

Ex. 15
ACCSH/1994-5

MEMORANDUM

TO: ACCSH 

FROM: John B. Moran, Chair
Hexavalent Chromium Work Group

SUBJECT: Work Group Report/Recommendations

DATE: 8 December 1994

The Hexavalent Chromium Work Group met on the afternoon of 8 December 1994. Members Rhoten, Paul, Osario and Moran were present. OSHA CrVI Team members Freeman, Condit, and Lignon were also present.

The Chair's memorandum to the Work Group dated 10 November 1994 (and OSHA) was reviewed and discussed including the OSHA response regarding the ORC request that standards activity be delayed pending completion of a research study by Johns Hopkins. The Assistant Secretary's response to ORC was reviewed. That response indicated that the rulemaking activity would proceed.

The Work Group concluded that a number of issues were of importance with regard to the proposed rule and its application to the construction sector. These included:

1. While many of the elements of a comprehensive standard addressing exposures to CrVI will be common in both general industry and construction, such as medical surveillance, many other elements must be construction specific.
2. The presumptive exposure approach used in the Interim Final Lead Standard for Construction is an appropriate approach to be used in the CrVI standard elements applicable to construction. The "scope" of the Interim Lead Standard was viewed as appropriate to the proposed CrVI standard.
3. Much additional data is needed to better frame the construction environment situations where exposures to CrVI are likely. To that end, the Work Group members agreed to:
 - a. Provide research literature collected by the Chair to OSHA pertaining to CrVI exposures during welding operations (done).
 - b. Seek information from the SSPC with regard to metal coatings containing CrVI in the past and current coating products containing CrVI. (Moran).
 - c. Seek information from the California lead registry regarding CrVI. (Osario).

- d. Seek information from bridge work involving lead-chromate paint in California and under the scope of the CT CRISP study. (Osario).
- e. Seek information on the prevalence of CrVI as a hazardous waste contaminant on NPL sites. (Moran).
- f. Seek information on the presence of Cr in the DOD MSDS Data file (Moran).
- g. Provide estimates of the percentage of work conducted in welding operations involving metal compositions which include Cr. (Rhoten).
- h. Seek information from welding equipment and welding stick manufacturers on products containing Cr to include pipefitters and boilermakers. (Rhoten).
- i. Seek information on the prevalence of welders in the construction industry in the California Asthma Registry (Osario).
- j. Establish a coordination point with the BCTD Welding Fume Subcommittee. (Rhoten and Moran).

The Work Group sees the immediate need to obtain data on the CrVI exposures occurring in lead-based paint disturbance activities involving lead-chromate paints. The key question is whether the current protection provided under the Interim Lead Standard provide appropriate protection for exposures to CrVI. Several of the actions noted above are aimed at that objective.

The Work Group recommends:

1. That the members seek the information outlined above and provide that information to the OSHA CrVI standards team.
2. That the Work Group hold a half-day meeting immediately prior to the next Committee meeting for the purpose of reviewing the information collected and its significance.
3. That OSHA provide the Work Group the draft regulatory text of the CrVI proposed standard at the earliest opportunity.