

Berg, Eric@DIR

From: christopher lee <[REDACTED]>
Sent: Tuesday, September 26, 2017 4:10 PM
To: Berg, Eric@DIR; Smith, Steve@DIR
Subject: T8, Section 1532.3

Good afternoon -

I would very much appreciate clarification on a fairly narrow issue in the revised respirable crystalline silica standard.

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?

Thank you very much.

Regards,

Chris

Christopher Lee
Safety Consultant to United Contractors

[REDACTED]
[REDACTED] cell)