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Standard Guide for Safety and Health Requirements Relating to Occupational Exposure to Water-Insoluble Chromates¹

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INTRODUCTION

This guide is intended to provide guidance in the safe handling of certain chromate compounds that are suspected to be carxcinogenic in man (1-8).² Precautions contained herein are believed to protect against possible carcinogenicity, and will also be sufficient to obviate any acute health hazards except where skin hypersensitivity is a factor. Other hazards are considered and discussed.

The time-weighted average (TWA) permissible exposure limit (PEL) specified in this guide are based on studies evaluated by the American Conference of Government Industrial Hygienists (ACGIH) (9). Epidemiological studies of the chromate producing industry have indicated that observed adverse health effects were associated with environmental levels and hygiene procedures considerably less exacting than those recommended here (see Appendix X1).

Hygiene controls and medical surveillance measures have been chosen to protect workers, recognizing that the potential for exposure will vary widely from industry to industry and between one location and another, depending on the compounds handled, scale of operations, kind of process, and physical conditions.

The key to maintaining chromate levels below the PEL is through implementation of cost effective engineering controls augmented as necessary by personal protective equipment, or work practice controls, or both. The choice of methods should depend upon the factors involved in each specific situation.

Biological monitoring is also recommended for lead chromate (see 7.4).

All applicable federal, state, county and local regulations must be complied with when this guide is used.

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1. Scope

- 1.1 This guide covers control procedures for the safe production, storage, transportation, and handling of only the hexavalent chromium compounds found in Table 1 and their various hydrates, and mixtures of coprecipitates of the same regardless of crystalline form.
- 1.2 This guide is not intended to cover (a) such "soluble" chromates as chromates of sodium, potassium, magnesium, or

ammonium; (b) soluble bichromates; (c) chromic acid; (d) volatile chromyl compounds; (e) any trivalent chromium compound; or (f) elemental chromium. Omission of said compounds or classes of compounds should not be construed to mean that they may be handled without due regard to their particular physical, chemical, and toxicological hazards (9, 10, 11)

- 1.3 The chromate ion, CrO_4^{-2} , depending upon the acidity, complexes to form di-, tri-, and higher polychromates; hence, the chromates listed in Table 1 may contain mixtures of polychromates, depending on the method of isolation and end use.
- 1.4 This standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of whoever uses this standard to consult and

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² The boldface numbers in parentheses refer to the references at the end of this guide.

TABLE 1 Examples of Some Hexavalent Chromium Compounds

Chemical Name	Formula	Color Index Name ^A
Barium chromate	BaCrO ₄	Pigment Yellow 31
Barium potassium chromate	BaK ₃ (CrO ₄) ₂	Pigment Yellow 31
Basic copper chromate	CuCrO ₄	Not listed
	xCu(OH) ₂	
Basic cadmium chromate	Cd ₂ (OH) ₂ CrO ₄	Pigment Yellow 44
Basic lead chromate	PbCrO ₄ PbO	Pigment Orange 21
Bismuth basic dichromate	Bi ₂ O ₃ CrO ₃	Pigment Red 103
Calcium chromate	CaCrO ₄	None assigned
"Chromic chromate"	xCaO yCr ₂ O ₃	Pigment Yellow 33
(calcium chromate sinter)	zCrO ₃	Not listed
Ferric chromate	Fe ₂ (CrO ₄) ₃	Pigment Yellow 45
Basic ferric chromate	Fe(OH)CrO ₄	Pigment Yellow 45
Lead chromate	PbCrO ₄	Pigment Yellow 34
Lead molybdochromate	PbCrO ₄ PbMoO ₄	Pigment Red 104
Potassium zinc chromate	K ₂ O 4ano·4Cr4O ₃	Pigment Yellow 36
Strontium chromate	SrCrO ₄	Pigment Yellow 32
Zinc chromate	ZnCrO₄	Pigment Yellow 36

AFor Classification, not Toxicology.

establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to use. (For more specific precautionary information see Section 5.)

