



## Oregon Occupational Safety & Health Division Technical Guidance

**DATE:** April 14, 2017

**TO:** All Oregon OSHA Staff

**FROM:** Trena VanDeHey, Standards & Appeals Manager

**SUBJECT:** Division 2, Subdivision Z-Silica, 437-002-1061 Housekeeping.

**Question:** Is using a dry sweeping compound affected by the rule's prohibition of dry sweeping?

**Discussion:** A sweeping compound is material that is used to clean floors and reduce the amount of dust created during sweeping. Many of these compounds include silica, so one question is whether the rule would prohibit the use of a sweeping compound that contains silica. Another related issue is if an employer can use a sweeping compound to clean up silica-containing debris. The rule language in question states; "Do not allow dry sweeping or dry brushing where such activity could contribute to employee exposure to respirable crystalline silica unless wet sweeping, HEPA-filtered vacuuming, or other methods that minimize the likelihood of exposure are not feasible."

**Answer:** The use of a dry sweeping compound does not in and of itself violate the rule because the particle size of the sweeping compound is typically larger than the particle size of concern, unless there is some activity that would fracture the particles.

On the other hand, when there is silica-containing debris, dry sweeping is still prohibited unless other methods, such as wet sweeping or HEPA vacuuming are not feasible. When other methods are not feasible and dry sweeping is the only cleaning method that can be used, there is no prohibition on using a dry sweeping compound, but the initial exposure assessment must include this activity to determine employee exposure levels to silica.

**History:** TG 2017-1 Issued 4-14-2017