

September 25, 2026

CAL/OSHA Rulemaking Board,

The proposed emergency rulemaking to prohibit the fabrication of engineered stone countertops containing more than one percent crystalline silica is an important step to begin protecting workers exposed to these hazardous materials. As occupational health researchers from Illinois with over 25 years of professional occupational health and safety experience each, these fabricated stone products cannot be made safe without 100% isolation of the cutting process along with full automation. However, the working conditions in nearly all cutting shops do not have adequate protection to safeguard the health of workers exposed to the high-silica dust. Manufacturers primarily recommend wet cutting as the solution for eliminating or reducing risk of exposure. However, wet cutting only limits dispersal of the dust at the time of cutting. Exposure assessments of these cutting facilities show that the wet dust rapidly dries and mixes into the air posing a respirable hazard. This means that substituting these dangerous products with less hazardous products is the most appropriate solution. Relying on PPE as the primary form of protection has been shown to be inadequate regardless of the respiratory hazard, but in particular when dealing with extremely hazardous materials.

In Illinois, our sentinel case of silicosis caused by exposures to fabricated stone materials involved a 28-year-old worker who started working for a company that installs fabricated stone countertops after his father helped him get a job at the company. Several years after starting to work with the employer, he developed severe silicosis. At the age of 32 years old, he required a lung transplant, and he is now permanently disabled. The severe health risks posed by these fabricated stone products are real.

California is usually the leader in occupational safety. In many other states, occupational health and safety professionals recognize that if California leads the way by implementing a new rule change, it paves the way for the rest of the states to implement similar protections. This emergency rulemaking will assist us in Illinois to advocate for similar rulemaking to protect workers in our state.

We strongly support the decision to implement the proposed emergency rulemaking to prohibit the fabrication of engineered stone countertops containing more than one percent crystalline silica. There are safer alternatives that cost nearly the same or less than these materials and are widely available in the U.S. market. Other countries have already banned these products, so should we.

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