

Manual Section 3	Issue Date 03/17/22/16	Revision Date 01/01/24	Policy Number LLCP-028
Hexavalent Chromium			

Purpose

Workers in many different occupations are exposed to hexavalent chromium (Cr(VI)). Occupational exposures occur mainly among workers who handle pigments containing dry chromate, spray paints and coatings containing chromate, operate chrome plating baths, and weld or cut metals containing chromium, such as stainless steel. Stainless steel welding involves the greatest exposure to hexavalent chromium.

Scope

All LLC Companies including, Blanchard Industrial, LLC, GIS Engineering, LLC, Grand Isle Shipyard, Inc., and GWIS, Mack Steel, NuWave, Sun Industries, Valvemax, Discovery Industries, Inc.; hereafter identified as “Company”.

Training Requirements

Any worker that may have the possibility of working with or near Hexavalent Chromium must be trained of its hazards and how to control them as well as medical surveillance prior to the possible exposure.

Engineering and Work Practice Controls

Engineering and work practice controls should be provided to reduce exposure to the lowest feasible level. If employees can demonstrate that such controls are not feasible, employer shall use engineering/work controls to reduce employee exposure to the lowest levels achievable, and shall supplement them by the use of respiratory protection.

When employee’s exposure is or expected to be in excess of the PEL, regulated areas must be established. Regulated areas shall be marked with warning signs to alert employees. Access is restricted to "authorized persons" and all other employees must be protected from contaminants.

Respirators must be used when engineering controls and work practices cannot reduce employee exposure, during work operations where engineering controls and work practices are not feasible, and emergencies.

PPE must be provided at no cost to the employee when there is a hazard from skin or eye contact. Gloves, aprons, coveralls, goggles, foot covers etc. Contaminated PPE will be removed at the end of the work shift. All contaminated PPE shall be clean, launder, repair and/or replace.

Housekeeping

Surfaces shall be maintained as free as practicable of accumulation of chromium. All spills and releases of chromium shall be cleaned promptly. Methods of cleaning include HEPA filtered vacuums, dry or wet sweeping, shoveling or other methods to minimize exposure.

Change rooms shall be provided for decontamination and ensure facilities prevent cross-contamination. Washing facilities shall be readily accessible for removing chromium from the skin. Employees must wash their hands and face or any other potentially exposed skin before eating, drinking or smoking.

Exposure Monitoring

An initial exposure assessment must be conducted to evaluate personnel exposures and whether they are at or above the OSHA action level.

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Monitoring must be conducted such that it is representative of the work shift and include each job category (i.e., similar exposure group) involved in the work activity/task. During the initial exposure determination, personnel exposures should be treated as unknown.

Exposure monitoring data may also be used from previous jobs/tasks if conducted within the last 12 months and are of a similar operation/process where workplace conditions closely resemble the processes, materials, control methods, work practices, and environmental conditions used in the current job/task.

Where exposures are determined to be below the action level (2.5micrograms/m³), a written record of this determination shall be documented. Where exposures are determined to equal or exceed the action level, personnel exposure monitoring shall be conducted that is representative of personnel in the work area. Monitoring shall be conducted every 6 months where exposures are at or above the action level. For exposure at or above the occupational exposure limit, monitoring shall be conducted every 7 days.

No employee shall be exposed in excess of the PEL of 5 micrograms per cubic meter of air as an 8-hour TWA.

Medical surveillance shall be provided when an employee experiences signs or symptoms of the adverse health effects of Hexavalent Chromium (dermatitis, asthma, bronchitis, etc). Medical evaluations will be provided at no cost to employees. Examinations will be performed by or under the supervision of a physician or other licensed health care professional.

Periodic monitoring shall be conducted at least every 6 months if initial monitoring shows employee exposure. Air monitoring will be performed at the beginning of each job task. If exposure monitoring results indicate exposure is above the PEL, a written notification must be included with the corrective action being taken to reduce exposure to or below the PEL.

The Company will maintain and make available an accurate record of all employee exposure monitoring, medical surveillance and training records.

Procedure

Regulated areas must be established when an employee's exposure approaches the Action Level or is expected to be in excess of the PEL. Regulated areas shall be marked with warning signs to alert employees. Access is restricted to "authorized persons".