

Silica Program Assistant — Scope & Application Brief

CC-WP-SILICA-001-001 · Rev 0.1 · Version v1.1 · 29 CFR 1926.1153 (Table 1 · (c)(2)–(c)(3)) · Class B-1 Program Assistant — Documentation Framework Only

Tool	CC-SILICA-PROGRAM-ASSISTANT-001 · v1.1	Authority	29 CFR 1926.1153 (Table 1 · (c)(2)–(c)(3))
Class	B-1 Program Assistant — Documentation Framework Only	Publisher	Compliance Crucible LLC

Documentation framework only. This tool supports the documentation of an employer's silica written exposure control plan / program record. It does not determine compliance, verify exposure levels, assign respirators, make medical determinations, replace the competent person, or authorize work. The employer retains sole and non-delegable responsibility under 29 CFR 1926.1153 and applicable state plans.

01 What Is the Silica Program Assistant?

The Silica Program Assistant is a structured documentation tool for employers who need to organize and review a respirable crystalline silica written exposure control plan / program record for construction work.

It is built around 29 CFR 1926.1153 and the practical documentation questions that arise when silica-generating work is planned, performed, reviewed, or audited:

- What tasks may generate respirable crystalline silica?
- What materials and equipment are involved?
- Is the employer documenting a Table 1 path, an alternative exposure assessment, or a monitoring path?
- What controls were recorded?
- What respiratory-protection interface was documented?
- Who is the competent person?
- What housekeeping, communication, medical-surveillance, and review records are connected to the plan?

The tool does not replace the employer's responsibility. It helps the employer build a more complete record.

02 What the Tool Produces

A completed record can produce four practical documentation outputs.

Written Exposure Control Plan record

Assembles employer, project, task, path, control, respiratory, competent-person, housekeeping, medical-surveillance, communication, and review information into a written exposure control plan-style record.

Field / Task Control Attachment

A task-facing attachment summarizing the selected task, documented path, controls, housekeeping method, respiratory interface, competent person, and escalation information.

Auditor / Reviewer Report

A reviewer-facing report showing gate status, open documentation items, record status, lock information, and the employer-responsibility notice.

Machine Audit JSON

A machine-readable record of the program state, including version, record status, selected paths, task data, open items, lock source, and export metadata.

03 What the Tool Does Not Do

The Silica Program Assistant:

- does not determine compliance;
- does not certify safety;
- does not approve or authorize work;
- does not verify exposure levels;
- does not assign respirators or decide whether respiratory protection is required;
- does not make medical-surveillance determinations;
- does not replace the competent person;
- does not replace a safety professional, industrial hygienist, PLHCP, legal counsel, or employer decision-maker;
- does not make state-plan determinations;
- does not upload or validate evidence files in this release;
- does not perform a live authority lookup in this release.

The tool documents what the employer enters and organizes the record around the required decision points.

04 Authority Boundary

The Silica Program Assistant is a documentation framework. It uses an embedded, vetted Table 1 dataset and prompts the user through silica program documentation areas — task identification, Table 1 documentation, alternative exposure-assessment metadata, performance or scheduled monitoring metadata, engineering and work-practice controls, the respiratory-protection interface, competent-person review, the medical-surveillance interface, communication, training, housekeeping, written-plan assembly, review gates, and outputs.

The tool's strongest statement is that **documentation fields are complete for a task**. That does **not** mean:

- that Table 1 is satisfied;
- that the employer complies;
- that exposure-assessment relief applies;
- that controls are OSHA-approved;
- that work may proceed.

The employer retains sole responsibility for actual work conditions, exposure assessment, control selection and implementation, respiratory-protection decisions, medical surveillance, training, recordkeeping, and compliance.

05 Proper Use Case

The proper use case is an employer or authorized representative using the tool to build and preserve a structured silica program record. Appropriate uses include:

- preparing a written exposure control plan record;
- documenting silica-generating tasks;
- recording Table 1 task, condition, control, and duration documentation;
- recording alternative exposure-assessment metadata;
- recording performance or scheduled monitoring metadata;
- recording engineering and work-practice controls;
- recording housekeeping and dust-control methods;
- recording competent-person information;
- recording respiratory-protection interface information;
- recording medical-surveillance interface information;
- recording communication, training, and SDS references;
- reviewing open documentation items before locking a record;
- producing a written plan, field attachment, reviewer package, or machine audit JSON.

The tool is especially useful when an employer wants a record that shows the basis of the program documentation rather than a loose checklist or disconnected form.

06 Improper Use Cases

Do **not** use the Silica Program Assistant:

- as a substitute for exposure assessment, air monitoring, or objective data;
- to decide that an employer or program is compliant;
- to approve or authorize a task or work;
- to avoid competent-person review;
- to assign respirators or replace a respiratory protection program;
- to make medical-surveillance decisions;
- to force a Table 1 match when the task does not fit;
- to treat missing documentation as acceptable;
- as proof that actual field conditions were correct.

The tool helps organize documentation. It does not make the underlying safety or compliance decisions.

07 Platform Access

The Silica Program Assistant is part of the Compliance Crucible platform. It is available through member-gated access; active Compliance Crucible membership is required. With member access, records save to the organization's workspace under row-level access controls and can be reviewed, locked, and exported; a locked record recomputes to its stored verification value. Without member access, records are not persisted.

The Silica Program Assistant sits alongside the other live Compliance Crucible documentation tools — Confined Space (PRCS) Documentation Readiness, LOTO Procedure Builder, JHA / AHA Procedure Builder, Fatal Four Recognition, and HazCom / GHS — each tied to a defined regulatory scope with clear output boundaries. Additional program tools are in development.

The common purpose is simple: Compliance Crucible does not replace the employer's judgment — it helps the employer create a better record of that judgment.

This brief is a descriptive scope and application document only. It is not regulatory guidance, a legal opinion, an industrial-hygiene or engineering service, a certification, an approval, or an employer field decision. Requirements for respirable crystalline silica are complex and employer-, task-, and site-specific. Independent verification of applicable requirements is required for every project and every employer. Compliance Crucible LLC does not practice law, practice engineering, practice industrial hygiene, verify exposures, assign respirators, make medical determinations, certify conditions, authorize work, or make employer field decisions.