2. Referenced Documents

- 2.1 ANSI Standards:
- Z87.1 Practice for Occupational and Educational Eye and Face Protection³
- Z88.2 Practices for Respiratory Protection³
- Z129.1 Precautionary Labeling for Hazardous Industrial Chemicals³
- 2.2 OSHA Standards:
- 29 CFR 1910.20 Access to Records⁴
- 29 CFR 1910.1200 Hazard Communication⁴
- 29 CFR 1910.134 Respiratory Protection⁴
- 29 CFR 1910.1025 Lead⁴
- 2.3 NIOSH Publications:
- "Certified Equipment," HEW Publication No. 76-1454
- "Recommended Industrial Ventilation Guidelines," January 1976, HEW Publication No. 76-162⁴
- "Criteria for a Recommended Standard Chromium (VI)," HEW Publication No. 76-129 $^{\,4}$

3. Terminology

- 3.1 Definitions of Terms Specific to This Standard:
- 3.1.1 *exposure area*—buildings and exterior locations where insoluble chromates may be present as airborne particulates in excess of the concentrations specified in 5.1.2, or where there is a likelihood of skin contact with chromate containing dust.
- 3.1.2 *insoluble*—a relative term to distinguish the low-water solubility of the chromates listed in Table 1 from the much more water-soluble chromates of sodium, potassium, and ammonia. The solubilities of lead chromates and calcium chromate are typical of the lower and upper solubilities of the class (see Section 6).

4. Significance and Use

4.1 This guide includes chromates that are not readily soluble in water and that have water solubilities (Chromate ION) within the range of the more soluble calcium chromate and the much less soluble lead chromate. The major occupations involving potential exposure to insoluble chromates are in roasting of chromite ore, the manufacture of chromate pigments, the manufacture of coatings containing chromate pigments, and spray painting with these coatings. There is insufficient evidence to conclude that trivalent chromium compounds are carcinogenic.

5. General Requirements

- 5.1 Environmental Levels:
- 5.1.1 The following guide is designed to protect the health and safety of workers for an 8 to 10-h workday, 40-h workweek, over a working lifetime. The PEL can be met by techniques and controls that reduce employee exposure below the applicable safe limit. These controls must be reliable. Permissible exposure limits are based on the 1985 ACGIH recommended Threshold Limit Values (TLV) for chromates of lead and zinc and for chromite-ore processing (12).⁵
- 5.1.2 *PEL*—Occupational exposure to any of the compounds listed in Table 1 shall be controlled to a TWA of 0.05 mg/m³ (as Chromium) for an 8-h workday.
- 5.1.3 At least one full-shift (80 % of the shift length) personal sample should be taken for each job classification and each work area involving insoluble chromates. These samples shall be representative of a monitored employee's regular daily exposure to insoluble chromates, and may be used to represent the exposure of all employees in that job assignment. One sample may not be sufficient for an adequate characterization. For further guidance and appropriate control objectives see 5.6, 6.2, and 7.3.
 - 5.2 Medical Surveillance: 2d8/93/astm-e848-942000
- 5.2.1 *Examinations*—Individuals who are currently, or who are expected to be employed in exposure areas (see 3.1) shall be given preplacement and annual medical examinations that shall include, but not necessarily be limited to the following:
- 5.2.1.1 *Work History*, to elicit information on all past exposures to any hexavalent chromium compounds or other toxic substances, particularly those affecting lung function.
- 5.2.1.2 *Periodic Medical Examination*, consisting of at least the following: Completion of a health history questionnaire with attention given to smoking history, posterior-anterior chest X-ray, complete blood count or red cell count and hemoglobin, and pulmonary function studies (FVC, FEV 1.0 and FEV 1.0/FVC).
- 5.2.2 Medical examinations shall be made available to workers with symptoms of skin or upper respiratory tract irritation at the time the symptoms are first observed or reported.
- 5.2.3 *Management*—Proper medical management shall be provided promptly for workers adversely affected by exposure to insoluble chromates. The cause of any excessive exposure

³ Available from American National Standards Institute, 1430 Broadway, New York, NY 10018.

⁴ Available from Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20402.

