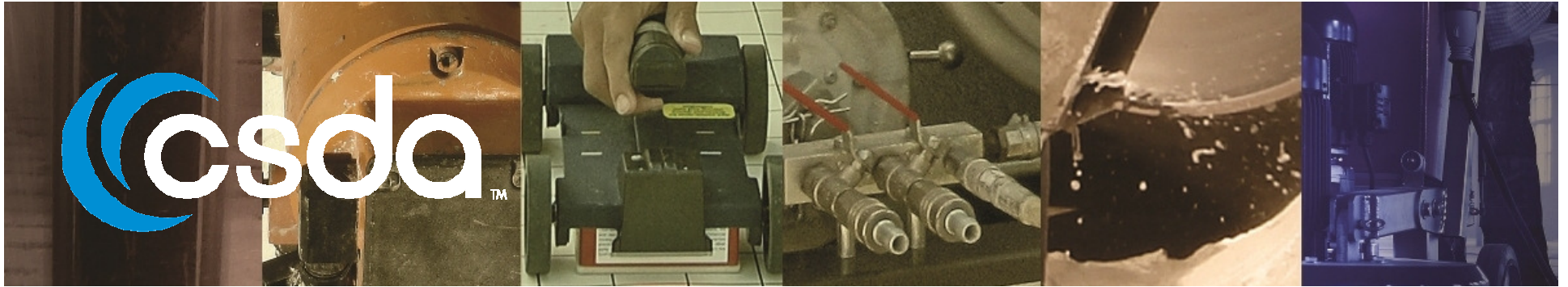
CONCRETE SAWING & DRILLING ASSOCIATION

**OIRA-OMB
Occupational Exposure to Respirable
Crystalline Silica
February 22, 2016**

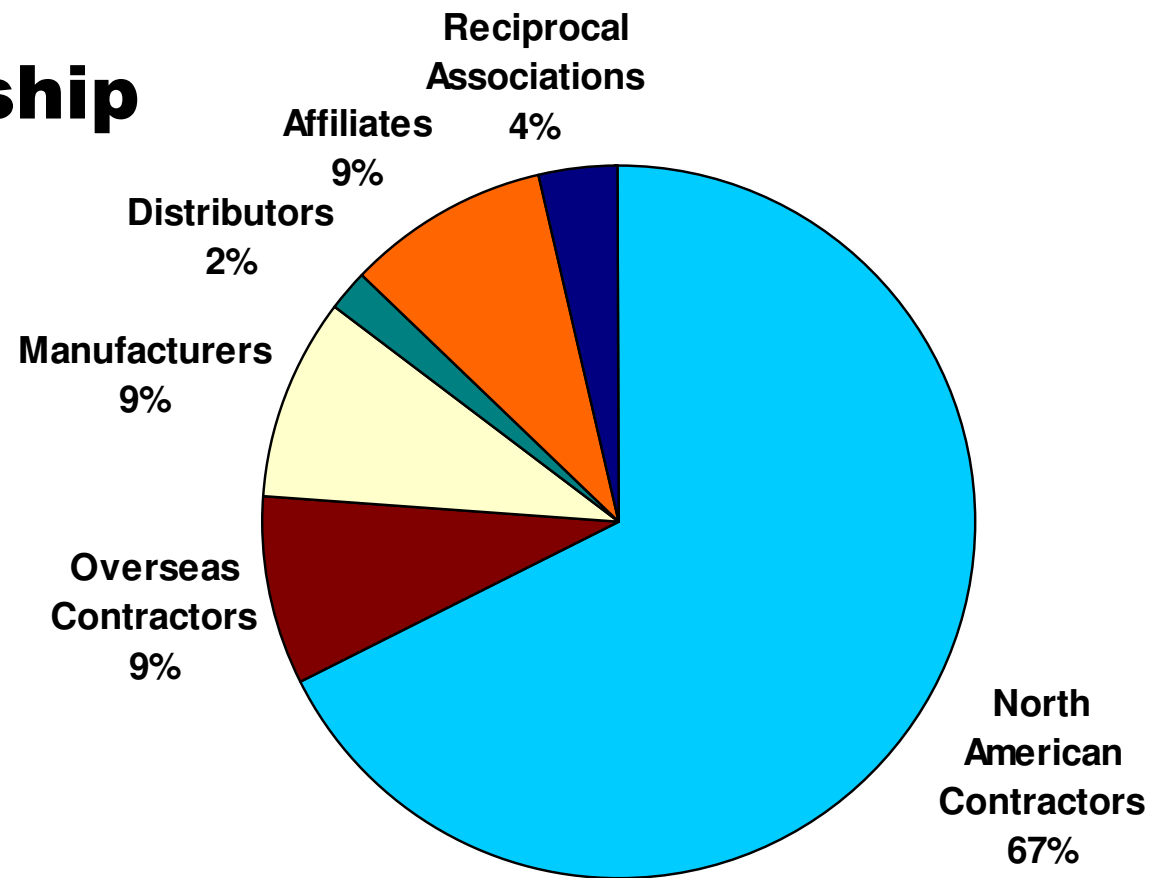


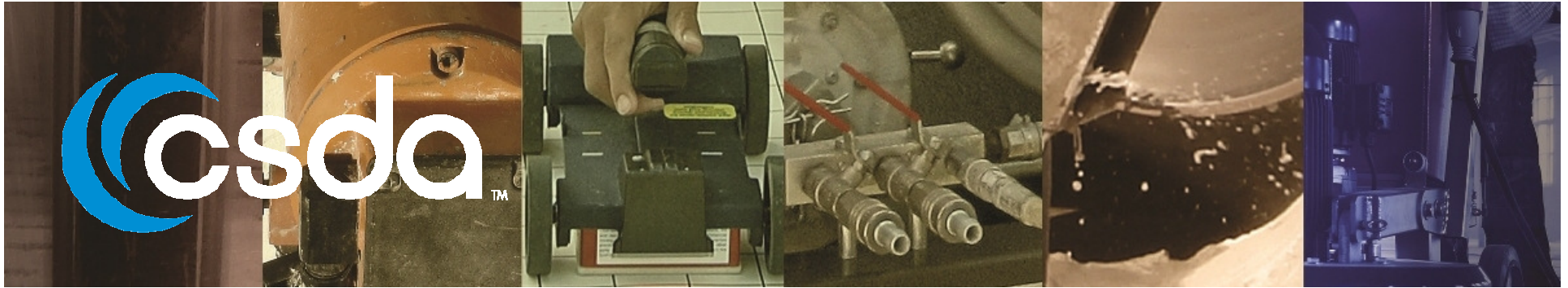
Association History & Information

- **Concrete Sawing & Drilling Association Founded 1972**
- **Mission: Promote the use of professional cutting, polishing, imaging and selective demolition contractors and their methods. CSDA Code of Ethics demands pursuit of the highest standards of safety, quality and integrity**
- **500 Member Companies**
- **President – Kevin Baron**
- **Executive Director – Pat O'Brien**



