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COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND

July 13, 2017

COMMITTEE ASSIGNMENTS:
COMMERCE AND LABOR (VICE CHAIRMAN)
FINANCE
SCIENCE AND TECHNOLOGY

C. Ray Davenport, Commissioner
Virginia Department of Labor & Industry
600 E Main St Ste 207
Richmond VA 23219-2416

Dear Commissioner Davenport:

I am writing to concur with the request made by the National Utility Contractors Association of Virginia (NUCA of Virginia) urging that enforcement of the Respirable Crystalline Silica standard be delayed through 23 September, at a minimum. Considering the decision made by the Occupational Safety and Health Administration (OSHA) to delay federal enforcement of this standard until that date, the request by NUCA of Virginia to have the Virginia Occupational Safety and Health (VOSH) program adopt the same schedule is both reasonable and prudent.

As expressed by NUCA of Virginia, the industry is experiencing understandable difficulty in complying with these standards. As evidenced by OSHA's decision to delay enforcement, the challenges associated with this standard are not unique to contractors operating in Virginia. I am especially concerned that Virginia's construction industry – and those employed in that industry – would be adversely affected and disadvantaged were it forced to adhere to a standard that has already been delayed by the controlling federal authority.

I greatly appreciate your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Kathy Byron".

Kathy J. Byron
Virginia House of Delegates
22nd District