⁵ Committee on Industrial Ventilation, *Documentation of TLVs, American Conference of Governmental Industrial Hygienist*, 1985.

shall be sought without delay, and corrective action initiated. A physician shall determine if sensitized individuals should be excluded from jobs with a risk of exposure.

- 5.2.4 *First Aid*:
- 5.2.4.1 *Ingestion*—Induce vomiting promptly and obtain prompt medical attention. "Advice to physicians: Administer 500 to 1000 mg ascorbic acid IV as promptly as possible, followed by oral Vitamin C, 5 to 10 g/day until risk of kidney failure has ceased," (13).
- 5.2.4.2 *Chromium Contamination of Open Wounds*—Flush thoroughly for 15 min with water and seek medical attention.
- 5.2.4.3 *Eye Irritation*—Flush thoroughly with copious quantities of water for 15 min and seek medical attention.
 - 5.3 Labeling and Posting:
- 5.3.1 Warning Signs—In areas where insoluble chromate concentrations in the atmosphere are likely to exceed the standard, appropriate warning signs, barricades, or work practices should be used to restrict access to unauthorized persons. The sign must alert anyone entering the area as to what action should be taken.
- 5.3.2 *Container Labels*—All containers (bag, barrel, box, can, drum, reaction vessel, storage tanks, but not pipe or pipe lines) should be labeled, tagged, or marked with the following information:
- 5.3.2.1 *The Identity of the Material(s)* Identity means any chemical or common name(s), code name or number, or brand name, that is indicated on the material safety data sheet for the chemical.
- 5.3.2.2 Batch process sheets, batch tickets, operating procedures, or other such written materials are acceptable alternatives to individual labels as long as the appropriate identity is readily accessible to employees.
- 5.3.2.3 Portable containers for immediate use need not be labeled.
- 5.3.3 Material Safety Data Sheet (MSDS)—The MSDS or equivalent is the primary source of the safety and health information. The chemical identification and MSDS for all insoluble chromates used in the workplace must be made readily accessible to all employees. The MSDS in conjunction with the identity on the label and employee training will convey the hazard(s) (both physical and health) determination for the chromate compounds. Information on the MSDS must include:
 - 5.3.3.1 The OSHA PEL and the ACGIH TLV.
- 5.3.3.2 A statement to that effect if the chromate has been identified as a suspect carcinogen by the National Toxicology Program (NTP), the International Agency for Research on Cancer (IARC), OSHA, or the employer.
- 5.3.4 *Finished Product Labels*, are the responsibility of the manufacturer based on his knowledge of the end use of his unique products. However, the label should be in agreement with the recommendations of ANSI Z129. Any applicable governmental regulation must be followed.
 - 5.4 Personal Protective Equipment:
- 5.4.1 Respiratory Protection—Each employee's personal work environment shall be maintained at a safe exposure level through implementation of cost effective engineering controls, augmented as necessary by personal protective equipment or