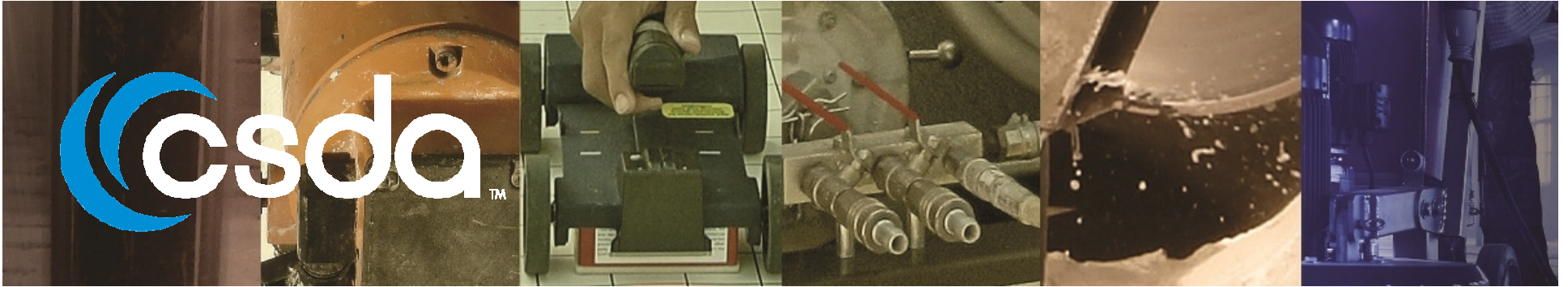
CSDA Membership





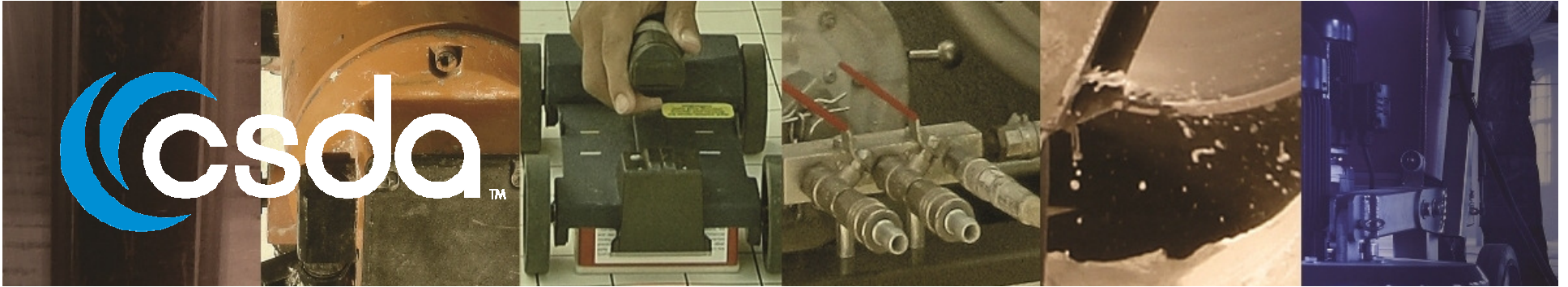
CSDA Safety

- **CSDA Safety Committee**
 - **Safety Handbook:**
 - **Operators**
 - **45 Pages, English/Spanish**
 - **Reviewed by OSHA**
 - **Safety Manual:**
 - **Companies**
 - **230 Pages**
 - **108 Toolbox Safety Tips (TST)**
 - **Best Practices Series**
 - **Safety Video/DVD Series of Six**
 - **Cooperative Effort with Contractors & Manufacturers**



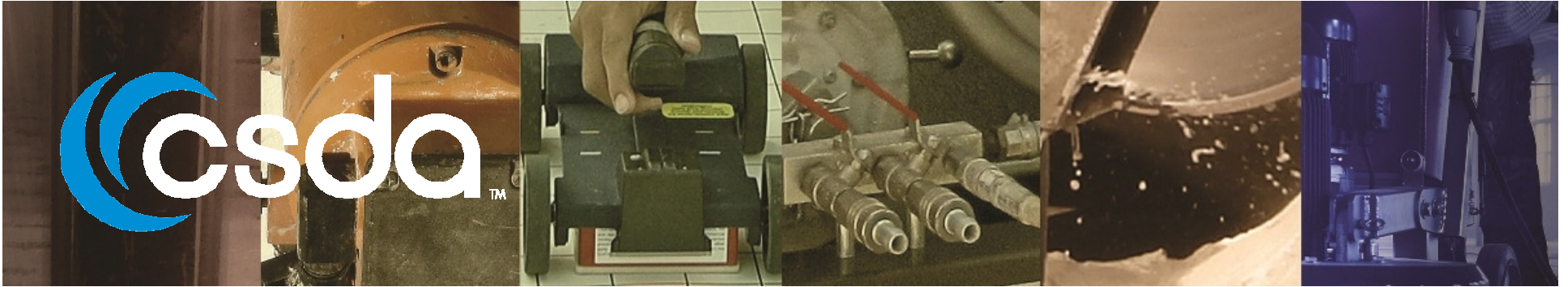
CSDA Safety

- **OSHA Alliance**
 - **Best Practices Jointly Produced**
 - **Alliance Webpage**
 - **CSDA provided OSHA space in its booth at World of Concrete**
 - **CSDA Sponsored OSHA Presentations at WOC**
 - **Design for Safety Workgroup**
 - **OSHA Unofficially Reviewed Safety Documents**
 - **OSHA Articles Featured in *Concrete Openings***
 - **Started in 2008 – Concluded in 2015**



