

SILICA PROTECTION PROGRAM

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INTRODUCTION/VERSION

The purpose of this program is to ensure the protection of all employees from hazards associated with silica through the proper use of equipment and personal protective equipment (PPE). PPE is to be used only when engineering controls (e.g. enclosure or confinement of the operation, ventilation or substitution of less toxic materials) are not feasible. When tasks performed are outlined in Table 1 and the provisions of the table are met exactly, the standard is complied with. When silica-containing compounds are to be handled in any other task, or if Table 1 is not exactly followed, all requirements of this document shall be met.

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RESPONSIBILITIES

Michigan State University

Michigan State University shall provide the proper training, assessment, equipment, and PPE necessary to protect the health and safety of the employee. The University shall be responsible for the establishment and maintenance of a program for the protection of workers exposed to silica in accordance with Title 29, Code of Federal Regulations, OSHA 1910.1053 and OSHA 1926.1153; and The State of Michigan Department of Licensing and Regulatory Affairs Occupational Health Standards for General Industry Rule 1502 and Occupational Health Standards for Construction Rule 690.

Environmental Health & Safety

Environmental Health & Safety (EHS) is responsible for the development, documentation, and administration of the Michigan State University silica program. The Occupational Safety Officer shall serve as the Silica Program Administrator. EHS shall:

1. Develop a written standard operating procedure document.
2. Conduct exposure assessments.
3. Provide guidance to campus units for the selection and purchase of approved tools and equipment.
4. Provide training to silica containing materials handlers.
5. Provide a respiratory protection program for respirator wearers.
6. Maintain assessment and training records.
7. Evaluate the overall effectiveness of the silica program.

Olin Health Center

MSU Occupational Health at Olin Health Center shall be responsible for the development and implementation of the medical surveillance program for personnel identified as exposed to respirable crystalline silica (RCS) over the action level for at least 30 days in a year. This program includes medical and work history, baseline and periodic examinations, pulmonary function testing, chest X-ray, and reports to the individual and to the supervisor to identify those individuals who are impacted by exposure to silica. The program shall also include a provision for referral to a specialist as needed.

Departmental Units/Supervisors

The supervisor shall:

1. Identify and report job areas that may involve exposure to RCS.
2. Identify and report the personnel under their supervision required to receive training in working with silica.
3. Conduct work site inspections to review unit compliance with silica regulations.
4. Assure that employees receive retraining when the following situations occur:
 - a) Previous training is rendered obsolete by changes in the workplace or the equipment to be used.
 - b) Inadequacies in the employee's knowledge or use of tools and equipment indicate that the employee has not retained the requisite understanding or skill.
 - c) Any other situation arises in which retraining appears necessary to ensure safe handling of crystalline silica containing material.

Employees Exposed to Silica

The worker shall:

1. Complete the MSU silica training.
2. Use tools and equipment, including personal protective equipment in accordance with instructions and training received from supervisors and EHS.

3. Wear air sampling equipment as required.
4. Report any deficiencies or malfunctions of tools or equipment to a supervisor.
5. Conform to the silica handling guidelines provided by their supervisor and EHS.
6. Receive a physical as indicated by exposures.

SILICA EXPOSURE ASSESSMENT

The exposure of each employee who is or who may reasonably be expected to be exposed to RCS at or above the action level must be assessed in accordance with either the performance option or the scheduled monitoring option.

Performance Option

The employer shall assess the 8-hour TWA exposure for each employee on the basis of any combination of air monitoring data or objective data sufficient to accurately characterize employee exposures to respirable crystalline silica.

