

## Stone benchtop campaign (stage 2) audit tool

This audit tool addresses the respirable crystalline silica component (RCS) component of the stone benchtop campaign commencing in September 2018.

The audit tool gives specific guidance on six areas of audit that are to be undertaken at assigned workplaces.

The areas are:

1. Prohibition of dry cutting
2. Minimising risk of exposure to RCS
3. Health monitoring
4. Respiratory protective equipment
5. Information for workers
6. Consultation with workers

Each area must be addressed at each assigned workplace.

### **Enforcement action**

Workplaces targeted for the campaign have already received educative material.

This is a compliance campaign. **Where activities are observed that expose a person to serious risk, those activities must be prohibited.**

Where contraventions cannot be immediately remedied while you are onsite, improvement notices are to be issued.

Example notices have been developed to assist in addressing noncompliance identified with audit criteria - see attachments.

**If you require technical support, contact Zachary du Preez** S. 47(3)(b) of the RTI **or Mimosa Mulvogue** S. 47(3)(b) of the RTI

### **Record keeping**

All CISr entries, inspector note books entries and other record keeping are to be made in line with established OIR practices. The campaign code for all assessments is STONEBENCHSTAGE2.

### **Instructions for use**

Undertaken an assessment of the workplace as per training provided.

Complete all fields of the audit tool, against each criteria. If an audit prompt is not applicable, record N/A in the relevant field/s.

<b>Audit criteria 1.</b>			
<b>Prohibition of dry cutting</b>			
<b>IF THIS</b>		<b>DO THIS</b>	
<b>1.1</b> Dry cutting, grinding or polishing is observed	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	IF YES - Oral direction prohibiting dry cutting activity. See model prohibition notice for dry cutting (attachment 1)
Guidance for inspectors Make sure for all processes observed: <ul style="list-style-type: none"> <li>• LEV or water suppression is used</li> </ul>			
Notes PCBU is currently wet cutting, grinding and polishing but has done air monitoring and is switching over to LEV system in the future. I liased that information with Zachary Dupreez.			
<b>1.2</b> Evidence is obtained from any person that dry cutting occurs at the workplace	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	IF YES - Oral direction prohibiting dry cutting activity. See model prohibition notice for dry cutting (attachment 1)
Guidance for inspectors <ul style="list-style-type: none"> <li>• Ask the PCBU or workers if all tasks are completed with LEV or water suppression</li> <li>• Even minor or one off fabrication tasks at the workshop or on site need to be conducted with LEV or water suppression, no exceptions.</li> </ul>			
Notes Not at this stage - i did send guide to LEV to PCBU			
<b>Monitoring and escalation for Audit Criteria 1</b> If a prohibition notice is issued the inspector should ensure that at unannounced visits occur to determine if the notice is being complied with. The inspector should also ensure the notice is displayed. Any non-compliance with the prohibition notice must be escalated for comprehensive investigation.			

**Audit criteria 2.**

**Minimising exposure to RCS**

IF THIS			DO THIS
2.1 Water suppression is used and is adequately managing dust risks	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	IF NO - Oral direction prohibiting activity. See model prohibition notice (attachment 1) <b>and</b> issue improvement notice for water suppression (attachment 2).
Guidance for inspectors - <ul style="list-style-type: none"> <li>Tools and machinery used have been specifically designed for use with water attachments (check all electrical grinders, polishers and drills if they are water suppressed)</li> <li>An adequate number of water feeds are directed at the material and/or tool to prevent visible dust during the process.</li> <li>Adequate water pressure is maintained to make sure water is reaching the material and/or tool.</li> <li>Adequate guards, plastic flaps or brush guards are used on suppressed tools and machinery.</li> </ul>			<ul style="list-style-type: none"> <li>Bridge saws are fitted with water attachments.</li> <li>Water suppressed routers, water jet cutters or bridge saws are used to complete sink and stovetop cut outs.</li> <li>Hand-held angle grinders are fitted with water feeds to deliver water to the cutting disc and point of contact with the stone.</li> <li>Wet-edge milling machines or polishing machines are water suppressed.</li> <li>Polishers have a centre water feed.</li> </ul>
Notes I observed and photographed a RUBI DU-200-BL wet saw with no guard to suppress the water from the cutting of the artificial stone giving rise to the risk of spraying water contaminated with RCS into the air. I issued an improvement notice.			
2.2 LEV is used but and is adequately managing dust risks	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	IF NO - Oral direction prohibiting dry cutting activity. See model prohibition notice for dry cutting (attachment 1) <b>and</b> issue improvement notice for LEV (attachment 3).
Guidance for inspectors – <ul style="list-style-type: none"> <li>Tools and machinery have been specifically designed for local exhaust ventilation attachments.</li> <li>Hand tools (for example drills, circular saws, grinders) are equipped with a shroud and a H class rated vacuum with a high efficiency particulate air (HEPA) filter.</li> <li>Install fixed, portable or flexible capturing hoods to capture dust are <u>at or very close to the point of generation</u>.</li> </ul>			
Notes N/A at this stage.			
2.3 Workers are isolated from dust generating process	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	IF NO - One improvement notice for each contravention should be issued. See model improvement notice for isolation (attachment four). Multiple deficiencies within the same control may be accommodated on the one notice.

