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# MIOSHA

Michigan Occupational Safety and Health Administration (MIOSHA)  
Department of Labor and Economic Opportunity (LEO)

# AGENCY INSTRUCTION

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DOCUMENT IDENTIFIER:  
MIOSHA-COM-20-5R4

DATE:  
January 20, 2026

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**SUBJECT: Silica – State Emphasis Program (SEP)**

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- I. Purpose. This instruction establishes a state emphasis program (SEP) to reduce employee exposures to respirable crystalline silica (RCS) and to prevent silicosis.
- II. Scope. This instruction applies to the Construction Safety and Health Division (CSHD), Consultation Education and Training (CET) Division, the General Industry Safety and Health Division (GISHD), and Technical Services Division (TSD).
- III. References.
  - A. Agency Instruction MIOSHA-COM-05-2, [Abatement Assurance and Follow-up Inspection Procedures](#), as amended.
  - B. Agency Instruction MIOSHA-COM-13-1, Dual, One-MIOSHA, Intra-Office Assistance, and Transfer of Inspections/Investigations, as amended.
  - C. Agency Instruction MIOSHA-COM-20-1, Companion and Expanded Inspections, as amended.
  - D. Construction Standard [Part 690, Silica in Construction](#) (Part 690).
  - E. Division Instruction CSHD-COM-09-1, [Construction Inspection Targeting](#), as amended.
  - F. Executive Office of the President, Office of Management and Budget, [North American Industry Classification System \(NAICS\) Manual](#), as amended.
  - G. General Industry Standard [Part 590, Silica In General Industry](#) (Part 590).
  - H. General Industry System for Programmed Inspections, November 2019.
  - I. Michigan Department of Labor and Economic Opportunity, MIOSHA Standards topics webpage [Silica](#).
  - J. Michigan State University, [Recommended Medical Screening Protocol for Silica Exposed Workers](#).
  - K. MIOSHA [Field Operations Manual](#), as amended (FOM).
  - L. Occupational Safety and Health Administration Instruction CPL 02-02-080, June 25, 2020, [Inspection Procedures for the Respirable Crystalline Silica Standard](#).
  - M. Occupational Safety and Health Administration Instruction CPL 03-00-023, February 4, 2020, [National Emphasis Program \(NEP\) – Respirable Crystalline Silica](#).

- N. Occupational Safety and Health Administration, Occupational Exposure to Respirable Crystalline Silica, March 25, 2016, [Federal Register](#), vol. 81, no. 58, pp. 16286-16889.
- O. Occupational Safety and Health Administration Publication 3465, (2012), [Solutions for the Prevention of Musculoskeletal Injuries in Foundries](#).
- P. Occupational Safety and Health Administration, Standard Interpretations, [Respirable Crystalline Silica Focused Inspections in the Engineering Stone Fabrication and Installation Industries](#).
- IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.
- V. Cancellations. All previous versions of this agency instruction.
- VI. Next Review Date. This instruction will be reviewed one (1) year from date of issuance.
- VII. History. History of previous versions includes:
  - MIOSHA-COM-20-5R3, September 30, 2024
  - MIOSHA-COM-20-5R2, November 2, 2022
  - MIOSHA-COM-20-5R1, September 8, 2021
  - MIOSHA-COM-20-5, August 24, 2020
- VIII. Contact. [Dan W. Maki](#), CSHD Director; [Tarah M. Kile](#), CET Director; [Adrian Z. Rocskay](#), GISHD Director; and [Samantha Birsén](#), TSD Director
- IX. Originator. Barton G. Pickelman, Director
- X. Background. In 2016, the Federal Occupational Safety and Health Administration (OSHA) amended its standards for Respirable Crystalline Silica (RCS) based on research that showed that the old exposure limits for RCS did not adequately protect worker health. OSHA described the research in the Federal Register publication of the new occupational health standards. The new federal standards are 29 C.F.R. § 1910.1053, Respirable Crystalline Silica, for general industry and 29 C.F.R. § 1926.1153, Respirable Crystalline Silica, for construction. In the revised regulations, OSHA lowered the permissible exposure limit (PEL) from 100 µg/m<sup>3</sup> to 50 µg/m<sup>3</sup> in general industry and from 250 µg/m<sup>3</sup> to 50 µg/m<sup>3</sup> for construction and shipyards, and it issued expanded standards for the substance. The expanded standards added requirements for exposure assessment, control methods (construction only), regulated areas (general industry only), respiratory protection, housekeeping, a written exposure control plan, medical surveillance, communication of hazards to employees, and recordkeeping.  
  
