

BK1

COSHH essentials in brick
and tile making: Silica

Clay milling (pug-mill)

Control approach 2 Engineering control

The Control of Substances Hazardous to Health Regulations 2002 (COSHH) require employers to ensure that exposure is prevented or, where this is not reasonably practicable, adequately controlled. This guidance gives practical advice on how this can be achieved by applying the principles of good practice for the control of exposure to substances hazardous to health, as required by COSHH.

It is aimed at people whose responsibilities include the management of substances hazardous to health at work (eg. occupational health specialists, anyone undertaking COSHH assessments and supervisors). It is also useful for trade union and employee safety representatives. It will help you carry out COSHH assessments, review existing assessments, deliver training and supervise activities involving substances hazardous to health.

This guidance is issued by the Health and Safety Executive. Following the guidance is not compulsory, unless specifically stated, and you are free to take other action. But if you do follow the guidance, you will normally be doing enough to comply with the law. Health and safety inspectors seek to secure compliance with the law and may refer to this guidance.

See Essential information near the end of the sheet.

What this sheet covers

This sheet describes good practice for the control of exposure to Respirable Crystalline Silica (RCS) dust from clay milling (pug-mill) during brick or tile manufacturing.

It covers the key points you need to follow to reduce exposure to an adequate level.

Follow all the points, or use equally effective measures.

Main points

- The milling and transfer of clay prior to watering can create high levels of dust containing RCS. When the water content is around 25%, dust generation is no longer an issue unless the clay is allowed to dry out.
- Contaminated work clothing may also be a source of dust exposure, even after the task has been completed.
- Air sampling may be needed to show that control of exposure to RCS is being maintained.
- Provide health surveillance when workers are regularly exposed to RCS dust and there is a reasonable likelihood that silicosis may develop.

Hazards

- ✓ RCS is also known as alpha-quartz, cristobalite or 'free silica', and can be wrongly labelled as 'amorphous silica'.
- ✓ RCS is hazardous by inhalation as the 'respirable' dust, which is very fine and invisible under normal lighting, can get deep into the lungs.
- ✓ The workplace exposure limit (WEL) for RCS is detailed in HSE publication [EH40/2005 Workplace Exposure Limits](#).
- ✓ Inhaling RCS can lead to:
 - Silicosis, which is a serious and irreversible lung disease that can cause permanent disablement and early death. There is an increased risk of lung cancer in workers who have silicosis.
 - Chronic obstructive pulmonary disease (COPD), which is a group of lung diseases, including bronchitis and emphysema, that results in severe breathlessness, prolonged coughing, chronic disability and can lead to death. The risk of COPD is increased by smoking.
- ✓ RCS dust is also abrasive and drying when in contact with skin, and can lead to contact dermatitis.

Access to work area

- ✓ Allow access to authorised and appropriately trained people only.
- ✓ Use CCTV to monitor the process and reduce the need for people to be in the area.

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- ✓ Segregate this task as far as possible to reduce spreading of airborne contamination to other workers.
 - ✓ Where possible, slope floors gently towards gulleys to help dust removal by wet washing.
 - ✓ Gulleys should not flow through clean areas, as there is a risk of the slurry drying out and dust becoming airborne.

Equipment and procedures

- ✓ Use clay with a lower crystalline silica content and/or higher water content to reduce airborne RCS generated during milling and transfer, where possible.
- ✓ Where necessary, use a vehicle fitted with a filtered air supply to the cab to transfer clay. See sheet BK7.
- ✓ Enclose the milling process and use local exhaust ventilation (LEV).
- ✓ Airflow must be sufficient to control airborne contaminants effectively. This will depend on the design, size of opening and the type of process and substance being controlled.
- ✓ Use LEV to capture dust at key stages along the conveyor, like the drop points. Dust captured may be reclaimed and returned to the conveyor.
- ✓ Always minimise the distance that clay has to fall.
- ✓ Cover the transfer conveyors, where possible, to reduce the amount of dust becoming airborne.
- ✓ Have a clean supply of air coming into the workroom to replace extracted air.
- ✓ Discharge extracted air to a safe place away from doors, windows and air inlets. You can re-circulate thoroughly clean filtered air into the workroom, but under these circumstances incorporate monitoring and an alert system (eg. alarm or indicator).
- ✓ Provide an easy way of checking the LEV is working, eg. airflow indicator or equivalent. Fit an indicator or alarm to show if filters have blocked or failed.
- ✓ Always confirm that the extraction is turned on and working at the start of work. Check the gauge.

Respiratory protective equipment (RPE)

- ✓ RPE is normally not needed.
- ✓ RPE may be needed for maintenance and cleaning.

Personal protective equipment (PPE)

- ✓ Ask your supplier to help you select the right PPE.
- ✓ Provide separate storage for clean and contaminated PPE.
- ✓ Use a contract laundry or a suitable equivalent to wash work clothing. Warn them that the dust contains silica.
- ✓ Provide coveralls that do not retain dust – synthetic rather than cotton.
- ✓ Provide protective gloves suitable for working with RCS.

Personal decontamination and skin care

- ✓ Provide warm water, mild skin cleansers, and soft paper or fabric towels for drying. Avoid abrasive cleansers.
- ✓ Provide pre-work skin creams, which will make it easier to wash dirt from the skin.
- ✓ Provide after-work creams to replenish skin oils.



