SCALES NW, INC HEXAVALENT CHROMIUM PROGRAM

Purpose
The purpose of this safety policy is to establish procedures for the protection of safety and health of Scales NW, Inc employees and contractors.

Scope
This policy applies to all Scales NW, Inc employees who work near welding operations or who perform hot work.

Responsibilities
Safety manager

- Develop and implement the Hexavalent Chromium program
- Identifying and list employees affected by this safety policy and procedure
- Provide training for affected employees
- Audit the program to ensure its effectiveness
- Determine tasks performed that present hazards

Supervisors

- Ensure only those employees who have been trained in the Hexavalent Chromium Program are working near Hexavalent Chromium hazards.
- Ensure that PPE is available for use by employees
- Ensure safety procedures are being followed
- Address employee concerns in the field

Employees

- Follow safety procedures for safe work on the job
- Notify the supervisor if concerns for safety are present that cannot be eliminated.
- Ensure PPE is in good condition and fitted correctly

Training

- All Employees with the potential of being exposed to Hexavalent Chromium shall be trained, initially and annually, in this procedure according to OSHA 1910.1026(I)(2). Additional training shall include Respiratory Protection Policy, Personal Protective Equipment Policy and the Hazard Analysis Plan.

- Additional training materials can be obtained from the safety manager.
- Every effort shall be made to protect employee exposure to Hexavalent Chromium.
- This policy is available for employees and owners or their representatives to review or copy at the job site. Additional pertinent information can be obtained from the safety manager.
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Testing, Air Monitoring, Identifying, Maintenance, Ventilation, Protection Devices, and Communication

Scales NW, Inc is responsible for:
- Testing
- Air monitoring
- Identifying
- Maintenance
- Upkeep of ventilation systems
- Protection devices
- Providing decontamination and personal hygiene facilities
- Communicating with client representative
- Location of areas and surfaces which pose potential exposure to Hexavalent Chromium.

Employees will be monitored every six months if the initial monitoring shows employee exposure in accordance with OSHA 1910.1026(d)(2).

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. Respirators will be provided to employees in accordance with OSHA 1910.134.

Exposure
- The supervisor is responsible for communicating with the client facility representative and SCALES NW, Inc. safety manager concerns pertaining to identifying work areas and surfaces, which pose potential exposure to Hexavalent Chromium.
- The supervisor is to ensure that no employee is exposed to Hexavalent Chromium permissible exposure levels above 5 micrograms per cubic meter of air (5 ug/m3) and the Action Level of 2.5 ug/m3 calculated as an 8-hour time weight average.
- Engineering controls shall be implemented if the exposure level is above the PEL for more than 30 days per calendar year.
- If at any time an employee is suspicious or aware of potential exposures that are not addressed, the employee is to contact the supervisor who will then coordinate with the client representative and the SCALES NW, Inc. safety manager in addressing the Employees concerns.
- Once areas and surfaces of potential Hexavalent Chromium exposure have been identified, the Supervisor is to coordinate with the client facility representative and the SCALES NW, Inc. safety manager to ensure employees are adequately protected from harmful exposure. This protection may include engineering controls, Respiratory Protection, Personal Protective Equipment Policy and additional training that may be needed.
Supervisors must ensure proper housekeeping of all surface areas. Surface areas shall be as free as practicable of buildup of Hexavalent Chromium in order to limit the exposure levels. Personal Protective Equipment will be provided at no cost to the employee in order to prevent emergency situations-1910.1027 (h), 1926.1127(h).

Additional Personal Protective Equipment may include:

- A respirator appropriate for Hexavalent Chromium particles, including PAPR’s according to OSHA 1910.1026 (g).
- Suitable coveralls and gloves.
- Activities should be conducted in well-ventilated areas to which access has been restricted.
- Plastic ground covers should be utilized to the extent possible to contain contaminants and facilitate cleanup.
- Gloves, respirators, coveralls, and rags should be decontaminated or placed in double bags, sealed and held for proper disposal.
- The need for Personal Medical Monitoring should be evaluated and provided as required.

Personal Protective clothing exposed to Hexavalent Chromium should not be cleaned by:

- Air blasting
- Shaking
- Any method that could create air borne Hexavalent Chromium particulate.
- 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 in accordance with OSHA 1910.1026 (j)-1910.1026 (j) (2) (i).

Personal Hygiene

- All employees exposed to Hexavalent Chromium should wash their hands and faces before eating, drinking or smoking.
- No eating, drinking or tobacco products are allowed in the area where possible Hexavalent Chromium exposure may occur.
- Workers should shower and decontaminate before leaving work site.
- Vehicles should not be parked in contaminated areas.
- Employees are to maintain an extremely high level of personal hygiene.
Possible sources of Exposure are:

- Welding and cutting
- Paints
- Braising and welding filler material
- Chromium plated steel
- Chromate pigments and powders

The Job Safety Analysis (JSA) and pre-job planning will include Hexavalent Chromium Awareness to ensure that work activity precautions are developed and communicated to each employee involved.

Signage and barricades shall be placed at a sufficient distance to protect any employee for entry into the areas, which pose hazards from Hexavalent Chromium in accordance with OSHA 1910.1026(e)(1)-(e)(3)(i).

All work activities involving Hexavalent Chromium are to be coordinated with the SCALES NW, Inc. safety manager, who is responsible for administering, coordinating, reviewing, and updating this policy at least annually.

Medical surveillance shall be provided when an employee is exposed to Hexavalent Chromium levels above the PEL for 30 days or more per year or if the 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 a physician or under the supervision of a physician or other licensed health care professional in accordance with OSHA 1910.1026 (k) (1)-1910.1026 (k) (l) (ii).

- Employees are to be notified within five working days, in writing, if they have identified unacceptable blood levels.

SCALES NW Inc. will maintain and make available an accurate record of all employee exposure monitoring, medical surveillance and training records in accordance with OSHA 1910.1026 (m).