



Silica Exposure Control Program

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Contact:

Director of Risk Management – 541-956-7061

Legal References:

- **Oregon OSHA Respirable Crystalline Silica Standard, OAR 437-002-1053 through 437-002-1065**
- **Oregon OSHA, OAR 437 Division 2, Subdivision Z (Toxic and Hazardous Substances)**
- **Oregon OSHA Hazard Communication Standard, OAR 437-002-1910.1200**

Purpose

Rogue Community College (RCC) is committed to protecting employees from occupational exposure to respirable crystalline silica and preventing silica-related illnesses, including silicosis, lung cancer, and other respiratory diseases.

This program establishes requirements to identify, evaluate, and control employee exposure to respirable crystalline silica in accordance with applicable Oregon OSHA standards.

Scope and Application

This Silica Exposure Control Program applies to RCC employees whose work activities may result in exposure to respirable crystalline silica.

Written Exposure Control Plan

This document serves as RCC's Written Exposure Control Plan for respirable crystalline silica.

RCC will:

- Identify tasks that involve potential exposure to respirable crystalline silica
- Implement engineering controls, work practices, and respiratory protection to limit exposure
- Restrict housekeeping practices that may increase exposure



- Review and update this plan at least annually and whenever workplace conditions change

Departments covered under this program will follow the requirements outlined in this program and any task-specific procedures developed in coordination with Risk Management.

Approval and Permitting Requirement

All work activities that may generate or expose employees to respirable crystalline silica must be reviewed and approved by Risk Management prior to initiation.

RCC uses the Campus Optics online permitting system to manage this process.

- No silica-related work may begin without an approved permit
- Requests must be submitted through Campus Optics prior to work
- Risk Management will evaluate the task, materials, equipment being used, exposure potential, and required engineering controls, work practices, and PPE
- Work may only proceed after approval is issued

Standard Practices

All silica-generating tasks must be evaluated prior to work. Risk Management utilizes the performance option as defined under OAR 437-002-1055 to assess employee exposure using objective data, task-based assessments, and air monitoring as necessary to accurately characterize exposure levels. RCC uses Table 1 as a starting point for control selection and validates effectiveness as necessary through exposure assessment under the performance option.

- **Action Level: 25 $\mu\text{g}/\text{m}^3$ (8-hour TWA)**
- **Permissible Exposure Limit (PEL): 50 $\mu\text{g}/\text{m}^3$ (8-hour TWA)**

Employees must follow all required controls, PPE requirements, and safe work practices.

Exposure Assessment

RCC uses objective data and task-based evaluations collected or compiled by Risk Management or an outside entity to assess employee exposure to respirable crystalline silica.

Reassessment will occur when:



- Processes change
- New materials are introduced
- Controls are modified
- Work conditions change

Employees will be notified in writing by Risk Management of exposure monitoring results within 15 working days of receipt. If exposures exceed the permissible exposure limit (PEL), the notification will include a description of corrective actions being taken.

Exposure assessment data, including objective data, task-based evaluations, and air monitoring results, will be maintained by Risk Management.

Supervisors may request access to relevant exposure assessment data for planning and hazard evaluation purposes.

Exposure data will be used to support permitting decisions, selection of control measures, and ongoing program evaluation.

Engineering and Work Practice Controls

Engineering Controls

- Local exhaust ventilation
- HEPA-filtered dust collection systems
- Wet cutting, drilling, and suppression methods
- Enclosures or isolation

Task-specific control requirements for common silica-generating activities are provided in Appendix A.

Work Practice Controls

- Use wet methods whenever feasible
- Avoid dry sweeping and dry brushing
- Use HEPA vacuums for cleanup
- Limit personnel exposure
- Position workers to minimize dust inhalation

Personal Protective Equipment (PPE) and Respiratory Protection



Respiratory Protection

Respiratory protection will be used in accordance with the RCC Respiratory Protection Program and applicable Oregon OSHA requirements.

Respirators shall be required when:

- Engineering and work practice controls are not sufficient to maintain employee exposure at or below the Permissible Exposure Limit (PEL) of 50 $\mu\text{g}/\text{m}^3$ (8-hour TWA)
- Exposure assessments indicate that employee exposure exceeds or can reasonably be expected to exceed the PEL
- Specified by task-based control requirements or permitting conditions
- During interim periods while engineering controls are being implemented

Respirator selection will be based on anticipated exposure levels and Assigned Protection Factors (APFs) in accordance with Oregon OSHA requirements.