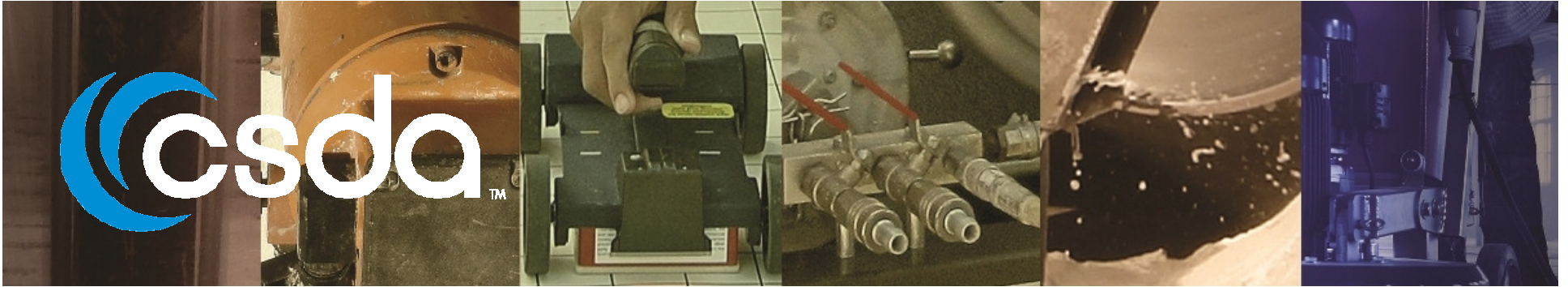
CSDA Training

- **Extensive CSDA Training Programs**
 - **30 Training Courses & 5,000 Graduates**
 - **Operator & Company Certification Programs**
 - **Classroom, Hands-On, Site-Specific & Online**
 - **Training Facility in Partnership with St. Petersburg College**
 - **NIOSH Visits to Classes & Convention Presentations**
 - **Instructors / Manuals Approved by Training Committee**
 - **Cooperative Effort with Contractors & Manufacturers**



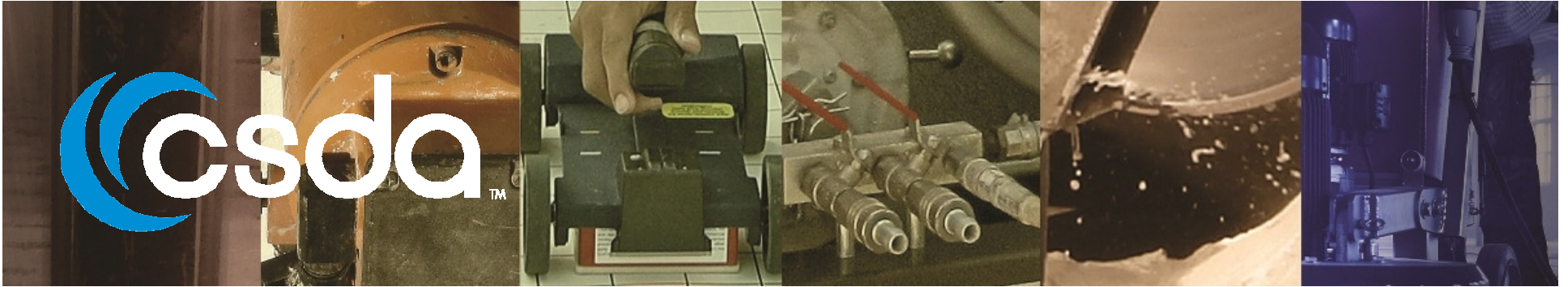
CISC - Proposed Rule Does Not Work in the Construction Industry

- **With the exception of Table 1, OSHA simply adopts the general industry standard for the construction environment – this does not factor in the transient, variable & mobile nature of construction**
- **The nature of construction work, combined with the presence of silica on job sites, makes the “historical” general industry health standard approach inapposite**
- **CISC has requested that OSHA withdraw the proposed rule**



