

Frequently Asked Questions

- **Is special training required for center staff performing air sampling?** No. In accordance with PRH Chapter 5, Exhibit 5-4, all safety officers are required to complete the Occupational Safety and Health Administration (OSHA) course “Introduction to Industrial Hygiene,” which satisfactorily prepares the individual to conduct this type of sampling.
- **Is it acceptable to have a consultant conduct air monitoring?** Yes. Centers may wish to consult an industrial hygiene or environmental services firm (e.g., the contractor that conducts quarterly inspections) to perform air monitoring. However, centers are not required to hire an outside company to perform air monitoring to comply with Program Instruction No. 06-29.
- **Who will fund air sampling and analysis?** The National Office of Job Corps will not provide additional funding for this compliance requirement. This cost is covered in the center’s operating budget.
- **Is it possible to do representative sampling?** Yes. Do not sample all students, staff, and instructors. Representative sampling within a trade area is acceptable when students and staff sampled perform the same job or function under the same conditions. (Refer to Attachment A, Step 2.)

For example, there are 20 students enrolled in welding class. Select four students and the instructor to wear the sampling pump. At least one of the five individuals sampled is expected to have the highest Cr(VI) exposure. If the instructor teaches more than one class per day, he or she would be expected to have the highest exposure. The results of the samples apply to that representative group only. They cannot be applied to another trade or another classroom of students within the same trade.

- **Is it necessary to monitor each new student who enters a trade where the potential for exposure to Cr(VI) exists?** OSHA requires employers, i.e., centers, to perform additional air monitoring whenever employee or workplace changes occur that may result in new or additional exposures to Cr(VI). However,
 - a. if initial monitoring results indicate that exposures are below the PEL and action levels, and equipment and materials have not changed, additional monitoring for new students is not necessary;
 - b. if initial monitoring results indicate that exposures meet or exceed the action level, centers will monitor exposures twice a year or every 6 months. New students should be included in the representative samples; or

- c. if initial monitoring results indicate that exposures meet or exceed the PEL, centers shall monitor exposures quarterly or every 3 months. New students should be included in the representative samples.
- **Does OSHA provide guidance on administrative control measures?** Administrative controls, such as job rotation, are not accepted by OSHA under this standard, nor do they apply to the Job Corps training environment. The most effective engineering control suggested by OSHA is product substitution. Where possible, centers should substitute less toxic products and materials for Cr(VI)-containing products and materials. OSHA also suggests isolation and ventilation controls to reduce exposure. See Program Instruction No. 06-29, Attachment C, page 9, for additional information.
 - **How do we address student and staff concerns about perceived hazards associated with wearing a personal sampling pump?** Before initial sampling begins, the Center Director or his or her designee should provide students involved in the affected trades with information about Cr(VI), the associated hazards, and OSHA compliance requirements. Instructors should inform students that personal exposure monitoring is an accepted industry practice and is useful in establishing OSHA exposure standards. A demonstration of how the sampling pump operates and how it should be worn will help to ease fears about being recorded or exposed to toxic gases or fumes. The safety manager or collateral duty safety officer should allow the instructor to select students to wear the sampling pump. However, for the best results, the instructor should ask for volunteers before randomly selecting student participants.