Scheduled Monitoring Option

1. Initial monitoring shall be done to assess the 8-hour TWA exposure for each employee on the basis of one or more personal breathing zone air samples that reflect the exposures of employees on each shift, for each job classification, in each work area. Where several employees perform the same task on the same shift, in the same work area, a representative fraction of the employees may be sampled. The employees expected to have the highest RCS exposure shall be tested in representative sampling.
2. If initial monitoring indicates exposures are below the action level, monitoring for those employees may be discontinued.
3. Where the most recent monitoring indicates the employee exposures are at or above the action level but below or at the PEL, that monitoring shall be repeated within six months of the most recent monitoring.
4. When the most recent monitoring indicates the employee exposures are above the PEL, that monitoring shall be repeated within three months of the most recent monitoring.
5. When the most recent non-initial monitoring indicates the exposures are below the action level, the monitoring shall be repeated within six months of the most recent monitoring until two consecutive measurements, taken 7 or more days apart, are below the action level. At this time, monitoring may be discontinued for those employees except as provided in the reassessment section below.

Reassessment of Exposures

Any change in process, procedure, control equipment, or personnel which could be expected to result in new or additional exposure or if there is any reason to believe there has been new or additional exposure which would be at or above the action level requires reassessment.

Methods of Sample Analysis

All samples shall be evaluated by an accredited laboratory which analyzes air samples for RCS in accordance with Appendix A.

Employee Notification of Assessment Results

1. Each affected employee shall be notified of the results of the assessment within five working days of the assessment. The notification shall be in writing to each affected employee or shall be posted in an appropriate location accessible to all affected employees.
2. If the exposure assessment indicates employee exposure is above the PEL, the written notification shall include the corrective action being taken to reduce employee exposure to or below the PEL.

Observation of Monitoring

1. Affected employees or their designated representatives shall have an opportunity to observe any monitoring of employee exposure to RCS.
2. The observer shall be supplied with any appropriate protective clothing and equipment at no cost. MSU shall ensure that the observer uses such clothing and equipment.

REGULATED AREAS

Establishment

Wherever an employee's exposure to airborne concentrations of RCS is, or can reasonably be expected to be, in excess of the PEL, a regulated area shall be established.

Demarcation

1. The regulated area shall be demarcated from the rest of the workplace in a manner that minimizes the number of employees exposed to RCS within the regulated area.
2. Signs shall be posted at all entrances to a regulated area which bear the legend specified in this standard.

Access

Access to regulated areas shall be limited to:

1. Authorized persons required by work duties to be in the regulated area;
2. Any person entering the area as a designated representative of employees for the purpose of exercising the right to observe monitoring procedures; and
3. Any person authorized by OSHA or the regulations issued under it to be in a regulated area.

Provision of Respirators

Each employee and employee's designated representative entering a regulated area shall be provided with an appropriate respirator and shall be required to use it.

METHODS OF COMPLIANCE

Engineering and Work Practice Controls

Engineering and work practice controls shall be used to reduce and maintain employee exposure to RCS to or below the PEL unless it can be demonstrated that such controls are not feasible. Whenever controls are not sufficient to reduce employee exposure to or below the PEL, that use shall be supplemented with the use of respiratory protection in accordance with the Respiratory Protection Program.

Written Exposure Control Plan

1. For tasks not on Table 1, a written exposure control plan shall be established and maintained and contain at least:
 - a. A description of the tasks that involve exposure to RCS;
 - b. A description of the engineering controls, work practices, and respiratory protection used to limit employee exposure to RCS for each task; and
 - c. A description of the housekeeping measures used to limit employee exposure to RCS.
2. The written exposure control plan shall be reviewed at least annually for effectiveness and shall be updated as necessary.
3. The written exposure control plan shall be readily available for examination and copying.

Abrasive Blasting

Where abrasive blasting is conducted using RCS-containing blasting agents, or where abrasive blasting is conducted on substrates that contain crystalline silica, all other applicable MIOSHA standards shall be complied with.

RESPIRATORY PROTECTION

General

Where respiratory protection is required, each employee shall be provided an appropriate respirator. Respiratory protection is required:

1. Where specified in Table 1;
2. For tasks not listed in Table 1, or where the engineering controls, work practices, and respiratory protection described in Table 1 are not fully implemented;
 - a. Where exposures exceed the PEL during periods necessary to install or implement feasible engineering and work practice controls.
 - b. Where exposures exceed the PEL during tasks for which engineering and work practice controls are not feasible;
 - c. During tasks for which engineering and work practice controls and the controls are not sufficient to reduce exposures to or below the PEL; and
 - d. During periods when the employee is in a regulated area.