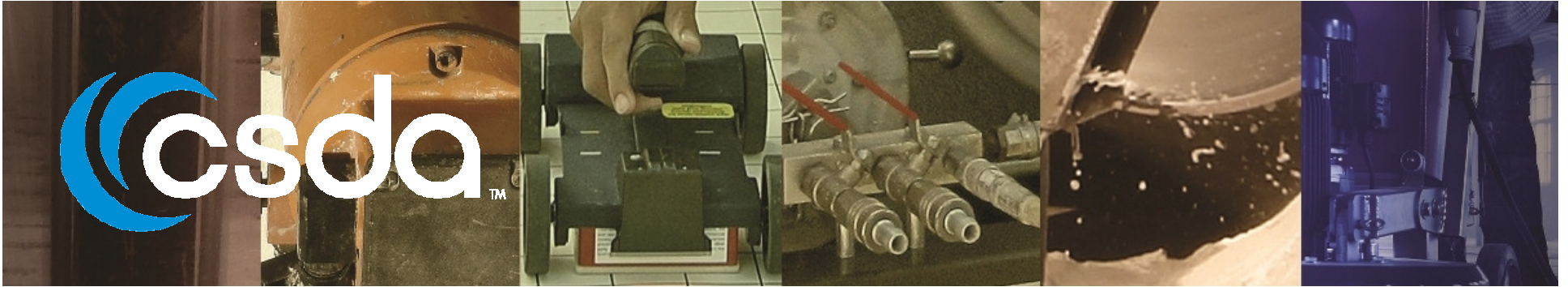
CISC - Proposed Rule Does Not Work in the Construction Industry

- Proposed exposure monitoring, medical surveillance, and regulated area requirements present significant compliance challenges:
 - *As stated by AIHA "... the reality is that potential worker exposures on a construction site are constantly changing. By the time samples are collected and analyzed, tasks may have been completed and workers have disbursed to other jobs, which may minimize the usefulness of monitoring results." Tr. at 1038.*
 - This is especially true for the cutting industry



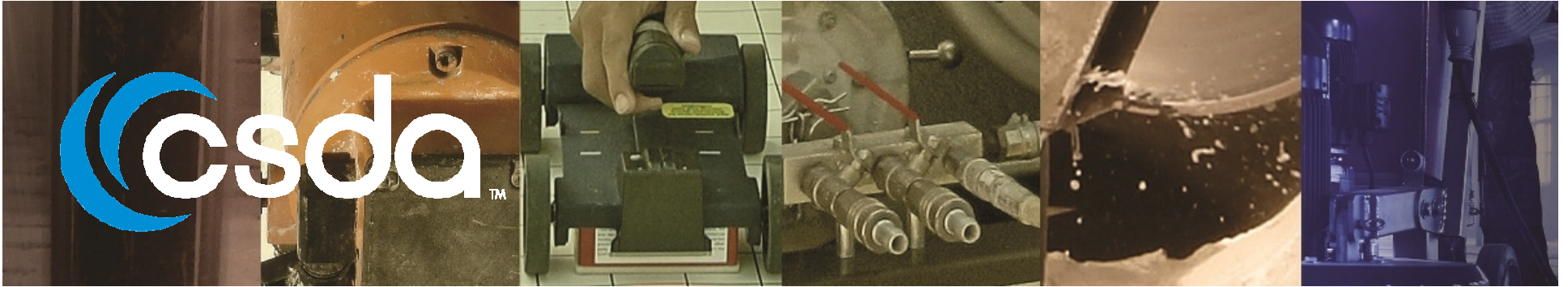
CSDA & Cutting Segment of the Construction Industry

- **Renovation a Major Segment for Cutting Contractors**
 - **Renovation Much Different than New Construction**
 - **Cutting Contractors Work Indoors, Outdoors & Often in Commercial Buildings**
 - **OSHA Focus on Rule is Outside**
 - **Other Trades Inside the Building a Major Issue on Silica Levels**



