

DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF OCCUPATIONAL SAFETY AND HEALTH

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Juliann Sum, Chief

November 08, 2017

Christopher Lee


Dear Mr. Lee,

This letter is in response to your inquiry regarding title 8 section 1532.3 "Occupational Exposures to Respirable Crystalline Silica." You requested information on water delivery systems during jackhammering discussed in table 1 of section 1523.3.

Your specific question is the following:

Under Table 1, construction task "x" - Jackhammers and handheld powered chipping tools, it states that an employer should use a tool with water delivery system that supplies a continuous stream or spray of water at the point of impact

In the federal OSHA publication "Small Entity Compliance Guide for the Respirable Crystalline Silica Standard for Construction" (page 17) it states that "The water delivery system is not required to be integrated or mounted on the tool; it can be assembled and installed by the employer. However, it must deliver a continuous stream or spray of water at the point of impact."

Will Cal/OSHA accept the federal guidance in that the water delivery system need not be integrated or mounted on the tool, rather assembled and installed by the employer so that a continuous stream or spray of water at the point of impact is delivered?

Cal/OSHA Response:

Like the federal regulation, there is no requirement in title 8 section 1532.3 that water systems be integrated or mounted on jackhammers and handheld powered chipping tools.

Sincerely,

Handwritten signature of Eric Berg in blue ink.

Eric Berg

Deputy Chief

Cal/OSHA Research and Standards