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DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS

DIRECTOR'S OFFICE

OCCUPATIONAL HEALTH STANDARDS

Filed with the Secretary of State on September 1, 1993 (as amended February 13, 1998)
(as amended April 5, 1999) **(as amended May 29, 2013)**

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(By authority conferred on the director of the department of licensing and regulatory affairs by sections 14 and 24
of 1974 PA 154, MCL 408.1014 and 408.1024; and Executive Reorganization Orders Nos. 1996-1, 1996-2,
2003-1, 2008-4, and 2011-4, MCL 330.3101, 445.2001, 445.2011, 445.2025 and 445.2030)

R 325.51851, R 325.51852, R 325.51854, R 325.51856, R 325.51859, R 325.51860, R 325.51862, R 325.51863,
R 325.51865, R 325.51866, R 325.51867, R 325.51868, R 325.51869, R 325.51873, R 325.51874, R 325.51879,
R 325.51880, R 325.51881, and R 325.51883 of the Michigan Administrative Code are amended,
R 325.51851a and R 325.51878a are added, and R 325.51885 and R 325.51886 are rescinded, as follows:

PART 309. CADMIUM

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R 325.51851. Scope and application.

Rule 1. (1) These rules apply to all occupational exposures to cadmium and cadmium compounds in all forms and in all industries and employment situations, including the construction industry, except as provided in subrule (2) of this rule.

(2) Some of these rules and subrules of these rules apply only to the construction industry or to general industry and agricultural operations, as indicated in the rules and subrules. If a specific application is not indicated in a rule or subrule, then the rule or subrule applies to general industry, agricultural operations, and the construction industry.

(3) The rule replaces all references to cadmium contained in Occupational Health Standards Part 301 "Air Contaminants for General Industry" and Part 601 "Air Contaminants for Construction," as referenced in R 325.51851a.

R 325.51851a. MIOSHA standards by reference.

Rule 1a. (1) The following Michigan occupational safety and health administration (MIOSHA) standards are referenced in these rules. Up to 5 copies of these standards may be obtained at no charge from the Michigan Department of licensing and regulatory affairs, MIOSHA standards section, 7150 Harris Drive, P.O. Box 30643, Lansing, MI, 48909-8143 or via the internet at website: www.michigan.gov/mioshastandards. For quantities greater than 5, the cost, at the time of adoption of these rules, is 4 cents per page.

(a) Administrative Part 11 "Recording and Reporting of Occupational Injuries and Illnesses," R 408.22101 to R 408.22162.

(b) Construction Safety Standard Part 1 "General Rules," R 408.40101 to R 408.40134.

(c) General Industry Safety Standard Part 1 "General Provisions," R 408.10001 to R 408.10098.

(d) General Industry Safety Standard Part 33 "Personal Protective Equipment," R 408.13301 to R 408.13398.

(e) Occupational Health Standard Part 301 "Air Contaminants for General Industry," R 325.51101 to R 325.51108.

(f) Occupational Health Part 430 "Hazard Communication," R 325.77001 to R 325.77003.

(g) Occupational Health Part 451 "Respiratory Protection," R 325.60051 to R 325.60052.

(h) Occupational Health Part 470 "Employee Medical Records and Trade Secrets," R 325.3451 to R 325.3476.

(i) Occupational Health Part 520 "Ventilation Control," R 325.52001 to R 325.52012.

(j) Occupational Health Part 601 "Air Contaminants for Construction," R 325.60151 to R 325.60161.

(k) Occupational Health Part 621 "Health Hazard Control for Specific Equipment and Operations for Construction," R 325.62102 to R 325.62126.

(2) Appendices, except where portions of Appendices A, B, D, E, and F to this rule are expressly incorporated in requirements of this rule; these appendices are purely informational and are not intended to create any additional obligations not otherwise imposed or to detract from any existing obligations.

R 325.51852. Definitions.

Rule 2. As used in these rules:

(1) "Action level" (AL) means an airborne concentration of cadmium of 2.5 micrograms per cubic meter of air (2.5 µg/ m3), calculated as an 8-hour, time-weighted average (TWA).