Use of respirators shall not be based solely on the visible presence or absence of dust.

All respirator use will comply with the RCC Respiratory Protection Program, including:

- Medical evaluations prior to use
- Fit testing for tight-fitting respirators
- Training on proper use, limitations, and maintenance
- Procedures for cleaning, storage, and inspection

Where higher exposure levels are anticipated, higher levels of respiratory protection (e.g., elastomeric half-mask respirators with P100 filters, full-face respirators, or powered air-purifying respirators) will be required.

Regulated Areas

RCC will establish regulated areas where employee exposure to respirable crystalline silica may exceed the Permissible Exposure Limit (PEL), as determined by Risk Management.

Regulated areas will be established whenever employee exposure to respirable crystalline silica exceeds, or can reasonably be expected to exceed, the Permissible Exposure Limit (PEL) based on exposure assessment data.



The Director of Risk Management is responsible for evaluating exposure data (including air monitoring, objective data, and task-based assessments) and determining when regulated areas are required.

When established, regulated areas will:

- Be clearly demarcated with signage and/or physical barriers
- Restrict access to authorized personnel only
- Require appropriate respiratory protection and PPE

At the time of this program's implementation, no regulated areas have been formally designated. Risk Management will reassess this determination as new tasks, materials, or exposure data become available.

Prohibited Practices

The following are prohibited unless no feasible alternative exists and proper controls are in place:

- Dry sweeping or dry brushing
- Use of compressed air for cleaning without dust capture
- Uncontrolled cutting, grinding, or drilling of silica-containing materials

Housekeeping & Disposal

Housekeeping practices will comply with OAR 437-002-1061 requirements.

Dry sweeping and the use of compressed air for cleaning silica-containing dust are prohibited unless used in conjunction with ventilation systems that effectively capture dust.

Only trained and authorized personnel may clean silica-containing debris.

Where cleanup is required:

- Wet methods or HEPA-filtered vacuum systems must be used
- Collected dust, debris, slurry, and vacuum contents must be handled in a manner that minimizes re-exposure
- Waste materials should be placed in sealed containers or bags prior to disposal
- Disposal must follow applicable regulatory and facility requirements



Supervisors are responsible for ensuring proper housekeeping practices are followed and that appropriate equipment is available.

Medical Surveillance

RCC will provide medical surveillance in accordance with Oregon OSHA requirements.

Medical surveillance will be offered to employees who are exposed at or above the action level (25 $\mu\text{g}/\text{m}^3$ as an 8-hour TWA) for 30 or more days per year, or as otherwise required by regulation.

Medical surveillance will be provided:

- At no cost to the employee
- At a reasonable time and place
- By a licensed healthcare professional

Medical surveillance includes:

- Medical and work history
- Physical examination
- Any additional testing required by applicable standards

RCC will ensure that medical information is kept confidential and that written medical opinions are handled in accordance with regulatory requirements.

Materials and Equipment Review

Departments must coordinate with Risk Management before introducing new materials, tools, or processes that may generate silica dust.

Spill, Dust Release, and Emergency Response

In the event of uncontrolled silica dust:

- Stop working if safe
- Restrict access
- Notify supervisor and Risk Management
- Clean using approved methods only



Injury or Exposure Procedures

If exposure occurs:

- Leave the area if needed
- Notify supervisor
- Report to Risk Management
- Seek medical attention if necessary

Roles and Responsibilities

Employees

- Follow procedures and controls
- Use PPE properly
- Report hazards

Supervisors

- Ensure controls are implemented
- Verify training completion
- Stop unsafe work

Risk Management

The Director of Risk Management is designated as the competent person for the RCC Silica Exposure Control Program and is responsible for overall program oversight. The competent person is defined as an individual capable of identifying existing and foreseeable respirable crystalline silica hazards and who has the authority to take prompt corrective measures to eliminate or minimize those hazards.

The Director of Risk Management may designate qualified supervisors, managers, or other employees to act as competent persons for specific tasks or job sites.

Designees must have the knowledge and training necessary to identify respirable crystalline silica hazards and the authority to implement corrective actions.

Designees are responsible for conducting frequent and regular inspections of assigned work areas and ensuring required controls are implemented in accordance with this program.



