



MANAGEMENT BULLETIN

June 2007

HEXAVALENT CHROME - CR (VI)



Regulation:

As reported to previous Management Bulletin (*June 2006*) allowable exposure on hexavalent chrome is approximately 90% lower than 16 months ago.

OSHA requires on-site exposure determination by scheduled monitoring or a performance oriented option using any combination of air monitoring data, historical monitoring data or objective data.

A key element in addressing this issue is implementing best practices listed below.

This regulation effects shops with less than 20 employees effective 6/1/07.

Problem:

The primary sources of the CR (VI) in the shop are coatings containing chrome and the sanding or welding of metal that have such coatings.

Primary exposure is from yellow, orange, and red pigments.

Solution:

If you have not already done so, eliminate any chrome containing coatings from your shop. Your jobber should substitutes readily available.



Incorporate Cr (VI) hazard into your Hazard Assessment and Hazard Communication (Right-to-Know) Program and training. *This has been done for the past 15 months as part of the EnviroSafe process.*

Include the following “best practices” into your shops operations:

- Eliminate Cr (VI) coatings from your business

- Use HEPA vacuum sanders and wet sanding to minimize dust

- When potential Cr (VI) coatings are being welded or sanded, using compressed air for cleaning parts is prohibited. At other times, no greater than 30 pounds for cleaning parts is permissible.

- Use proper respiratory (3M’s N95 or equivalent), eye, and skin protective equipment.

- Make sure your respirator program including OSHA medical evaluations, annual training and fit testing, change out schedule, etc. is fully implemented.

- Dust from hazardous materials should be properly handled and disposed of as hazardous waste.

If you should have questions or need any additional information, please call (800) 619-9733.

The information in this Compliance Alert is for directional purposes only and should not be used to determine regulatory compliance.