Respiratory Protection Program

Where respirators are required, all conditions of the Respiratory Protection Program shall be fulfilled.

Specified Exposure Control Methods

For tasks listed in Table 1, full and proper implementation of the engineering controls, work practices, and respiratory protection described in Table 1 meets the requirements of the standard with respect to RCS.

HOUSEKEEPING

Dry Cleaning Methods

Dry sweeping and dry brushing shall not be used where it could contribute to employee exposure to RCS unless wet sweeping, HEPA-filtered vacuuming or other methods that minimize the likelihood of exposure are not feasible.

Compressed Air

Compressed air shall not be used to clean clothing or surfaces where it could contribute to employee exposure to RCS unless:

1. The compressed air is used with a ventilation system that captures the dust cloud; or
2. No alternative method is feasible.

MEDICAL SURVEILLANCE

General

1. Medical surveillance shall be available for each employee who will be exposed to RCS at or above the action level for 30 or more days per year.
2. All medical examinations and procedures shall be performed by a physician or other licensed health care professional (PLHCP).

Initial Examination

An initial (baseline) medical examination within 30 days after initial assignment shall be available, unless the employee has had an examination meeting the requirements within the last 3 years. The examination shall consist of:

1. A Medical and work history, with emphasis on: past, present, and anticipated exposure to RCS, dust, and other agents affecting the respiratory system, any history of respiratory system dysfunction, including signs and symptoms of respiratory disease, history of tuberculosis, and smoking status and history;
2. A physical examination with special emphasis on the respiratory system;
3. A chest X-ray interpreted and classified by a NIOSH certified B Reader.
4. A pulmonary function test to include forced vital capacity and forced expiratory volume in one second and the vital/expiratory ratio, administered by a spirometry technician with a current certificate from a NIOSH approved spirometry course.
5. Testing for latent tuberculosis infection; and
6. Any other tests deemed appropriate by the PLHCP.

Periodic Examinations

Medical examinations shall be available at least every 3 years, or more frequently if recommended by the PLHCP.

Information Provided to the PLHCP

The employer shall provide the PLHCP with the following information:

1. A description of the employee's former, current, and anticipated duties as they relate to the employee's occupational exposure to RCS;
2. The employee's former, current, and anticipated levels of occupational exposure to RCS;
3. A description of any PPE used or to be used by the employee, including when and for how long the employee has used or will use that equipment; and
4. Information from records of employment-related medical examinations previously provided to the employee and currently within the control of the employer.

PLHCP's Written Report for the Employee

The employer shall ensure that the PLHCP explains to the employee the results of the medical examination and provides each employee with a written medical report within 30 days of each medical examination performed. The written report shall contain:

1. A statement indicating the results of the medical examination, including any medical condition(s) that would place the employee at increased risk of material impairment to health from exposure to RCS and any medical conditions that require further evaluation or treatment;
2. Any recommended limitations on the employee's use of respirators;
3. Any recommended limitations on the employee's exposure to RCS; and
4. A statement that the employee should be examined by a specialist if the chest X-ray is classified as 1/0 or higher by the B Reader, or if referral to a specialist is otherwise deemed appropriate by the PLHCP.

PLHCP's Written Medical Opinion For the Employer

1. The employer shall obtain a written medical opinion for the PLHCP within 30 days of the medical examination. The written opinion shall contain only the following:
 - a. The date of the examination;
 - b. A statement that the examination has met the requirements of this section; and
 - c. Any recommended limitations on the employee's use of respirators.
2. If the employee provides written authorization, the written opinion shall also contain either or both of the following:
 - a. Any recommended limitations on the employee's exposure to RCS;
 - b. A statement that the employee should be examined by a specialist due to the chest X-ray being classified as 1/0 or higher, or if referral is otherwise deemed appropriate by the PLHCP.
3. The employer shall ensure that each employee receives a copy of the written medical opinion for the employer within 30 days of each medical examination performed.