The Director of Risk Management (or designee) will:

- Review and approve all silica-related work through Campus Optics prior to initiation
- Conduct frequent and regular inspections of job sites, materials, and work practices to ensure ongoing compliance with this program and applicable Oregon OSHA requirements
- Evaluate the effectiveness of engineering controls, work practices, and PPE
- Ensure corrective actions are implemented when deficiencies are identified
- Coordinate exposure assessments, air monitoring, and use of objective data
- Provide guidance to supervisors and departments on compliance with this program

Hazard Communication

Respirable crystalline silica hazards will be communicated in accordance with the Oregon OSHA Hazard Communication Standard (OAR 437-002-1910.1200).

RCC will ensure:

- Safety Data Sheets (SDS) for silica-containing materials are readily accessible to employees
- Containers of silica-containing materials are properly labeled
- Employees are informed of the presence of silica hazards in their work area
- Employees are trained on the health effects of silica exposure and protective measures
- Employees have the right to access information regarding hazardous chemicals and associated protective measures.

Training

Training will be provided:

- At initial assignment
- When new silica-related hazards, tasks, or procedures are introduced

Training will include:

- Health hazards of respirable crystalline silica
- Tasks and operations that may result in exposure
- Engineering controls and work practices used at RCC
- Proper use of wet methods and dust control systems
- Housekeeping requirements and prohibited practices



- Use and limitations of PPE and respiratory protection
- Regulated areas and access restrictions
- Medical surveillance requirements, where applicable
- Emergency procedures and incident reporting

RCC will ensure that training is presented in a manner that employees can understand.

Supervisors are responsible for verifying that employees understand the training and can apply required controls and safe work practices. Additional training will be provided if deficiencies in understanding or performance are identified.

Contractors

RCC will coordinate with contractors to prevent exposure to respirable crystalline silica.

RCC will:

- Inform contractors of known silica hazards in the work area
- Require coordination of silica-generating activities
- Restrict contractor work that may impact occupied areas
- Require implementation of appropriate dust control measures

Contractors must:

- Comply with all applicable Oregon OSHA silica standards
- Provide their silica exposure control procedures upon request
- Use appropriate engineering controls, work practices, and PPE
- Prevent migration of dust into occupied buildings or adjacent work areas

RCC reserves the right to stop contractor work that does not comply with silica safety requirements or that creates a hazard for employees, students, or the public.

Non-Routine Tasks

All silica-related tasks, including non-routine work, must be reviewed and approved in advance through Campus Optics. Additional task-specific controls may be required prior to approval.

Employees will be informed of:

- Hazards



- Required controls
- PPE requirements

Incident Investigation

All silica-related incidents and near misses will be reviewed to improve safety practices.

Record Retention

RCC will maintain records in accordance with Oregon OSHA requirements.

Records include:

- Exposure assessment and air monitoring data
- Objective data used to assess exposure
- Medical surveillance records
- Training records
- Incident and exposure reports

Retention requirements:

- Exposure: maintained for at least 30 years
- Medical records: maintained for employment plus 30 years
- Training records: maintained for at least 7 years

All records will be maintained by Risk Management and made available as required by regulation.

Questions

Director of Risk Management

541-956-7061

Program Review

This program will be reviewed annually and updated as needed.



Appendix A – Task-Based Silica Control Methods (OSHA Table 1 Adapted)

Rogue Community College (RCC) utilizes **Oregon OSHA Table 1 – Specified Exposure Control Methods** as a primary reference for identifying appropriate engineering controls, work practices, and respiratory protection for common silica-generating tasks.

[Oregon OSHA Table 1 – Specified Exposure Control Methods \(available through Oregon OSHA or maintained by Risk Management\)](#)

Table 1 provides task-specific requirements for equipment and activities such as cutting, drilling, grinding, and demolition involving silica-containing materials. These requirements include:

- Required **engineering controls** (e.g., water delivery systems, dust collection systems)
- Required **work practices**
- Required **respiratory protection**, including Assigned Protection Factors (APFs)
- Criteria for “**full and proper implementation**” of control methods

Use of Table 1 at RCC

Table 1 will be used by supervisors, project managers, and Risk Management as a **baseline for control selection** when planning silica-generating work.

When applying Table 1:

- Controls must be **fully and properly implemented**, including:
 - Adequate water flow for dust suppression
 - Functional and properly maintained dust collection systems
 - Equipment used in accordance with manufacturer instructions
- For tasks performed **indoors or in enclosed areas**, additional ventilation or respiratory protection may be required to prevent dust accumulation
- Where multiple tasks are performed during a shift, **total task duration** must be considered when determining respiratory protection requirements

RCC Performance Option Approach

RCC complies with the Oregon OSHA general industry silica standard using the **performance option**.

