

Miller, Diane M. (CDC/NIOSH/EID)

From: stuart.bailey@pinnacol.com
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To: NIOSH Docket Office (CDC)
Subject: 184 - Draft National Manufacturing Agenda Comments

Name
Stu Bailey

Organization
Pinnacol Assurance

Email
stuart.bailey@pinnacol.com

Address
7501 E. Lowry Blvd
Denver, co 80230
USA

Comments

RE: NAICS 32991 Granite Countertop fabrication Too much attention is paid to the amount of silica measured on the day of monitoring. Attention should be focused on the mg/m³ of respirable dust. Silica content can vary and place an employer in compliance status when they are endangering their employees.

In my research and thesis, I have compiled a graph with the %silica and respirable particulates obtained over several years of monitoring (upwards of 200 samples. 95% of the samples were at 20% silica or lower. When this is plugged into the OSHA PEL calculation, the result is 0.45 mg/m³. This equation is equivalent to 0.10 mg/m³ of respirable silica. NIOSH has determined employees exposed at this concentration over a lifetime of work are at a significant risk for lung disease.

Engineering controls, such as stand fans, to blow mist away from the fabricator, and the splash guard (Alpha Tools) should be promoted.

I don't have any connection with Alpha Tools. I am just passionate about silica exposures in marble and granite shops. Controls are available that work. Employers and employees must be educated in their use, effectiveness, and the consequences and severity of overexposure to silica.