TOOLBOX TALK #17

A QUESTION ON SILICA – PART 1

Question: *In regard to Table 1 in the RCS standard for construction, what does OSHA mean by an "integrated water delivery system"? Can the system be designed and installed by the employer? If so, what are the requirements for construction of this system? Does the system need to be connected to the tool in some way to be considered integrated? Would an independent pressurized water sprayer operated by a second employee meet the requirements of an "integrated water delivery system"?*

Response: Seven of the entries on Table 1 use the term "integrated water delivery system". As stated in the preamble to the RCS standard, "OSHA is requiring the use of an integrated water delivery system supplied by the equipment manufacturer … OSHA is requiring the use of systems that are developed in conjunction with the tool because they are more likely to control dust emissions effectively by applying water at the appropriate dust emission points based on tool configuration and not interfere with other tool components or safety devices".

Thus an "integrated water delivery system", for purposes of Table 1 of the RCS standard for construction, must be designed, developed and supplied by the manufacturer specifically for the tool in use, and must be operated and maintained in accordance with the manufacturer's instructions related to minimizing dust emissions. The system must also be connected to the tool to be considered integrated. Integrated water delivery systems designed for blade cooling meet the requirements of Table 1, as these systems have been found to effectively suppress respirable dust.

Because the system must be supplied by the tool manufacturer, a water delivery system designed by the employer will not meet the requirements of Table 1, but may be used in accordance with paragraph D of the standard. In addition, an independent pressurized water sprayer operated by a second employee does not meet the requirements of an integrated water delivery system.