MIOSHA adopted the federal standards for RCS in 2017, as Construction Standard Part 690, Silica in Construction, and General Industry Standard Part 590, Silica in General Industry. This agency instruction adopts the OSHA National Emphasis Program (NEP) for RCS, CPL 03-00-023, and the OSHA enforcement directive for respirable crystalline silica, CPL 02-02-080. The NEP has been adopted with modifications. In particular, the targeting system has been adapted to the type of silica-generating industries in this state and the type of industries in this state that cause confirmed cases of silicosis. When the

NEP references the OSHA Field Operations Manual and federal directives, the corresponding sections of the FOM and MIOSHA instructions will be followed.

From August 20, 2020, through November 20, 2020 (i.e., during the three months after the original issuance date of this instruction), programmed inspections under this SEP were not conducted due to a three-month enforcement delay, instituted to allow for initial outreach.

XI. Significant Changes.

- A. Updated inspection number targets. See Section XII. Enforcement Activities, C. Number of Inspections.
- B. Updated training and outreach language throughout this instruction.

XII. Enforcement Activities.

- A. All inspections under this SEP will be conducted by an industrial hygienist (IH).
- B. All inspections under this SEP will follow the OSHA enforcement directive for respirable crystalline silica, CPL 02-02-080.
- C. Number of Inspections. MIOSHA will attempt to conduct 74 inspections under this SEP in fiscal year (FY) 2026. This goal is based on the requirement in the OSHA NEP that each of its regions target RCS in at least two percent of its inspections every year. Two percent of the 3,723 inspections conducted by MIOSHA in FY 2025 was 74 inspections.
- D. Inspections will be considered to be part of the SEP and will be coded as such per section XVI of this instruction if their scope involves determining the employer's compliance with Part 690 or Part 590. They would include:
  - 1. Programmed inspection assignments issued under this SEP.
  - 2. Programmed inspection assignments for GISHD not issued under this SEP but encompassing RCS if air monitoring is conducted for RCS.
  - 3. Programmed inspections for CSHD that include construction activities involving RCS.
  - 4. Complaint inspections, referral inspections, and fatality inspections for RCS.
  - 5. Complaint inspections, referral inspections, and fatality inspections not originally assigned for RCS but expanded to include RCS if air monitoring is conducted for RCS. CSHD is not required to conduct air monitoring in these circumstances.
  - 6. Follow-up inspections for RCS.
  - 7. Any other inspections that involve air monitoring for RCS.