Additional Examinations

1. If the PLHCP's written medical opinion indicates that an employee should be examined by a specialist, the employer shall make available a medical examination by a specialist within 30 days after receiving the PLHCP's written opinion.
2. The employer shall ensure that the examining specialist is provided with all of the information that the employer is obligated to provide to the PLHCP.
3. The employer shall ensure that the specialist explains to the employee the results of the medical examination and provides each employee with a written medical report within 30 days of the examination. The written report shall contain all the components required of the PLHCP in the initial report.
4. The employer shall obtain a written report from the specialist within 30 days of the medical examination. The written opinion shall meet the requirement of the opinion from the PLHCP.

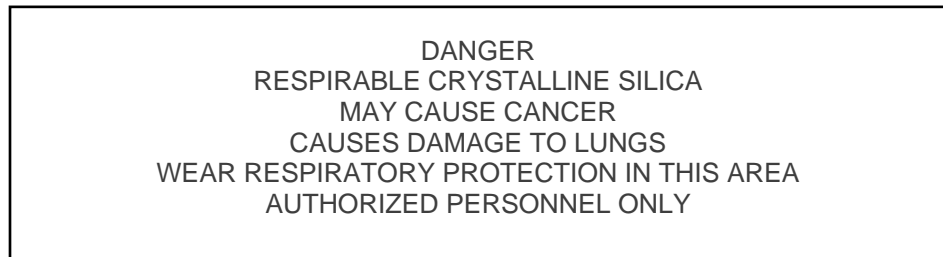
COMMUNICATION OF RESPIRABLE CRYSTALLINE SILICA HAZARDS TO EMPLOYEES

Hazard Communication

The employer shall include RCS in the program established to comply with the hazard communication standard. The employer shall ensure that each employee has access to labels on containers of crystalline silica and safety data sheets, and is properly trained.

Signs

The employer shall post signs at all entrances to regulated areas that bear the following legend:



Employee Information and Training

1. The employer shall ensure that each employee covered by the standard can demonstrate knowledge and understanding of at least the following:
 - a. The health hazards associated with exposure to RCS;
 - b. Specific tasks in the workplace that could result in exposure to RCS;
 - c. Specific measures the employer has implemented to protect employees from exposure to RCS, including engineering controls, work practices, and respirators to be used;
 - d. The contents of the standard; and
 - e. The purpose and a description of the medical surveillance program.
2. The employer shall make a copy of the standard readily available without cost to each employee covered.

RECORDKEEPING

Air Monitoring Data

1. The employer shall make and maintain an accurate record of all exposure measurements taken to assess employee exposure to RCS.
2. The record shall include at least the following information:
 - a. The date of measurement for each sample taken;
 - b. The task monitored;
 - c. Sampling and analytical methods used;
 - d. Number, duration, and results of samples taken;
 - e. Identity of the laboratory that performed the analysis;
 - f. Type of PPE, such as respirators, worn by the employees monitored; and
 - g. Name, social security number, and job classification of all employees represented
3. The employer shall ensure that exposure records are maintained and made available in accordance with 29 CFR 1910.1020.

Objective Data

1. The employer shall make and maintain an accurate record of all objective data relied upon to comply with this standard
2. The record shall include at least the following information:
 - a. The crystalline silica-containing material in question;
 - b. The source of the objective data;
 - c. The testing protocol and results of testing;
 - d. A description of the process, task, activity on which the objective data were based; and
 - e. Other data relevant to the process, task, activity, material, or exposures on which the objective data were based.
3. The employer shall ensure that objective data are maintained and made available in accordance with 29 CFR 1910.1020.

