

OSHA Silica Rule (29 CFR 1926.1153) Compliance Instructions

D1603, D1606, 16006, 16003, D1618, D1619 Wet+Dry and HEPA Wet+Dry Vacuums

- The Dustless HEPA Wet+Dry Vac (D1606) with filter cleaning and Dustless Wet+Dry Vac (D1603, 16003) with filter cleaning both meet the OSHA Slica Rule (29 CFR 1926.1153) requirements for a dust extractor when used in accordance with Table 1 and tool manufacturer specifications.
- HEPA Wet+Dry owners should check to ensure your vacuum includes the filter-deaning weight. If not, contact Dustless Oustomer service at (800) 568-3949.

ays use a Dustless Wunderbag for dry pickup to increase productivity, reduce the frequency of filter-cleaning cycles, and to prolong filter life.



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

Summary: OSHA's Slica Rule, Table 1, xi and xii requires a dust collector rating of 25 cubic feet per minute (CFM) for every inch of grinding wheel diameter. Whereas single-motor dust collectors usually produce less than 150 CFM, they cannot be used for greater than a six inch grinding wheel. Dustless Technologies performed testing to compare the end-of-the-hose CFM of two of its Wet+Dry or HEPA Wet+Dry vacuums tethered together using a Y-connector feeding into a single hose and compared the results to the measurements for 2-motor vacuums rated at greater than 250 CFM. The results were provided to OSHA.

Test data below shows the twosame 2-

over 250. According to Table 1, these vacuums are capable of operating with a 10-inch wheel or less. This test data objectively shows this dual Dustless Wet+Dry configuration is similarly capable. OSHA has confirmed the dual-vacuum configuration complies with Table 1 requirements (see attachment).

References: OSHA 29 CFR §1926.1153, Final Rule to Protect Workers from Exposure to Respirable Crystalline Slica (Slica Rule) (Construction Standard)

- Paragraph (c) Specified exposure control methods, Table 1,
 - o xi Hand-held grinders for mortar removal (i.e., tuckpointing)
 - o xii Hand-held grinders for uses other than mortar removal

Measurement Equipment: Airflow Meter

- Brand: Mannix Testing and Measurement
- Model: 8901 CFM Master with 3-inch to 2 1/4-inch hose adapter (to ensure repeatable measurements)



Vacuums Being Tested

- 1 each Dustless Technologies HEPA Wet+Dry Vac and 1 each Dustless Wet+Dry Vac connected with 2 each
- 12-inch x 1 ½-inch inner diameter (ID) hoses through a 3-way Y-Connector to both a 12 ½-foot 2-inch and a 12
- ½ foot 1½ inch ID hose. Each vacuum is rated at 130 CFM, total system rating is 260 CFM.

<u>Dustless</u>





<u>Vacuums Used for Airflow Comparison</u> 1 each Dustless Technologies Dust Droid 300 (rated at 300 CFM)

258 CFM)



Ermator S26™ Dust Collector (rated at

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Measurements

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





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



Ermator S26: 119 CFM





Attachment

 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

Responses to the Electronic Mail Forms are for informational purposes only, and do not constitute an official communication of the U.S. Department of Labor or OSHA. For an official response, please submit your inquiry in writing.

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 OSHAGapos;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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