- E. Targeting.
  - 1. GISHD. GISHD will create a targeting list of employers based on the NAICS codes in [Appendix A](#) of this instruction. The primary industries targeted under the SEP will be NAICS codes 327120, 327320, 327390, 327991, 331511, 331524, and 423320.
  - 2. CSHD. CSHD will target worksites based on a review of the list of active construction projects downloaded monthly from the Dodge database (see Division Instruction, CSHD-COM-09-1, Construction Inspection Targeting, as amended), CSHD will target inspections based on IH and safety officer (SO) observations of construction projects that are viewed while traveling in their work areas. Also, CSHD may target inspections based on review of local building permits and government reports (e.g., lists of major road and bridge projects from the Michigan Department of Transportation website). During any inspection the SO/IH will determine if silica dust-generating activities are being performed. If so, the SO/IH will focus on those activities.
- F. Inclusion of RCS in Scope of Inspection. The IH shall evaluate the employer’s compliance with Part 590 and Part 690 on all programmed inspections assigned under this SEP; on all comprehensive health inspections; and on all unprogrammed activities (complaints, referrals, fatalities) alleging RCS hazards. In addition, if an IH discovers potential exposure to RCS during an inspection not originally assigned to examine RCS, the IH shall expand the investigation to address the RCS hazards using the procedures in Agency Instruction, MIOSHA-COM-20-1, Companion and Expanded Inspections, as amended. Per the FOM, if the inspection scope is partial, the IH must expand the scope to address any potentially serious hazard in plain view or discovered during the inspection process, including the RCS hazards. The IH will be observant for the sources of RCS hazards when encountering the industries and work processes listed and described in Appendices A and B of CPL 03-00-023 and Appendices F and G in CPL 02-02-080.
- G. If an SO discovers potential exposure to RCS, the SO will contact the appropriate health supervisor to make an Intra-Office Assistance (IOA) Request in accordance with Agency Instruction, MIOSHA-COM-13-1, Dual, One-MIOSHA, Intra-Office Assistance, and Transfer of Inspections/Investigations, as amended.
- H. Employer Resources. The IH will direct employers to MIOSHA’s topics webpage for Silica, where resources are available such as a MIOSHA fact sheet on silica, a silica training PowerPoint, and a sample written silica exposure control plan.
- I. Ergonomics. Since NAICS 331 (Primary Metal Manufacturing) is a high-hazard industry targeted under MIOSHA’s strategic plan for 2024-2028 due to its high injury and illness rates, mainly from ergonomic-related injuries and illnesses, the IH will address ergonomic hazards on NAICS 331 inspections and issue general duty clause citations or recommendations for ergonomic hazards as appropriate.

The IH may recommend employers utilize OSHA Publication 3465 (2012), Solutions for the Prevention of Musculoskeletal Injuries in Foundries as part of a workplace ergonomics program to reduce musculoskeletal disorders that are caused by repetitive motion or mechanical stress.

XIII. Follow-Up Inspections.

- A. If an employer covered by the general industry standard has not reduced RCS exposures to or below the PEL, or if an employer covered by the construction standard has not either fully or properly implemented required engineering controls, work practices, and respiratory protection for a task listed on Table 1 of Part 690 or reduced RCS exposures to or below the PEL, within the time period specified on the citation, then a follow-up inspection shall be conducted in accordance with the FOM and Agency Instruction, MIOSHA-COM-05-2, Abatement Assurance and Follow-up Inspection Procedures, as amended.
- B. Follow-up inspections should also be conducted if there are any unabated violations of other provisions of the standard.
- C. Rule 1349 citations should be issued if there are only unabated other-than-serious citations, per Agency Instruction, MIOSHA-COM-05-2, Abatement Assurance and Follow-up Inspection Procedures, as amended.
- D. For situations where follow-up inspections cannot be performed (for example, due to temporary, intermittent, or mobile operations), the enforcement divisions should, when possible, require the employer to provide written updates documenting the progress of abatement efforts.
- E. A follow-up inspection is not required when the enforcement division has specific knowledge and documentation indicating there are no workers exposed to RCS.

XIV. Coordination with Michigan State University's Department of Occupational and Environmental Medicine (MSU OEM).

- A. Where the IH suspects that cases of silicosis may not have been reported on the OSHA 300 log (i.e., suspected due to conversations with workers, history of RCS exposure over the PEL, and multiple long-term workers), and the misreading of a chest radiograph may have played a role, the IH will consider discussing the case with Dr. Rosenman of Michigan State University (MSU). Dr. Rosenman has offered to provide a free reading of the x-ray and B reader classification.
- B. For inspections conducted under the SEP, the IH will complete the form OH-48, Industrial Hygiene Summary for Silica. In CSHD, form OH-48 will only be completed for silica and other work-related lung disease investigations. A copy of the form can be found in [Appendix B](#).
- C. If exposure monitoring shows results above the limit of detection, or if recommended by MSU, the IH shall provide the employer with a copy of the MSU document, Recommended Medical Screening Protocol for Silica Exposed Workers, along with the inspection findings.