Guidance for inspectors –

- Water mist created by workers or machinery is observed moving into other work areas or towards other workers.
- Workers are not provided a separate room or area away from the fabrication area for food preparation and dining.

Notes

I did not observe any mist moving into other work areas. Workers are provided another room to eat their meals.

**2.4** Adequate ventilation is provided for workers

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

IF NO - One improvement notice for each contravention should be issued. See model improvement notice for ventilation (attachment five).  
Multiple deficiencies within the same control may be accommodated on the one notice.

Guidance for inspectors –

- There is good natural or mechanical ventilation.

Notes

Two large roller doors are left open during operational business hours.

**2.5** Cleaning and housekeeping is adequate

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>

IF NO - One improvement notice for each contravention should be issued. See model improvement notice for cleaning (attachment six).  
Multiple deficiencies within the same control may be accommodated on the one notice.

Guidance for inspectors –

Check there is a dedicated cleaning regime in place. It should have the elements identified in training.

These include;

- Must be done daily
- Must be done by low pressure water, wet sweeping or a H class rated vacuum with a HEPA filter
- Floors, walls and all surfaces must be cleaned
- Dry sweeping and compressed air must be prohibited

Notes

PCBU has a full time cleaner staff member, workplace is cleaned at the end of each day using low pressure hose. I observed and photographed the office and lunch room area where workers and others access. RCS dust was observed on the counter tops and other horizontal surfaces and there was no evidence of an adequate cleaning regime in place. I issued an improvement notice.

<b>2.6</b> Wet dust and slurry is managed managed	Yes  <input checked="" type="checkbox"/>	No  <input type="checkbox"/>	IF NO - One improvement notice for each contravention should be issued. See model improvement notice for wet dust management (attachment seven). Multiple deficiencies within the same control may be accommodated on the one notice.
<p>Guidance for inspectors –          This measure is related to cleaning however is aimed at preventing dust build-up following the drying of dust containing water.          Check for the following indicators of poor housekeeping:</p> <ul style="list-style-type: none"> <li>• Dry dusty floors</li> <li>• Uncontrolled water spray from tools and equipment by either:             <ul style="list-style-type: none"> <li>○ not using guards, plastic flaps, brush guarding or</li> <li>○ damaged or missing flaps or guarding on machinery or equipment</li> </ul> </li> <li>• Water spray of one process discharging into adjacent work areas</li> <li>• Water pooling and on the floor and being allowed to dry</li> <li>• Stone sludge building up and clogging drains</li> </ul>			
<p>Notes</p> <p>The full time cleaner hoses the slurry into the grate and down into the pit and it goes through a flotation pump and gets filtered through bags. The bags are then dumped sealed into the waste bins.</p>			
<p><b>Monitoring and escalation for Audit Criteria 2.</b>          Shortly after the compliance date assess (whether by attendance at the workplace or otherwise) that the deficiencies identified have been remedied and the steps that were required to be taken have been taken.</p> <p>Obtain sufficient evidence to demonstrate that the contravention has been remedied. Where compliance has not been achieved escalate the matter to the Project co-ordinator.</p>			

**Audit criteria 3.****Health monitoring**

IF THIS			DO THIS
3.1 Health monitoring is being undertaken for each worker exposed to RCS.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	IF NO - One Improvement notice for health monitoring (see attachment eight). Allow 8 weeks for compliance - Medical appointments may take some time to arrange.

Inspector guidance –

- For the health monitoring requirements and standards see the industry guidance pack.
- If health monitoring has been undertaken (or is purported to have been undertaken) then the enforcement action should NOT be taken.
- Contact the Project Co-ordinator for further advice on how to assess whether the health monitoring is acceptable.

Notes  
PCBU has contacted workcover and has organised for his workers to get their health monitoring done.

**Monitoring and Escalation for Audit Criteria 3.**  
Shortly after the compliance date assess (whether by attendance at the workplace or otherwise) that the following steps towards health monitoring have been taken. The long compliance time allowed in the notice is so that this can be achieved by the PCBU.