CSDA & Cutting Segment of the Construction Industry

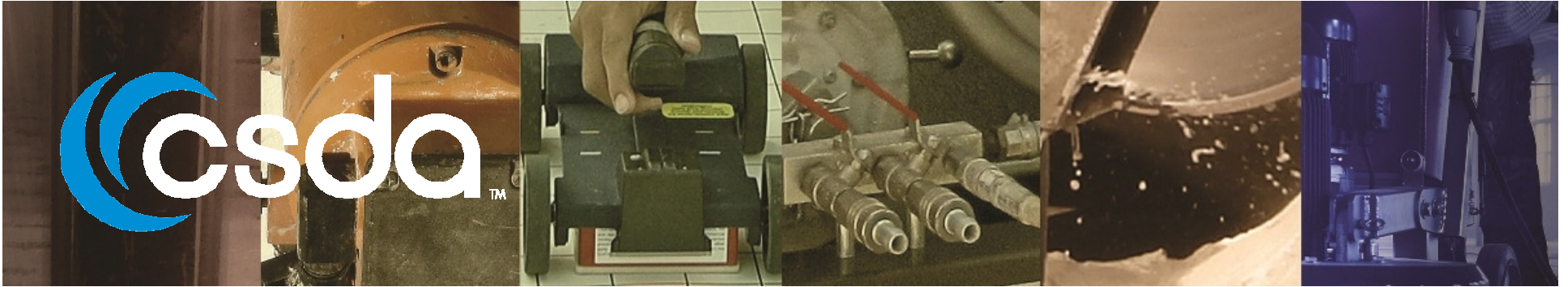
- **Many Different Types of Cutting Operations**
 - **Slab Sawing**
 - **Core Drilling**
 - **Wall Sawing**
 - **Hand Sawing**
 - **Wire Sawing**
 - **Selective Demolition**
 - **Grinding/Grooving**
 - **Polishing**



CSDA & Cutting Segment of the Construction Industry

- **Cutting Industry is Different**
 - **98% of Cutting Done Wet**
 - **Increases Life of Diamond Tool**
 - **Greatly Minimizes Entry of Silica in the Air**
 - **Cutting Contractors Small Businesses**
 - **Annual Revenue \$2.7 Mil Avg / \$1.9 Mil Median***
 - **15% Have Revenue <\$500,000***
 - **FTEs 22 Average / 14 Median***
 - **3,000 Cutting Companies**

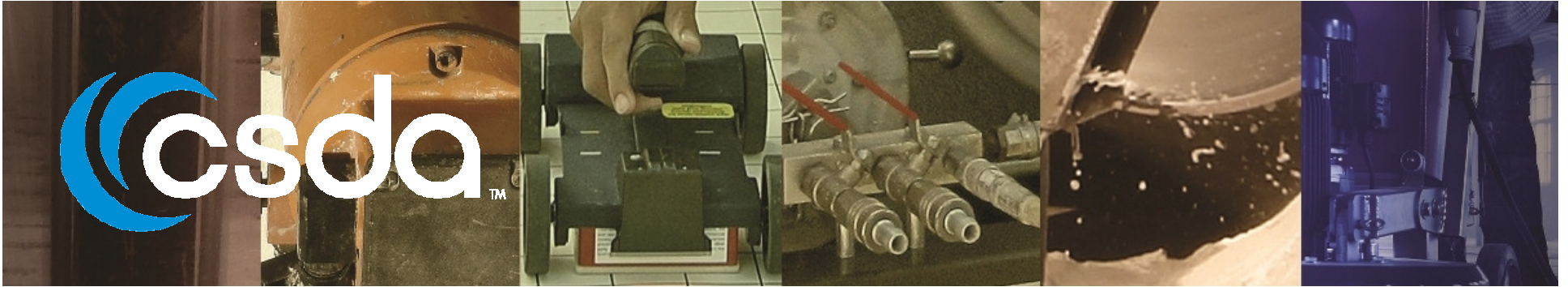
*** Source CSDA Financial & Administrative Survey Dated Feb 2015**