Caution: 'Barrier creams' are not 'liquid gloves' and they do not provide a full barrier.

Maintenance, examination and testing

- ✓ Keep all equipment used for the task in effective working order. Maintain it as advised by the supplier or installer.
- ✓ Establish a plan for regular preventative maintenance.
- ✓ Check for signs of damage to control equipment before starting work.
- ✓ Have equipment thoroughly examined and tested against its performance standard, at suitable intervals.
- ✓ For LEV, a user manual or log book is helpful in setting out the frequency of checking, maintenance or parts replacement.
- ✓ For LEV with no user manual or log book, you may need the help of a competent person. They can determine the performance needed for adequate control.
- ✓ Keep records of all examinations for at least 5 years.
- ✓ LEV systems require a statutory 'thorough examination and test' (TExT).
- ✓ Get a competent person to perform the TExT at least every 14 months.
- ✓ Carry out all actions arising from the TExT.
- ✓ HSG258 provides more detailed information on LEV systems and legal and competence requirements.
- ✓ Several measures are available to check effectiveness of controls, ranging from simple qualitative (eg. use of a dust lamp) to complex quantitative techniques (eg. air sampling) usually for higher-risk scenarios.

Cleaning and housekeeping

- ✓ Throughout the day, clear up clay on floors and surfaces to prevent it drying out.
- ✓ Vacuum dry dust or use wet cleaning methods.
- ✓ Use vacuum equipment that meets at least the dust Class M (medium hazard) classification to remove dust.
- ✓ Clean down the enclosure and equipment as soon as possible after use.
- ✓ Keep machinery and the workroom clean.
- ✓ Dispose of wastes safely.
- ✓ Wash down the workroom at the end of each day's work.

Caution: Never allow the use of brushes or compressed air for removing dust from skin and clothing. Avoid the use of brushes or compressed air for removing dust from surfaces or from inside machinery.

Health surveillance

- ✓ Provide health surveillance when workers are regularly exposed to RCS dust and there is a reasonable likelihood that silicosis may develop. See sheet G404.
- ✓ Provide health surveillance for dermatitis where there is a reasonable likelihood that dermatitis may occur in your workplace. See sheet G403.

Training and supervision

- ✓ Tell workers about the hazards associated with their work and how to prevent and recognise early signs of lung damage and dermatitis from exposure to RCS and wet working.
- ✓ Provide workers with training on operating the equipment and using the control measures correctly, and to report any faults immediately.
- ✓ Provide supervision – ensure that safe work procedures are followed.
- ✓ Involve managers and supervisors in health and safety training.
- ✓ Training records are helpful to demonstrate what information, instruction and training has been provided.

Essential information

G403 – Health surveillance for occupational dermatitis

G404 - Health surveillance for those exposed to respirable crystalline silica (RCS)

G406 – New and existing engineering control systems

G409 – Exposure measurement: Air sampling

Further information

Occupational Safety and Health Consultants Register: www.oshcr.org/

COSHH Essentials sheet BK0– Table showing Crystalline Silica concentrations in common materials

Institute of Local Exhaust Ventilation Engineers: <http://www.cibse.org/>
Institute-of-Local-Exhaust-Ventilation-Engineers-I

Controlling airborne contaminants at work: A guide to local exhaust ventilation (LEV), HSG258 <http://www.hse.gov.uk/pubns/books/hsg258.htm>

Local exhaust ventilation (LEV) workplace fume and dust extraction: www.hse.gov.uk/lev/

INDG 408 – *Clear the air: A simple guide to buying and using local exhaust ventilation (LEV)*

Respiratory protective equipment at work: A practical guide, HSG53 (Fourth edition), HSE Books 2013, ISBN 978 0 7176 6454 2, <http://www.hse.gov.uk/pubns/books/hsg53.htm>

Preventing contact dermatitis and urticaria at work, HSE Books, INDG233(rev2), published 07/15, Introduction, www.hse.gov.uk/pubns/indg233.pdf

Health surveillance for those exposed to respirable crystalline silica (RCS) - Guidance for occupational health professionals, Published 2015, <http://www.hse.gov.uk/pubns/priced/healthsurveillance.pdf>

You can find the full COSHH essentials series at <http://www.hse.gov.uk/coshh/essentials/index.htm>

Information on health and safety in the brick and tile manufacturing industry can be obtained from:

The British Ceramic Confederation at www.ceramfed.co.uk/

The Health and Safety Executive at <http://www.hse.gov.uk/non-metallic-minerals/heavy-clay.htm>

Employee checklist

Do you understand the health hazards associated with your work?

Are you sure about safe work procedures?

Are you sure how to use all dust controls?

Is the dust extraction working? Check the gauge.

Look for signs of leaks, wear and damage every day.

If you find any problems, tell your supervisor. Don't just carry on working.

Clear up spills promptly before the clay dries out.

Make suggestions to improve the effectiveness of dust control.

Co-operate with health surveillance.

Use, maintain and store your protective equipment in accordance with instructions.

Wash hands before starting the job, and before eating, drinking, smoking or using the lavatory.

Follow any skin care programme provided.

For information about health and safety visit <https://books.hse.gov.uk>
or <http://www.hse.gov.uk>

You can view HSE guidance online and order priced publications from
the website. HSE priced publications are also available from bookshops.

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