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## TRI Testifies on OSHA's Proposed Crystalline Silica Rule

Washington, D.C. – The Tile Roofing Institute's (TRI) President, Richard Olson provided formal testimony on April 2 at the U.S. Department of Labor on the Occupational Safety and Health Administration's (OSHA) proposed rule to amend its existing standards for occupational exposure to respirable crystalline silica. The TRI asked that the rule be withdrawn and, if not, that an exception from the rule be granted for the unique nature of steep slope roofing. Olson explained that Cal-OSHA and Arizona-OSHA have such exceptions in place. Potential exposures when installing roof tile can occur during the limited cutting for valleys and roof penetrations.

*“The roofing community has been diligently working on improving best practices in the field that address both the engineering and safety concerns unique to steep slope applications.”*  
said Richard Olson, TRI President.



For roofing, proposed engineering controls would require either a wetting or vacuuming saw for cutting, creating additional fall hazards from hoses and/or balance issues from heavier and awkward saws with vacuum containers. In the case of wet saws, introducing water onto steep, uneven surfaces greatly increases the risk of slips and falls. “Falls account for 76% of the fatalities in roofing construction and numbered 668 in 2012. We are not aware of any reported silicosis deaths from the cutting of roof tiles,” Olson continued.

Olson went on to provide testimony with installation pictures and current costs to explain why the new proposed one-size-fits-all rule won't work for steep-slope roofing and will dramatically increase the risk from falls, which the roofing industry and OSHA have prioritized for the last decade making significant progress. In addition, the rule will impose a disproportionate financial hardship on smaller roofing companies.

“We have reduced dust exposure since 2006 by working collectively with NIOSH, state OSHAs and roofing contractors to develop best practices,” said Olson. He continued to explain, “The TRI also is working with various equipment manufacturers to help engineer out dust exposure, but to date have not found a viable option that will work on all profiles of tile and be consistent with fall protection priorities.”

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*The TRI represents industry professionals involved in the manufacturing and installation of concrete and clay tile roofs in the U.S. and Canada, and works with national, state, and local building officials including roofing contractors to develop installation techniques, codes, and standards for better roofing systems. Olson can be reached at [rolson@tileroofing.org](mailto:rolson@tileroofing.org). Visit [www.tileroofing.org](http://www.tileroofing.org) to learn more about the TRI*