OSHA Silica Rule (29 CFR 1926.1153)
Compliance Instructions

Silica Rule Objective Test Data – Dual Dustless Wet+Dry/HEPA Wet+Dry Compliance with Table 1 Airflow Requirements:

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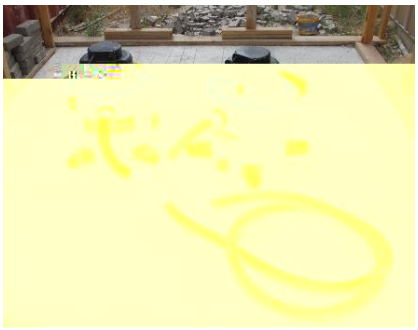

Vacuums Used for Airflow Comparison

1 each Dustless Technologies Dust Droid 300 (rated at 300 CFM)

Ermator S26™ Dust Collector (rated at 258 CFM)

Measurements

Dual HEPA/Wet+Dry with 1 ½-inch hose: 100 CFM

Dual HEPA/Wet+Dry with 2-inch hose: 120 CFM

Dust Droid 300: 138 CFM

Ermator S26: 119 CFM

Dustless®

From: osha_ecorrespondence@dol.gov
Sent: Thursday, September 14, 2017 11:06 AM
To: Brent Willson
Subject: Answer From ASK OSHA

*** PLEASE DO NOT SELECT "REPLY" ***
THIS EMAIL HAS BEEN ROUTED TO YOU THROUGH AN AUTOMATED FEDERAL OSHA SYSTEM.
PLEASE REFER TO THE INFORMATION BELOW.

Disclaimer

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Topic & Question

Topic: Other

Thank you for your
response to my question (serial #44686302). Unfortunately, you did not answer the question I asked, but rather one I asked and received a response to almost a year ago. Again, my question involves whether under OSHA's Silica Rule, whether two 130 CFM vacuums connected with a y-connector could be used in place of a 260 CFM vacuum to meet the requirement in Table 1, items xi and xii for the dust collector to have 25 CFM per inch of grinding wheel diameter. As stated in previous queries, Ms. Patricia Downs had submitted this question for me to the Directorate for Enforcement Programs, but thus far we have not received a response. I have put together objective data showing that airflow at the end of the hose is equivalent with the two-vacuum setup and the 260 CFM vacuum. I can
forward the documentation to you if needed. Thank you.

Submit Date: 30-AUG-17 08:35:24 AM

OSHA Response(s)

To answer your question, yes, two 130 cfm could be used. If the vacuums provide the required cfm, (i.e., 25 cfm per inch of wheel diameter), and have a cyclonic pre-separator or a filter cleaning mechanism, a vacuum dust collection system that uses two vacuums instead of one would comply with Table 1 for handheld grinders.

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