

## HOW TO GET STARTED WITH COMPLIANCE

Under court order, OSHA must issue its final regulation by January 18, 2006. The first step to achieve compliance is to conduct an initial air monitoring assessment on workers that are believed to have potential exposure. Further obligations under the standard are based on the results of this assessment and may include periodic monitoring, establishing regulated areas, implementing control measures, and performing periodic medical surveillance. Air sampling assessments must be conducted using sampling and analytical methods that meet OSHA's accuracy and statistical confidence specifications, for example using OSHA method ID-215.

When performing these assessments, employers must characterize the exposure of each employee. In most cases, monitoring "representative" employees will be sufficient. Representative exposure sampling is permitted when a number of employees perform the same job under the same conditions. For these situations, it is sufficient to monitor a fraction of these employees in order to obtain data that are "representative" of the remaining employees. However, the employer must monitor the employee(s) reasonably expected to have the highest exposure. For example, this may involve monitoring the employee closest to an exposure source. The results may then be attributed to the remaining employees in the group.

Exposure monitoring needs to include, at a minimum, one full-shift sample taken for each job function in each job classification, in each work area, for each shift. These samples must consist of at least one sample characteristic of the entire shift or consecutive representative samples taken over the length of the shift.

Where employees are not performing the same job under the same conditions, representative sampling will not adequately characterize actual exposures. It may be necessary to monitor all exposed employees.

Initial air monitoring need not be conducted under two limited circumstances:

1. The employer may rely on the results of previous monitoring if it was performed in the past 12 months and the data were obtained during work operations conducted under workplace conditions closely resembling the current processes, types of material, control methods, work practices, and environmental conditions.
2. The employer may rely on "objective data" demonstrating that the work operation or the product may not reasonably be foreseen to release Cr(VI) in airborne concentrations at or above the Action Level (0.5 µg/m<sup>3</sup>) under the expected conditions of use that will cause the greatest possible release (or in any plausible accident). When using the term "objective data," OSHA is referring to manufacturers' or trade associations' worst case studies, laboratory studies, mathematical modeling, and other research that demonstrates (usually by means of exposure data) that meaningful exposures cannot occur.

**Compass Health & Safety professionals have performed hundreds of air monitoring assessments and thoroughly understand the proposed OSHA regulation. For air sampling test results and reporting you can trust, contact us at 800-682-5963 or visit our web site at <http://www.compass-hs.com>**