Table 1 is used as a **guidance tool**, but is not the sole method of compliance.

RCC will:

- Validate the effectiveness of controls using:
 - Objective data
 - Task-based exposure assessments
 - Air monitoring, when necessary
- Require additional controls or respiratory protection if:
 - Table 1 controls are not feasible or not fully implemented
 - Exposure levels are unknown or may exceed the PEL
- Ensure that employee exposures are maintained at or below the **Permissible Exposure Limit (PEL)**

When Table 1 Alone Is Not Sufficient

An exposure assessment will be required when:

- Tasks are not performed in accordance with Table 1
- Alternative methods or equipment are used
- Work conditions differ from those assumed in Table 1 (e.g., confined spaces, extended duration, unusual materials)
- There is reason to believe exposures may exceed the PEL

Appendix B – Ceramics Operations – Silica Control Requirements

Ceramics Operations – Silica Control Requirements

Ceramics operations involving clay, glaze materials, and kiln processes may generate respirable crystalline silica and require specific controls.

Engineering Controls

- Local exhaust ventilation will be used if required and where feasible, including at mixing, reclaim, and sanding areas
- General ventilation will be maintained to minimize airborne dust accumulation

Work Practices

- Dry clay handling will be minimized whenever feasible
- Wet methods will be used for reclaiming clay and cleaning surfaces
- Dry sweeping and compressed air cleaning are prohibited
- Clay scraps and dust will be cleaned using wet methods or HEPA-filtered vacuums only



- Materials will be handled in a manner that minimizes dust generation

Glaze and Material Handling

- Mixing of dry glaze materials will be performed in well-ventilated areas
- Employees will avoid creating airborne dust when handling powdered materials
- Unknown or unlabeled materials will be treated as potential silica hazards

Personal Protective Equipment (PPE)

- NIOSH-approved N95 filtering facepiece respirators or higher protection will be used when handling dry materials, mixing glazes, or reclaiming clay
- Additional PPE (gloves, eye protection) will be used as appropriate

Respiratory Protection and Exposure Determination

RCC will evaluate employee exposure to respirable crystalline silica in ceramics operations using objective data, task-based assessments, and/or air monitoring, as needed.

Until exposure assessment is completed, respirator use will be required as a precautionary measure based on the potential for airborne silica generation.

Respirator use will be designated as follows:

Mandatory Use:

Respirators will be required when exposure assessments indicate that exposures may exceed, or can reasonably be expected to exceed, the Permissible Exposure Limit (PEL), or when engineering and work practice controls are not sufficient to maintain exposures below the PEL.

Mandatory use will comply with all elements of the RCC Respiratory Protection Program.

Voluntary Use:

Respirator use may be permitted when exposures are below the PEL. Voluntary use will comply with applicable Oregon OSHA requirements, including providing employees with the information contained in Appendix D to OAR 437-002-1910.134.

RCC will update respirator requirements based on exposure assessment results and will prioritize engineering and work practice controls to minimize airborne dust generation.



Housekeeping

- Work areas will be cleaned regularly using wet methods or HEPA-filtered vacuuming
- Accumulated dust will not be allowed to build up on surfaces

Access and Authorization

- Only trained employees will perform high-dust tasks such as reclaim, glaze mixing, or cleanup of dry materials

Training

- Employees assigned to ceramics operations will receive task-specific training on silica hazards, control measures, and proper housekeeping practices

Ceramics Operations – Campus Optics Annual Permit Requirement

Ceramics operations that involve routine handling of clay, glaze materials, or other silica-containing materials will be managed through an **annual permit issued in the Campus Optics system**.

The annual permit will:

- Identify routine tasks conducted within the ceramics area, including clay handling, reclaim, glaze mixing, sanding, and cleanup
- Document applicable engineering controls, work practices, and required personal protective equipment
- Confirm that employees assigned to ceramics operations have received required silica hazard training
- Establish housekeeping requirements and cleaning methods specific to the ceramics work area

The annual permit will be reviewed and approved by Risk Management prior to the start of each academic year or when significant changes to materials, processes, or equipment occur.

Departments must submit updates for review when:

- New materials or glazes are introduced
- Processes or equipment change
- Work conditions that may affect silica exposure are modified



Non-routine or higher-risk tasks within ceramics operations, including renovation, demolition, or activities generating significant airborne dust outside normal operations, will require a **separate task-specific permit through Campus Optics** prior to work.

Risk Management reserves the right to suspend or modify the annual permit if unsafe conditions are observed or if required controls are not implemented.