- D. Each quarter, TSD will send MSU OEM a copy of the Air Contaminant Data Sheets (form OH-451) for any RCS samples collected by MIOSHA and the Industrial Hygiene Summary for Silica (form OH-48) for any silica inspections that quarter.
- XV. Outreach. CET will continue to make the public aware of the SEP through social media as well as notifications in newsletters when updated.
- XVI. OSHA Information System (OIS) Coding.
- A. All enforcement inspections and compliance assistance interventions conducted under this SEP shall be coded as “RCS-NEP” under the National Emphasis Program field in OIS and as “SILICA” under the State Emphasis Program on the OIS Inspection tab on the Inspection Data subtab.
  - B. In enforcement, for all programmed inspections initiated using the targeting methods under this SEP, on the OIS Inspection Data tab/page, code “RCS-NEP” as the Primary Emphasis Program.
  - C. Whenever a consultation request/visit is made related to this SEP, the NEP code “RCS-NEP” shall be recorded in the appropriate field or “Silica SEP” selected on the Consultation request/visit forms.
  - D. RCS inspections shall no longer be coded in OIS field using the Additional Code “N-02 SILICA.”

**APPENDIX A**

**Targeted Industries in General Industry**

<b>NAICS CODE<sup>1</sup></b>	<b>Industry</b>	<b>Number of Establishments in Michigan<sup>3</sup></b>	<b>Number of Establishments in Michigan with More Than 10 Employees</b>
327110	Pottery, Ceramics, and Plumbing Fixture Manufacturing	1	1
327120	Clay Building Material and Refractories Manufacturing	15	15
327212	Other Pressed and Blown Glass and Glassware Manufacturing	4	4
327213	Glass Container Manufacturing	0	0
327320	Ready-Mix Concrete Manufacturing	79	79
327331	Concrete Block and Brick Manufacturing	9	9
327332	Concrete Pipe Manufacturing	7	7
327390	Other Concrete Product Manufacturing <sup>2</sup>	30	30
327991	Cut Stone and Stone Product Manufacturing <sup>2</sup>	14	14
327992	Ground or Treated Mineral and Earth Manufacturing	5	5
327993	Mineral Wool Manufacturing	5	5
327999	All Other Miscellaneous Nonmetallic Mineral Product Manufacturing	3	3
331511	Iron Foundries <sup>2</sup>	47	35
331512	Steel Investment Foundries	16	13
331513	Steel Foundries (except Investment)	23	9
331524	Aluminum Foundries (except Die-Casting)	28	13
423320	Brick, Stone, and Related Construction Material Merchant Wholesalers	167	120

<sup>1</sup>These NAICS had at least one establishment with an overexposure to RCS under the former PEL in the OSHA inspection history for the US.

<sup>2</sup>These NAICS had six or more establishments with an overexposure to RCS under the former PEL in the OSHA inspection history for the US.

<sup>3</sup>According to a publicly available database of companies in Michigan.

**APPENDIX B**

**Industrial Hygiene Summary for Silica (OH-48 Form)**

Michigan Department of Labor and Economic Opportunity  
Michigan Occupational Safety and Health Administration  
General Industry Safety and Health Division

I# \_\_\_\_\_

**INDUSTRIAL HYGIENE SUMMARY FOR SILICA INVESTIGATIONS**  
(Please Print)

**GENERAL INFORMATION**

1. Establishment Name: \_\_\_\_\_  
Worksite Street Address: \_\_\_\_\_  
City, ZIP Code: \_\_\_\_\_

**MEDICAL INFORMATION**

2. Number of workers exposed to silica: \_\_\_\_\_
3. Names of all workers on OSHA 300 log recorded as having silicosis for up to 5 years.
- | Name of Employee/Year of Log | Name of Employee/Year of Log |
|------------------------------|------------------------------|
| _____                        | _____                        |
| _____                        | _____                        |
| _____                        | _____                        |