Medical Surveillance

1. The employer shall make and maintain an accurate record for each employee covered by medical surveillance.
2. The record shall include the following information about the employee:
 - a. Name and social security number;
 - b. A copy of the PLHCPs' and specialists' written medical opinions; and
 - c. A copy of the information provided to the PLHCPs and specialists.
3. The employer shall ensure that medical records are maintained and made available in accordance with 29 CFR 1910-1020.

DEFINITIONS

Action Level – a concentration of airborne respirable crystalline silica of 25 µg/m³ calculated as an 8-hour TWA.

Competent Person – An individual who is capable of identifying existing and foreseeable respirable crystalline silica hazards in the workplace and has the authorization to take prompt corrective measures to eliminate or minimize them. The competent person must have the knowledge and ability necessary to complete a written exposure control plan.

Employee Exposure – The exposure to airborne respirable crystalline silica that would occur if the employee were not wearing a respirator.

High-efficiency Particulate Air (HEPA) Filter – a filter that is at least 99.97 percent efficient in removing mono-dispersed particles of 0.3 micrometers in diameter.

Objective Data - Information, such as air monitoring data from industry-wide surveys or calculations based on the composition of a substance, demonstrating employee exposure to respirable crystalline silica associated with a particular product or material or a specific process, task, or activity. The data must reflect workplace conditions closely resembling or with a higher exposure potential than the processes, types of material, control methods, work practices, and environmental conditions in the employer's current operations.

Physician or Other Licensed Health Care Professional (PLHCP) - An individual whose legally permitted scope of practice, such as license, registration, or certification, allows him or her to independently provide or be delegated the responsibility to provide some or all of the particular health care services required by 1926.1153(h).

Respirable Crystalline Silica (RCS) - quartz, cristobalite, and/or tridymite contained in airborne particles that are determined to be respirable by a sampling device designed to meet the characteristics for respirable-particle-size-selective samplers specified in the International Organization for Standardization (ISO) 7708:1995: Air Quality—Particle Size Fraction Definitions for Health-Related Sampling.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS

For each employee engaged in a task identified here, full and proper implementation of the engineering controls, work practices, and respiratory protection specified for the task is required. If there is any deviation, the assessment and precautions of this program must be implemented.

Specified Exposure Control Methods when Working with Materials Containing Crystalline Silica			
Equipment/Task	Engineering and Work Practice Control Methods	Required Respiratory Protection and Minimum Assigned Protection Factor (APF)	
		≤4 hours/shift	>4 hours/shift
(i) Stationary masonry saws	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
(ii) Handheld power saws (any blade diameter)	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.		
	- When used outdoors.	None	APF 10
	- When used indoors or in an enclosed area.	APF 10	APF 10
(iii) Handheld power saws for cutting fiber-cement board (with blade diameter of 8 inches or less)	For tasks performed outdoors only: Use saw equipped with commercially available dust collection systems. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emission. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency.	None	None
(iv) Walk-behind saws	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.		

	- When used outdoors.	None	None
	- When used indoors or in an enclosed area.	APF 10	APF 10
(v) Drivable saws	For tasks performed outdoors only: Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
(vi) Rig-mounted core saws or drills	Use tool equipped with integrated water delivery system that supplies water to the cutting surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
(vii) Handheld and stand-mounted drills (including impact and rotary hammer drills)	Use drill equipped with commercially available shroud or cowl with dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. Use a HEPA-filtered vacuum when cleaning holes.	None	None
(viii) Dowel drilling rigs for concrete	For tasks performed outdoors only: Use shroud around drill bit with a dust collection system. Dust collector must have a filter with 99% or greater efficiency and a filter-cleaning mechanism. Use a HEPA-filtered vacuum when cleaning holes.	APF 10	APF 10
(ix) Vehicle-mounted drilling rigs for rock and concrete	Use dust collection system with close capture hood or shroud around drill bit with a low-flow water spray to wet the dust at the discharge point from the dust collector.	None	None
	Operate from within an enclosed cab and use water for dust suppression on drill bit.	None	None
(x) Jackhammers and handheld powered chipping tools	Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact.		