- A worker has attended for the initial medical examination with the health practitioner undertaking the health monitoring.
- The health practitioner is either (1) from the list of occupational physicians or (2) the PCBU has supplied evidence that the practitioner is experienced in health monitoring.

If the above is not demonstrated the improvement notice has not been complied with. The non-compliance must be escalated for comprehensive investigation with a view to prosecution. The referral should be made within two weeks of identification of non-compliance and in accordance with the referral protocol.

**Audit criteria 4.****Respiratory Protective Equipment**

IF THIS			DO THIS
<b>4.1</b> For each worker working within the RCS containing workshop: <ul style="list-style-type: none"> <li>• Each worker has suitable RPE</li> <li>• Each worker has a certificate of fit test.</li> </ul>	Yes  <input type="checkbox"/>	No  <input checked="" type="checkbox"/>	IF NO - One Improvement notice for provision. See model notice (attachment nine). One Improvement notice for fit test. See model notice (attachment ten).
Inspector guidance – <ul style="list-style-type: none"> <li>• Suitable RPE is supplied.               <ul style="list-style-type: none"> <li>○ at least a half face respirator with a P1 or P2 filter is provided to workers</li> <li>○ the respirator provided notes compliance with AS1716</li> </ul> </li> <li>• Each worker must have been fit tested. Evidence may be a certificate of fit test, fit test report or fit test card.</li> </ul>			
Notes PCBU has used Environmental Health Solutions to air monitor and they are only 0.02 in concentration for silica and do not require RPE.			
<b>4.2</b> For the workplace, a system exists for: <ul style="list-style-type: none"> <li>• Maintaining, repairing and replacing of RPE</li> <li>• Ensuring workers wear RPE at all times whilst in workshop</li> </ul>	Yes  <input type="checkbox"/>	No  <input checked="" type="checkbox"/>	IF NO - One Improvement notice for maintenance. See model notice (attachment eleven).
Inspector guidance – <ul style="list-style-type: none"> <li>• Workers must wear RPE at all times when fabricating bench tops (includes any cutting, grinding or polishing work and cleaning)</li> <li>• RPE must be maintained, repaired and replaced as necessary. The PCBU has not discharged their duty if they do not have a system in place.               <ul style="list-style-type: none"> <li>○ Check to see if workers are wearing broken or damaged RPE</li> <li>○ Request copies of invoices or receipts for RPE repairs</li> <li>○ Talk to workers about what they do with damaged RPE</li> <li>○ If disposable respirators are used make sure they are replaced at least daily</li> <li>○ Ask workers about cleaning and storage of RPE at the end of each shift</li> </ul> </li> </ul>			
Notes PCBU does not use RPE.			

**Monitoring and Escalation for Audit Criteria 4.**

Shortly after the compliance date assess (whether by attendance at the workplace or otherwise) specifically check the following.

- Suitable RPE has been supplied to all workers
- Each worker has a certificate of fit test
- The PCBU requires the use of RPE at all times when in workshop
- The PCBU has a RPE maintenance regime in place

**Audit criteria 5.**

**Information for workers**

IF THIS		DO THIS	
5.1 The PCBU has provided information to workers who are exposed to RCS, about the risk of exposure to RCS.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	IF NO - One Improvement notice for provision of information. See model notice (attachment twelve).

Inspector guidance –  
Ascertain whether the information supplied at least meets the information contained in the industry guide.

Notes  
PCBU has conducted toolbox talk with workers and showed workers the safety alerts and discussed air monitoring test results.

**Monitoring and Escalation for Audit Criteria 5.**

Shortly after the compliance date assess (whether by attendance at the workplace or otherwise) specifically check the following;

- Workers have been provided with a copy of the industry guide at a minimum.



**Audit criteria 6.**

**Consultation with workers**

IF THIS		DO THIS	
5.1 The workplace has undertaken consultation about making decisions about ways to eliminate or minimise risks relating to RCS including consultation on RPE selection.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	IF NO - One Improvement notice for consultation. See model notice (attachment thirteen).

Inspector guidance –

- Request evidence/records from the PCBU in relation to what consultation has been done.
  - Check for records of tool box talks
  - Ask workers about consultation

Notes  
I spoke with  , Bridge Saw Operator  said he is aware of the RCS Dust Risks and knows that the PCBU is looking at transitioning across to LEV.

**Monitoring and Escalation for Audit Criteria 6.**

Shortly after the compliance date assess (whether by attendance at the workplace or otherwise) that consultation with all workers has occurred. Specifically check the following.

- The consultation occurred with all workers who are exposed to RCS
- The consultation included consultation about minimising risks associated with RCS exposure.
- The consultation occurred only after the relevant information was shared.

Reset Form

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