(2) "Authorized person" means a person who is authorized by an employer, and who is required by work duties, to be present in a regulated area, or a person who is authorized under Act No. 154 of the Public Acts of 1974, as amended, being §408.1001 et seq. of the Michigan Compiled Laws, and regulations issued under Act 154 to be in a regulated area for the purpose of conducting an authorized investigation.

(3) "Competent person" means a person who is designated by an employer to act on the employer's behalf, who is capable of identifying existing and potential cadmium hazards in the workplace and the proper methods to control the hazards to protect workers, and who has the authority necessary to take prompt corrective measures to eliminate or control such hazards. See R 325.51884 for the duties of a competent person.

(4) "Construction industry" means employers whose operations involve the construction, alteration, maintenance, repair, and demolition of a facility. Construction work includes any of the following:

(a) The wrecking, demolition, or salvage of structures where cadmium or materials that contain cadmium are present.

(b) The use of cadmium-containing paints and cutting, brazing, burning, grinding, or welding on surfaces that are painted with cadmium-containing paints.

(c) The construction, alteration, repair, maintenance, or renovation of structures, substrates, or portions thereof that contain cadmium or materials that contain cadmium.

(d) Cadmium welding or cutting of cadmium-plated steel and brazing or welding with cadmium alloys.

(e) The installation of products that contain cadmium.

(f) Electrical grounding with cadmium welding and electrical work using cadmium-coated conduit.

(g) Maintaining or retrofitting cadmium-coated equipment.

(h) Cadmium contamination cleanup and emergency operations that involve cadmium.

(i) The transportation, disposal, storage, or containment of cadmium or materials, that contain cadmium on the site or location at which construction activities are performed.

(5) “Director” means the director of the Michigan department of licensing and regulatory affairs or his or her designee.

(6) “Employee exposure” means the exposure to airborne cadmium that would occur if the employee were not using respiratory protective equipment.

(7) “Final medical determination” means the written medical opinion of the employee’s health status by the examining physician under R 325.51870 to R 325.51876, R 325.51877 if the review is by more than 1 physician, or R 325.51877(5) if the alternative physician determination is invoked. It is the final, written medical finding, recommendation, or determination that emerges from the medical surveillance process.

(8) “High-efficiency particulate air (HEPA) filter” means a filter that is capable of trapping and retaining not less than 99.97% of mono-dispersed particles that are 0.3 micrometers in diameter.

(9) “Regulated area” means an area which is demarcated by an employer and in which an employee’s exposure to airborne concentrations of cadmium exceeds, or can reasonably be expected to exceed, the permissible exposure limit (PEL).

R 325.51853. Permissible exposure limit (PEL).

Rule 3. An employer shall ensure that an employee is not exposed to an airborne concentration of cadmium in excess of 5 micrograms per cubic meter of air (5 ug/m3), calculated as an eight-hour, time-weighted average (TWA) exposure.

R 325.51854. Exposure monitoring generally.

Rule 4. (1) This subrule applies only to construction. Before performing of any construction work where employees may potentially be exposed to cadmium, an employer shall establish the applicability of these rules by determining whether cadmium is present in the workplace and whether there is the possibility that employee exposures will be at or above the action level. An employer shall designate a competent person to make this determination. Appropriate investigation and material testing techniques shall be used in making the determination. An investigation shall include all of the following:

(a) A review of relevant plans.

(b) A review of past reports relative to cadmium.

(c) Safety data sheets.

(d) Other available records.

(e) Consultations with the property owner.

(f) Discussions with appropriate individuals and agencies.

(2) An employer whose workplace or work operation involves cadmium in any way shall determine if any employee may be exposed to cadmium at or above the action level. An employer shall identify which employees potentially are exposed to cadmium at or above the action level and shall conduct exposure monitoring to determine what the exposure levels are.

(3) Determinations of employee exposure shall be made from breathing zone air samples that reflect the monitored employee’s regular, daily 8-hour TWA exposure to cadmium.

(4) Eight-hour TWA exposures shall be determined for each employee on the basis of 1 or more personal breathing zone air samples that reflect a full shift of exposure on each shift, for each job classification, in each work area. Where several employees perform the same job tasks, in the same job classification, on the same shift, and in the same work area and the length, duration, and level of cadmium exposures are similar, an employer may sample a representative fraction of the employees instead of all of the employees to meet this requirement. In representative sampling, an employer shall sample the employee who is expected to have the highest cadmium exposures.