	- When used outdoors.	None	APF 10
	- When used indoors or in an enclosed area.	APF 10	APF 10
	Use tool equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism.		
	- When used outdoors.	None	APF 10
	- When used indoors or in an enclosed area.	APF 10	APF 10
(xi) Handheld grinders for mortar removal (i.e. tuckpointing)	Use grinder equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.	APF 10	APF 25
(xii) Handheld grinders for uses other than mortar removal	For tasks performed outdoors only: Use grinder equipped with integrated water delivery system that continuously feed water to the grinding surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
	Use grinder equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.		

	- When used outdoors.	None	None
	- When used indoors or in an enclosed area.	None	APF 10
(xiii) Walk-behind milling machines and floor grinders.	Use machine equipped with integrated water delivery system that continuously feeds water to the cutting surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	None	None
	Use machine equipped with dust collection system recommended by the manufacturer. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. When used indoors or in an enclosed area, use a HEPA-filtered vacuum to remove loose dust in between passes.	None	None
(xiv) Small drivable milling machines (less than half-lane)	Use a machine equipped with supplemental water sprays designed to suppress dust. Water must be combined with a surfactant. Operate and maintain machine to minimize dust emissions.	None	None
(xv) Large drivable milling machines (half-lane and larger)	For cuts of any depth on asphalt only: Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. Operate and maintain machine to minimize dust emissions.	None	None
	For cuts of four inches in depth or less on any substrate: Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. Operate and maintain machine to minimize dust emissions.	None	None

	<p>For cuts of four inches in depth or less on any substrate:</p> <p>Use a machine equipped with supplemental water spray designed to suppress dust. Water must be combined with a surfactant.</p> <p>Operate and maintain machine to minimize dust emissions.</p>	None	None
(xvi) Crushing machines	<p>Use equipment designed to deliver water spray or mist for dust suppression at crusher and other points where dust is generated. (e.g. hoppers, conveyors, sieves/sizing or vibrating components, and discharge points)</p> <p>Operate and maintain machine in accordance with manufacturer's instructions to minimize dust emissions.</p> <p>Use a ventilated booth that provides fresh, climate-controlled air to the operator, or a remote-control station.</p>	None	None
(xvii) Heavy equipment and utility vehicles used to abrade or fracture silica-containing materials (e.g. hoe-ramming, rock ripping) or used during demolition activities involving silica-containing materials	Operate equipment from within an enclosed cab.	None	None
	When employees outside of the cab are engaged in the task, apply water and/or dust suppressants as necessary to minimize dust emissions.	None	None
(xviii) Heavy equipment and utility vehicles for tasks such as grading and excavating but not including: demolishing, abrading, or fracturing silica-containing materials.	Apply water and/or dust suppressants as necessary to minimize dust emissions.	None	None
	When the equipment operator is the only employee engaged in the task, operate equipment from within an enclosed cab.	None	None

APPENDIX A: OSHA METHODS OF SAMPLE ANALYSIS

See: <https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.1153AppA>

APPENDIX B: OSHA MEDICAL SURVEILLANCE RESOURCES

OSHA Medical Surveillance

The purpose of this Appendix is to provide medical information and recommendations to aid physicians and other licensed health care professionals (PLHCPs) regarding compliance with the medical surveillance provisions of the respirable crystalline silica standard (29 CFR 1926.1153)

See <https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.1153AppB>

Forms

Written Medical Report for Employee

See <https://www.osha.gov/silica/AppendixBtosect1926.1153.pdf>, page 28

Written Medical Opinion for Employer

See <https://www.osha.gov/silica/AppendixBtosect1926.1153.pdf>, page 29

Authorization for Crystalline Silica Opinion to Employer

See <https://www.osha.gov/silica/AppendixBtosect1926.1153.pdf>, page 30

APPENDIX C: TEMPLATE FOR WRITTEN SILICA EXPOSURE CONTROL PLAN

See: https://www.michigan.gov/documents/lara/lara_miosha_sample_silica_plan_554248_7.doc