- work practice controls, or both. The choice of method should depend on the factors involved in each specific situation. Two criteria should be used to guide the choice of the control measures. The measure chosen must reduce employee exposure below the applicable safe limit and the control method must be reliable (14, 15). With these two factors met, other factors such as logistics, product quality, economics, morale, housekeeping, and efficiency can then be incorporated into the decision logic for choosing appropriate control measures. Respirators are also required for emergencies and for the performance of nonroutine tests and duties that have the likelihood of exceeding the PEL. Brush or roller application of paints does not normally require respiratory protective equipment for protection from airborne chromates.
- 5.4.2 The Respiratory Protection Program must meet the general requirements outlined in OSHA 29 CFR 1910.134 and in ANSI Z88.2-1980, see Ref (16). This program shall include instructions on the proper selection and use, including fit testing, cleaning and maintenance of respirators and air supply devices. The fit test should be performed annually on all negative pressure respirators. Either a quantitative or qualitative test is satisfactory (14, 15). The type of respirator required for protection against known or expected concentration of airborne chromate to be encountered is outlined in Table 2.
- 5.4.3 Foot Protection—Industrial type leather shoes with synthetic soles will provide ample protection under normal operating and good housekeeping conditions. For wet operations during cleanup of spills or when conducting decontamination procedures, rubber or synthetic booties or pullover shoe protection shall be worn, and thoroughly rinsed and dried before reuse. Shoes that are torn or show evidence of inside contamination with chromate shall be disposed of properly.
- 5.4.4 *Clothing*—Any employee exposed to airborne levels of chromium above the PEL or when the possibility of skin or eye irritation exists, should be supplied with appropriate protective work clothing such as coveralls or similar full-body work clothes. See for example, ANSI Z87.1 for eye and face protection guidelines. Clean work clothing should be supplied at least weekly to employees in these cases. All protective clothing must be removed at the completion of each work shift in the change room provided for this purpose. Employees exposed to chromium above the PEL should shower at the end of the work shift. Employees must not wear or take any of the protective equipment off the work site. Care must be taken to prevent any cross contamination of street clothes.
- 5.4.5 Hand Protection—Suitable gloves to minimize skin contact shall be worn during operations where chromates are handled and may contact skin. Hands should be cleaned after removal of gloves. Gloves showing evidence of internal contamination shall be disposed of or thoroughly cleaned before reuse.
- 5.4.6 *Inspection*—All personal protective devices shall be inspected regularly and shall be maintained in clean and satisfactory working condition.
 - 5.5 Appraisal of Employees of Hazards (Communications):
- 5.5.1 *Education and Training*—All employees who are employed in an exposure area shall be advised of the following according to OSHA 29 CFR 1910.1200:

TABLE 2 Protection Factors for Particulate Filter Respirators

Note 1—This table is based on Refs (17, 18, 19) and ANSI Z88.2.

Concentrations in Multiples of Permissible Exposure Limits ^A	Face- Piece Pressure	Permissible Respirators
5×	_	Single-use dust
	-	Quarter-mask dust
10×	-	Half-mask dust ^B
	_	Half of quarter mask, fume
	-	Half or quarter mask, high efficiency
	-	Half mask, supplied air de- mand mode
50×	_	Full-face piece, high effi-
		ciency or dust, fume, mist
	-	Full-face piece, supplied air demand mode
	_	Self-contained breathing ap-
		paratus (SCBA) demand
		mode
1000×	+	Powered, high-efficiency, all
		enclosures ^D
	+	Half mask, supplied air,
		pressure-demand mode or
		continuous flow
2000×	+	Full-face piece, hood, hel-
		met, or suit; supplied air;
		pressure-demand mode or
		continuous flow
10 000×	+	Full-face piece, SCBA
		pressure-demand mode
	+	Full-face piece supplied air
		pressure-demand mode or
		continuous flow with auxiliary
F		self-contained air supply
Emergency entry into	+	Full-face piece, SCBA
unknown concentrations or		pressure demand mode
firefighting Escape only ^E		Any SCBA
Escape only	+	Any self rescuer
		Ally Sell lescuel

^AOther chemicals, for example, lead may be the controlling factor rather than chromate concentration.

- 5.5.1.1 Chemical names,⁶
- 5.5.1.2 Label identification system,
- 5.5.1.3 Work procedures,
- 5.5.1.4 Site and government standards,⁷
- 5.5.1.5 Potential health effects from both acute and chronic exposures, ⁶
 - 5.5.1.6 Relevance of medical exams,
- 5.5.1.7 Protective control measures used and new relevant information,