CSDA & Cutting Segment of the Construction Industry

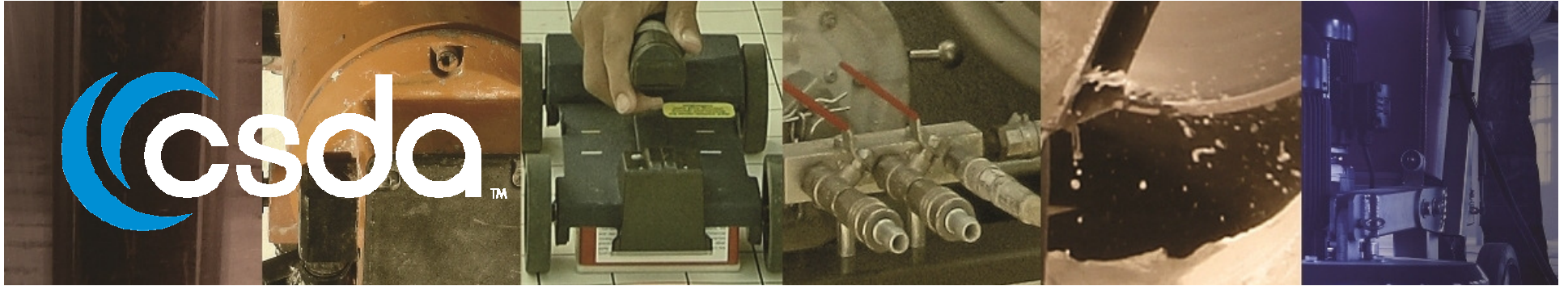
- **What Does this Mean?**
 - **Typical Company Operates Fully Equipped Trucks with One Operator**
 - **Average Revenue per Truck - \$225,000***
 - **Approximately 10 Trucks for Average Company**
 - **One Operator/Truck Visits 3-5 Different Jobsites/Day for 1-3 Hours**
 - **Exposure Monitoring a Challenge for Cutting Contractors**
 - **Competent Person(s) Requirement a Challenge**

90,000 Jobsite Visits per Day



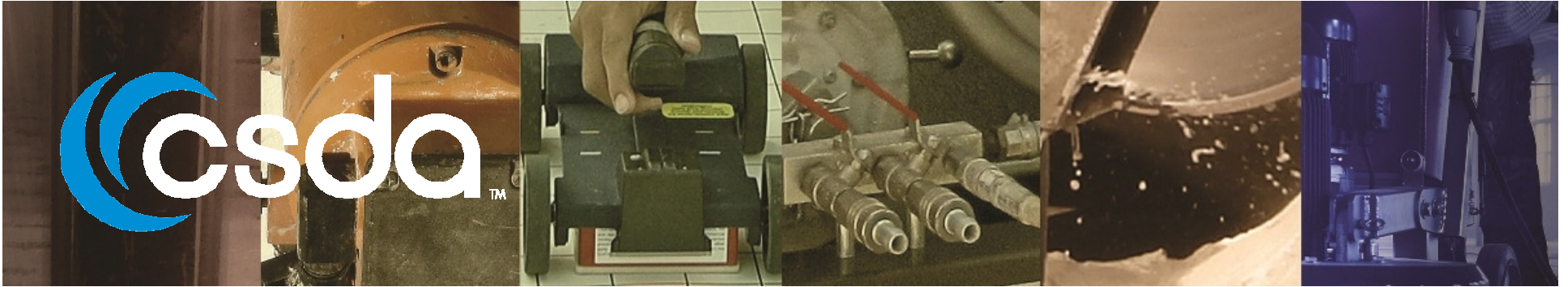
CSDA Concerns for New Silica Rule

- **Unenforceable for Cutting Contractors**
 - **Number of Jobsites, Operators & Time on Sites**
 - **Working on Someone Else's Jobsite**
 - **Renovation of Old Structures Challenging**
 - **OSHA Failed to Understand Cutting Industry**
- **Sample Collection & Analysis**
 - **Huge Cost Issue for Multiple Sites/Operators/Day**
 - **Additional Employees Required for each Collection**
 - **Time to Receive Results an Large Issue**
 - **Operator May only be on Site for 1-3 hours and Never Return + Challenge for TWA Readings**



CISC - Occupational Exposure to Respirable Crystalline Silica (Docket No. OSHA 2010-0034)

- **OSHA's proposed rule is unworkable in the construction industry**
- **OSHA has not demonstrated that a PEL of 50 can be reached in construction in most operations most of the time.**
- **OSHA has not demonstrated that a PEL of 50 is economically feasible in construction**



Summary Challenges - Cutting Industry

- **OSHA Needs to Understand the Construction Industry Before Trying to General Industry Regulations**
- **OSHA Needs to Offer “Construction Simple” Solutions – Complicated Sampling will Not Work**
- **OSHA Should Work with Industry**
- **Implementation of this Rule will Place Undue Financial Burdens on Small Businesses or Put them Out of Business**



CONCRETE SAWING & DRILLING ASSOCIATION

www.csda.org