(5) An employer shall use a method of monitoring and analysis that has an accuracy of not less than plus or minus 25%, with a confidence level of 95%, for airborne concentrations of cadmium at or above the action level, the permissible exposure limit (PEL), and the separate engineering control air limit (SECAL).

R 325.51855. Exposure monitoring; applicability of subrules (1), (2), (4), and (6).

Rule 5. (1) This subrule applies only to general industry and agricultural operations. Except as provided for in this subrule and subrule (3) of this rule, an employer shall monitor employee exposures and shall base initial determinations on the monitoring results. If an employer has monitored after September 14, 1991, under workplace conditions that, in all important aspects, closely resemble currently prevailing workplace conditions and if the monitoring satisfies all other requirements of R 325.51854, including the accuracy and confidence levels specified in subrule (5) of this rule, then an employer may rely on the earlier monitoring results to satisfy the requirements of this subrule.

(2) This subrule applies only to the construction industry. Except as provided for in subrule (3) of this rule, if a determination that is made in compliance with the provisions of R 325.51854(1) shows the possibility of employee exposure to cadmium at or above the action level, then an employer shall conduct exposure monitoring as soon as practicable that is representative of the exposure for each employee in the workplace who is or may be exposed to cadmium at or above the action level. In addition, if an employee periodically performs tasks that may expose the employee to a higher concentration of airborne cadmium, then the employee shall be monitored while performing the tasks.

(3) If an employer has objective data, as specified in R 325.51881(2), which demonstrate that employee exposure to cadmium will not exceed the action level under the expected conditions of processing, use, or handling, then an employer may rely upon the data instead of implementing the initial monitoring required by subrules (1) and (2) of this rule.

(4) This subrule applies only to the construction industry. If, pursuant to the provisions of R 325.51854(1) or R 325.51855(2), a determination of exposure is made that a potentially exposed employee is not exposed to airborne concentrations of cadmium at or above the action level, an employer shall make a written record of the determination. The record shall include at least the monitoring data that is developed pursuant to the provisions of subrules (2) and (3) of this rule, if applicable, and shall also include the name and social security number of each employee and the date of the determination.

(5) If the initial monitoring or periodic monitoring reveals employee exposures to be at or above the action level, then an employer shall monitor at a frequency and pattern needed to ensure that the monitoring results reflect, with reasonable accuracy, an employee's typical exposure levels given the variability in the tasks performed, work practices, and environmental conditions on the jobsite and to ensure the adequacy of respiratory protection selection and the effectiveness of engineering and work practice controls.

(6) This subrule applies only to general industry and agricultural operations. An employer shall perform the periodic monitoring that is described in subrule (5) of this rule at least once every 6 months until the conditions specified in subrule (7) of this rule are met.

(7) If the initial monitoring or the periodic monitoring indicates that an employee exposure is below the action level and that exposure is confirmed by the results of other monitoring that is performed not less than 7 days later, then an employer may discontinue the monitoring for employees whose exposures are represented by initial or periodic and other monitoring.

(8) An employer shall conduct exposure monitoring that is required by the provision of subrules (2) and (5) of this rule if any of the following situations occur:

(a) There has been a change in the raw materials, equipment, personnel, work practices, or finished products that may result in additional employees being exposed to cadmium at or above the action level.

(b) An employee who is presently exposed to cadmium at or above the action level becomes exposed above the PEL.

(c) An employer or competent person has any reason to suspect that any other change might result in an additional exposure.

R 325.51856. Employee notification of monitoring results.

Rule 6. (1) Not later than 15 working days for general industry and agricultural operations and not later than 5 working days for the construction industry, after an employer receives the results of any exposure monitoring that is performed pursuant to the provisions of these rules, an employer shall notify each affected employee individually in writing, or by posting the results in an appropriate location that is accessible to all affected employees.

(2) If monitoring results indicate that employee exposure exceeds the PEL, then an employer shall include, in the written notice, a statement that the PEL has been exceeded and a description of the corrective action that is being taken by the employer to reduce employee exposure to or below the PEL.

R 325.51857. Regulated areas.

Rule 7. (1) An employer shall establish a regulated area if an employee's exposure to airborne concentrations of cadmium is, or can reasonably be expected to be, in excess of the permissible exposure limit (PEL).