- 5.5.1.8 Exposure monitoring programs,
- 5.5.1.9 Employee responsibility for following procedures and using protective equipment, and
 - 5.5.1.10 Emergency procedures.
- 5.5.1.11 This information may be communicated and training achieved by any combination of oral or written individual or group methods which achieve understanding. Training should be repeated annually.
- 5.5.2 *Exposure Records*—Employees have the right to their exposure records and medical records under OSHA 29 CFR 1910.20.
 - 5.6 Work Practices and Engineering Controls:
- 5.6.1 *Housekeeping*—Spills shall be cleaned up promptly by vacuuming, or wet methods, or by absorption methods that will prevent airborne contamination. No dry sweeping shall be performed. Floors, equipment, stains, and other contactable surfaces that may accumulate chromate particulate fallout shall be maintained free of dust that may become airborne. Containers provided for chromate solid waste shall be labeled and covered in accordance with 5.3.2.
 - 5.6.2 Control of Hazards:
- 5.6.2.1 Engineering Design and Construction—In the planning and erection of new or modified manufacturing or handling facilities, the principles of industrial hygiene and safety should be systematically applied.
- 5.6.2.2 Ventilation—All operations that release dust, such as opening packages, sampling, taking aliquots, charging vessels, drying, sizing, mixing, discharging (packout), or cleanout shall be provided with appropriately designated local ventilation in accordance with ACGIH recommendations and applicable governmental regulations. Ventilation systems shall be subject to a preventive maintenance inspection program to ensure that hoods, ducts, fans, absorbers, draft controls, filters, alarms, and other components are structurally sound and in good working order. Periodic tests of duct pressures or flows, or both, shall be made to ensure that the ventilation is adequate (20).
- 5.6.3 Solid Waste Disposal—Solid waste containing insoluble chromates that have the potential for becoming airborne shall be stored in labeled and covered containers until disposal in accordance with applicable governmental agency regulations.
- 5.6.4 *Maintenance*—Equipment and instruments shall be kept in good repair. Pumps, vessels, and lines handling insoluble chromates shall be drained and washed out before repairs are made except where repairs can be made without exceeding the PEL.
- 5.6.5 Sanitation—Washing facilities, emergency showers, eye-flushing fountains, or appropriate washing facilities shall be provided and be easily accessible in areas where there is potential for skin or eye contact with insoluble hexavalent chromium dust or liquids. This equipment shall be frequently inspected, and maintained in good working condition. Contaminated clothing shall be held in containers until removed for decontamination or disposal. Arrangements for laundering or otherwise decontaminating work clothing shall ensure the protection of individuals involved in this work.
- 5.6.6 Statistical Control—Data resulting from air and biological monitoring can be subject to various errors such as

 $^{^{}B}$ Half-mask and quarter-mask respirators should not be used if the particulate matter causes eye irritation at the use concentration.

^CFull-face piece, supplied-air respirators should not be used in any atmosphere that is immediately dangerous to life or health unless it is equipped with an auxiliary self-contained air supply that can be operated in the positive-pressure mode.

^DRecent work by NIOSH would indicate a protection factor of 1000 may not be obtained. Consult your supplier.

Eln an atmosphere that is immediately dangerous to life or health.

⁶ These items should also be included on the Material Safety Data Sheets (MSDS).

⁷ NIOSH Manual of Analytical Methods, 3rd ed., U.S. Department of Health and Human Services, Public Health Service, Centers for Disease Control. National Institute for Occupational Safety and Health, Division of Physical Sciences and Engineering; Cincinnati, Ohio, 1990. Available from the Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20402.

TABLE 3 Physical and Chemical Properties of Insoluble Chromates

Chromate	Molecular Weight	Particle Density	Melting Point	Solubility in Water, ^A g/100 cm ³	Solubility Product, mol ² /L ²	Solubility in Dilute Acid
Barium potassium	563.52	4.50 (15°C)				
Barium	253.37	4.50 (15°C)		0.00034 (16°C) 0.004 (37°C)	$1.6 \times 10^{-10} (18^{\circ}\text{C})$	soluble
Basic cadmium	374.81			,		
Basic ferric	188.85					
Basic copper	variable compositions					
Basic lead	546.2					
Bismuth basic di-chromate	665.95					
Calcium	156.07			0.75 (37°C)		
Chromic (sinter)	variable compositions			0.13 (37°C) as Cr+6		soluble
Ferric	459.67					
Lead	323.10	6.12 (15°C)	844	$5.8 \times 10^{-6} (25^{\circ}\text{C})$		$1.77 \times 10^{-14} (18^{\circ}\text{C})$ soluble
Lead molybdochromate	variable compositions					
Potassium zinc	819.68					
Strontium	203.63	3.90 (15°C)		0.09 (37°C)		soluble
Zinc	181.37	3.40 (15°C)		0.21 (37°C)		soluble

^ASolubilities in water at 37°C were calculated on the basis of data given in Heuper, W. C., and Conway, W. D., *Chemical Carcinogenesis and Cancers*, C. C Thomas, Springfield, IL 1964, p. 397.

random sampling device errors, or random analytical errors, or both. These errors can be quantified and their effects minimized by the application of statistically based quality contol programs. Each analytical method should be consulted for appropriate details.