4. Does the employer conduct a preplacement physical examination (circle answer)?      Yes      No  
If Yes, does it include [circle answer(s)]:
- |                                    |     |    |
|------------------------------------|-----|----|
| a. Chest X-Ray – NIOSH B Reader    | Yes | No |
| b. Chest X-Ray – No NIOSH B Reader | Yes | No |
| c. Pulmonary Function Test         | Yes | No |
| d. Low Back X-Rays                 | Yes | No |

Does the employer conduct periodic physical examinations (circle answer)      Yes      No  
If Yes, do they include [circle answer(s)]:

- |                                    | Yes | No | If YES,<br>Indicate frequency: |
|------------------------------------|-----|----|--------------------------------|
| a. Chest X-Ray – NIOSH B Reader    | Yes | No | _____                          |
| b. Chest X-Ray – No NIOSH B Reader | Yes | No | _____                          |
| c. Pulmonary Function Test         | Yes | No | _____                          |
| d. Low Back X-Rays                 | Yes | No | _____                          |

Additional comments on medical information: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**RESPIRATORS**

5. Indicate type of respirator worn (circle type). If it has a NIOSH approval number, please indicate. If more than one type is worn, specify the job titles of personnel using each type.

Type	NIOSH Approval Number (TC-XXX-XXX)	Job Title
Not Used	_____	_____
Single Use	_____	_____

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Particulate	_____	_____
High Efficiency	_____	_____
Other (specify)	_____	_____

WORK PRACTICES

6. Are tabletops, flat surfaces, and floors visibly dusty (circle answer)?

Beginning of sampling period?	Yes	No
End of sampling period?	Yes	No

7. How often does the company clean (circle answer)?

Daily	Weekly	Monthly	Other	Don't Know			
Do they dust? Yes	No	Sweep? Yes	No	Vacuum? Yes	No	Wet Mop? Yes	No

8. Did the breathing zone ever become visibly dusty during onsite visit? (approximate time)

\_\_\_\_\_ hours \_\_\_\_\_ minutes per \_\_\_\_\_ hour shift

9. Does employer state that work practices have changed within the last (circle answer):

Did not change    6 months    year    2 years    other

How have they changed? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

10. Do employees state that work practices have changed within the last (circle answer):

Did not change    6 months    year    2 years    other

How have they changed? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Additional comments concerning work practices: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

VENTILATION SYSTEM (circle answer)

11. Type:	Local Exhaust Ventilation	General	None
12. Is the ventilation system operational?	Inadequate	Adequate	Not Determined
13. How did you evaluate the system?	Smoke Tube	Velometer	Air Test Results Below PEL
	Other	_____	

AIR SAMPLING DATA FOR SILICA

14. Please inquire whether air samples for silica have been collected previously by MIOSHA or by others. Attach a copy of the results.

Sampling Date(s) \_\_\_\_\_ By Whom \_\_\_\_\_

TEMPORARY EMPLOYMENT

15. Does the employer have temporary employees (circle answer)?      Yes      No

If Yes:

What percent of the workforce are the temporary employees? \_\_\_\_\_

Who provides the temporary workers mandatory training for (circle answer):

Hazard Communication	Temp Agency	Host Employer	Both	N/A
MIOSHA Rights and Responsibilities	Temp Agency	Host Employer	Both	N/A
Lock Out/Tag Out	Temp Agency	Host Employer	Both	N/A
Other, specify _____	Temp Agency	Host Employer	Both	N/A

Who provides the temporary employees with PPE?

Temp Agency – list type(s) \_\_\_\_\_

Host Employer – list type(s) \_\_\_\_\_

Both – list type(s) \_\_\_\_\_

Neither (indicate if N/A or needed but not provided) \_\_\_\_\_

Do the temporary employees receive medical care from the same location as regular employees?      Yes      No

Notes: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

PROGRAM ASSESSMENT

16. What changes would you recommend in this workplace so that employees do not develop silicosis?

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

MIOSHA Staff Collecting Information \_\_\_\_\_

IH/District Phone Number \_\_\_\_\_ Date \_\_\_\_\_