(2) Regulated areas shall be demarcated from the rest of the workplace in any manner that adequately establishes, and alerts employees to, the boundaries of the regulated area.

(3) Access to regulated areas shall be limited to authorized persons.

(4) Each person who enters a regulated area shall be supplied with, and required to use, a respirator that is selected in accordance with the provisions of R 325.51862(2).

(5) An employer shall ensure that employees do not eat, drink, smoke, chew tobacco or gum, or apply cosmetics in a regulated area; carry the products associated with these activities into a regulated area; or store such products in a regulated area.

R 325.51858. Engineering and work practice controls; written compliance program; applicability of rule to general industry and agricultural operations.

Rule 8. (1) This rule applies only to general industry and agricultural operations. Except as specified in subrules (2), (4), and (5) of this rule, an employer shall implement engineering and work practice controls to reduce and maintain employee exposure to cadmium at or below the PEL, unless, and to the extent that, the employer can demonstrate that the controls are not feasible.

(2) Except as specified in subrules (4) and (5) of this rule, for industries where a separate engineering control air limit (SECAL) is specified for the particular processes set forth in table 1, an employer shall implement engineering and work practice controls to reduce and maintain employee exposure at or below the specified SECAL, unless, and to the extent that, the employer can demonstrate that the controls are not feasible.

(3) Table 1 reads as follows:

TABLE 1
SEPARATE ENGINEERING CONTROL AIRBORNE LIMITS (SECAL)

INDUSTRY	PROCESS	SECAL (MICROGRAM CD/M^3 AIR)
Nickel cadmium battery	Platemaking, plate preparation. All other processes.	50 15
Zinc/cadmium refining*	Cadmium refining, casting, melting, oxide production, sinter plant.	50
Pigments manufacture	Calcine, crushing, milling, blending. All other processes.	50 15
Stabilizers*	Cadmium oxide charging, crushing, drying, blending	50
Lead smelting*	Sinter plant, blast furnace, baghouse, yard A reasonable rule	50
Plating*	Mechanical plating.	15
*Processes in these industries that are not specified in this table shall achieve the PEL using engineering controls and work practices as required in subrule (2) of this rule.		

(4) The requirement to implement engineering and work practice controls to achieve the PEL or SECAL, where applicable, does not apply if an employer can demonstrate both of the following:

(a) An employee is only intermittently exposed.

(b) An employee is not exposed above the PEL on 30 or more days per 12-consecutive-month period.

(5) If engineering and work practice controls are required and are not sufficient to reduce employee exposure to or below the PEL or SECAL, then an employer shall implement the controls to reduce exposures to the lowest levels achievable. The employer shall supplement the controls with respiratory protection that is in compliance with the provisions of R 325.51862 and R 325.51863 and the PEL.

(6) An employer shall not use employee rotation as a method of compliance.

(7) All of the following provisions apply to a written compliance program:

(a) If the PEL is exceeded, then an employer shall establish and implement a written compliance program to reduce employee exposure to or below the PEL by means of engineering and work practice controls, as required by subrules (1) and (2) of this rule.

(b) If engineering and work practice controls cannot reduce exposures at or below the PEL, then an employer shall include, in the written compliance program, the use of appropriate respiratory protection to achieve compliance with the PEL.

(c) A written compliance program shall include all of the following information:

(i) A description of each operation in which cadmium is emitted, including all of the following information, as appropriate:

(A) The machinery used.

(B) The material processed.

(C) The controls in place.

(D) The crew size.

(E) Employee job responsibilities.

(F) Operating procedures.

(G) Maintenance practices.

(ii) A description of the specific means that will be employed to achieve compliance, including engineering plans and studies that are used to determine the methods that are selected for controlling exposure to cadmium and, where necessary, the use of appropriate respiratory protection to achieve the PEL.

(iii) A report of the technology applicable to meeting the PEL.

(iv) Air monitoring data that document the levels and sources of cadmium emissions.

(v) A detailed schedule for implementation of the program, including documentation such as copies of purchase orders for equipment and copies of construction contracts.

(vi) A work practice program that includes items required by the provisions of R 325.51865 to R 325.51866.

(vii) A written plan for emergency situations, as specified in R 325.51864.

(viii) Other relevant information.