- 5.6.6.1 Another potential source of large error is due to the random interday and intraday fluctuations in airborne contaminant levels. These fluctuations are generally considered to be log-normal, and may result in erroneous conclusions unless properly considered.
- 5.6.6.2 An appropriate objective is to control each employee's exposure so that the maximum probability of exposure above the exposure limit is 5 %. A number of references can be used for guidance since this detail is beyond the scope of this practice (21, 22, 23).
- 5.6.7 *Containers*—All shipping, storage, or in-plant transport containers of insoluble chromates shall be labeled to identify the material.
 - 5.6.8 Safety (Fire and Explosion):
- 5.6.8.1 *Fire*—The chromates covered by this practice are nonflammable, but under favorable conditions some may have sufficient solubility in the presence of combustible materials to initiate combustion by local exothermic oxidation.
- 5.6.8.2 *Explosion*—None of the chromates covered by this practice are explosive even at elevated temperatures. Mixtures of insoluble chromates with readily oxidizable materials may be explosive.
 - 5.7 Recordkeeping:
- 5.7.1 All test results shall be recorded showing location, time and date of sample, and identity of employee in the case of personal or biological sampling. This information shall be retained for at least 30 years, and in the case of personal or biological sampling, results shall be kept for 40 years or at least 30 years after the termination of employment, whichever is longer.
- 5.7.2 Pertinent medical records, including results of clinical examinations, biological and biochemical analysis, roentgenograms, and dates of treatment or hospitalization, shall be

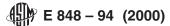
maintained in a secure and confidential manner for at least 30 years after termination of employment.

6. Physical and Chemical Properties

6.1 Selected physical and chemical properties of insoluble chromates are given in Table 3.

7. Monitoring Airborne and Biological Chromates

- 7.1 Personnel Monitoring—Breathing zone samples represent the most accurate measurement of employee exposure to airborne chromates. The sample is taken within a foot of the employee's face, and represents air inhaled by the employee. The sample may be obtained using a personal sampler attached to an individual or by a sampling device held within a foot of the face. An analytical method should be consulted for the necessary details such as collection device, flow rate, and the like.
- 7.2 Area Sampling—This is also known as fixed location sampling and is normally used to determine the maximum potential exposure, or to make a preliminary study of workplace conditions. An example is a continuous monitor.
- 7.3 Frequency—In applying this practice, preliminary investigation of all work operations should be made by an industrial hygienist or other qualified professional for the purposes of designating both frequency and location of air sampling devices and appropriate job assignments to be monitored.
- 7.4 *Biological Monitoring*—Blood and urinalysis for certain components have long been used for monitoring the effectiveness of programs designed to control worker exposure. Air and blood lead levels should be monitored as required in OSHA 29 CFR 1910.1025. Currently, when lead chromate is used or handled in any manner such that airborne lead levels exceed 30 µg/m³, it is essential that a blood-lead monitoring program be undertaken. Monitoring for other biochemical indicators may be useful in certain situations but until better correlation with blood lead levels is established, none are recommended. It is



noted that blood lead levels in excess of $50~\mu\text{g}/100~\text{g}$ of blood require worker removal from the area under the OSHA standard.

8. Analytical Test Methods

8.1 National Institute for Occupational Safety and Health, (NIOSH) published the following methods: 7024; 7200; 7300; 7600; 7604; 8005; and 8310. These methods should be consulted for advantages and disadvantages. (Such as separating CR III from CR VI).

8.2 Any analytical procedure that has been shown to possess equivalent or better sensitivity, reproducibility, and accuracy may be used to determine whether environmental levels are within the recommended standards.

9. Keywords

9.1 chromium; chromium based pigments; chromium compounds; exposure; health; hexavalent chromium; insoluble chromium; safety

APPENDIX

(Nonmandatory Information)

X1. EPIDEMIOLOGY AND TOXICOLOGY

X1.1 General

X1.1.1 This appendix is restricted to discussion of the epidemiology and toxicology of insoluble chromates as defined in Section 1. For a more thorough understanding, the original articles should be consulted.

X1.2 Early Studies

X1.2.1 Although chrome dermatitis, skin ulcers, and nasal septum perforations were reported as early as 1827 in Scotland and in 1933 in the United States, indications that chromates of some kind were a possible cause of bronchogenic carcinomas observed in chromate-producing plants first appeared in the German literature during the 1930s (1, 2, 24, 25, 26, 27). Following evidence in 1945, that a similar situation might be developing in the United States, the chromates industry sponsored literature and case studies that culminated in reports by Machle and Gregorius, by Baetjer, and by the U.S. Public Health Service (28, 29, 30, 31). These reports were in substantial agreement that the causative agents were associated with the lime-roasting phase of the production process. By this time, it was clear that most of the dermatitis, sensitization, and ulceration effects were due to exposures to chromic acid and the soluble chromates and causative agents. It is noted, lead chromate compounds have not been associated with sensitization or ulceration.

X1.2.2 The carcinogenicity of calcium chromate and sintered and roasted ore (containing calcium chromato chromite, misnamed "chromic chromate") was confirmed by animal studies: by Heuper in 1958 and 1959, Baetjer in 1959, and Payne in 1960 (32, 33, 34, 35, 36).

X1.3 Oral Toxicity and Metabolism

X1.3.1 Insoluble chromates, at rates dependent on their solubility, are either eliminated unchanged in the feces or reduced to trivalent chromium that is bound to protein (37). Rates of the later have three components with half-lives of 0.5, 5.9, and 83.4 days.

X1.3.2 Obviously, the oral toxicity of insoluble chromates is dependent on the nature of the cation, especially in the cases of lead chromate. A lethal dose, in man, of lead chromate as low

as 50 mg/kg was reported by Gleason, but Harrold found this compound was poorly absorbed by paint workers (29, 38). Gross found that rats and mice tolerate 1 % zinc chromate in their feed (39). Kennedy summarized the toxicity of lead chromates (40). The size of the dose required to produce effects varies considerably between pigments. The most adverse effects result from the availability of the lead cation.

X1.3.3 In most studies the compounds were administered by intravenous injection, a procedure considered irrelevant for the purpose at hand. At least for the more soluble of the chromate pigments, it is expected that excessive oral ingestion will result, as with the injected soluble chromates, in acute or chronic renal damage or failure, or both. Hunder found, for example, that 0.02 g/kg of potassium dichromate (as 2 % solution) was fatal to a monkey, producing acute renal lesions (41). Tandon reported elevated chromium levels in the urines of pigment handlers in Indian paint factories (42). Toxicity by the oral route has not been reported to be an occupational hazard.

X1.4 Skin and Eye Irritation

X1.4.1 The dermal irritancy and skin-sensitizing properties of the soluble chromates are well known and fully documented (43, 44). Less is known about the action of the insoluble chromates in these regards. However, since several of the chromate pigments have some limited solubility in moisture and therefore in perspiration, allergic skin reactions can occur in sensitized individuals. Walsh is of the opinion that once chromate sensitivity becomes established, there is apparently no "hardening" or increased tolerance to further exposures (45). Both Fisher and Engle have observed dermatitis in workers exposed to pain containing zinc chromate (46, 47). Calnan made a study of so called "cement dermatitis" and concluded that the presence of chromates was a possible cause (47). It seems likely, that any chromate present in cement would be largely in the form of calcium salt. Similarly, as reported by Fregert and Shelly, the chromium alleged to be a possible causative agent in dermatitis from welding fumes may be in the hexavalent form (48, 49). In any event, there is reason to believe that the more soluble chromate pigments may be