(d) A written compliance program shall be reviewed and updated at least annually, or more often if necessary, to reflect significant changes in the employer's compliance status.

(e) Upon request, a written compliance program shall be provided to affected employees, designated employee representatives, and the director for examination and copying.

R 325.51859. Engineering and work practice controls; applicability of rule to construction industry.

Rule 9. (1) This rule applies only to the construction industry. Except as specified in subrule (2) of this rule, an employer shall implement engineering and work practice controls to reduce and maintain employee exposure to cadmium at or below the PEL, unless, and to the extent that, the employer can demonstrate that the controls are not feasible.

(2) The requirement to implement engineering controls to achieve the PEL does not apply if an employer can demonstrate both of the following:

(a) The employee is only intermittently exposed.

(b) The employee is not exposed above the PEL on 30 or more days per 12-consecutive-month period.

(3) If engineering and work practice controls are not sufficient to reduce employee exposure at or below the PEL, an employer nonetheless shall implement the controls to reduce exposures to the lowest levels achievable. The employer shall supplement the controls with respiratory protection that is in compliance with the provisions of R 325.51862 and the PEL.

(4) An employer shall not use employee rotation as a method of compliance.

(5) All of the following provisions apply to the specific operations indicated:

(a) Abrasive blasting of cadmium or cadmium-containing materials shall be conducted in a manner that will provide adequate protection for employees.

(b) Welding, cutting, and other forms of heating cadmium or cadmium-containing materials shall be conducted in accordance with the requirements of Occupational Health Standard Part 621 "Health Hazard Control for Specific Equipment and Operations for Construction," as referenced in R 325.51851a, where applicable.

(c) High-speed abrasive disc saws and similar abrasive power equipment that is used for work on cadmium or cadmium-containing materials shall be equipped with appropriate engineering controls to minimize emissions to levels below the PEL.

(d) Materials that contain cadmium shall not be applied by spray methods if resulting exposures are above the PEL, unless employees are protected with supplied-air respirators which have full facepieces, hoods, helmets, and suits and which are operated in a positive pressure mode and, in addition, measures are instituted to limit overspray to prevent contamination of adjacent areas.

R 325.51860. Use of mechanical ventilation to control exposure to cadmium.

Rule 10. (1) If ventilation is used to control cadmium exposure, measurements that demonstrate the effectiveness of the system in controlling exposure, such as capture velocity, duct velocity, or static pressure, shall be made as necessary to ensure the ventilation system's effectiveness.

(2) Measurements of the system's effectiveness in controlling exposure shall be made as necessary within 5 working days of any change in production, process, or control that might result in a significant increase in employee exposure to cadmium.

(3) If air from exhaust ventilation is recirculated into the workplace, the system shall have a high-efficiency filter and be monitored to ensure effectiveness. Recirculation of local exhaust air shall be in compliance with the provisions of Occupational Health Standard Part 520 "Ventilation Control," as referenced in R 325.51851a.

(4) Procedures shall be developed and implemented to minimize employee exposure to cadmium when maintenance is performed on the ventilation systems and when filters are changed.

R 325.51861. Written compliance program; applicability of rule.

Rule 11. This rule applies only to the construction industry.

(a) Where employee exposure to cadmium exceeds the PEL and an employer is required by the provisions of R 325.51859(1) to implement controls to comply with the PEL, prior to beginning the job an employer shall establish and implement a written compliance program to reduce employee exposure at or below the PEL. To the extent that engineering and work practice controls cannot reduce exposures at or below the PEL, the employer shall include, in the written compliance program, the use of appropriate respiratory protection to achieve compliance with the PEL.

(b) A written compliance program shall be reviewed and updated as often and as promptly as necessary to reflect significant changes in an employer's compliance status or significant changes in the lowest air cadmium level that is technologically feasible.

(c) A competent person shall review the comprehensive compliance program initially and after each change.

(d) Upon request, a written compliance program shall be provided to the director, affected employees, and designated employee representatives for examination and copying.

R 325.51862.Respiratory protection; circumstances for use; selection.

Rule 12. (1) For employees who use respirators required by this rule, the employer shall provide each employee an appropriate respirator that comply with the requirements of this rule. Respirators must be used during all of the following:

(a) Periods necessary to install or implement feasible engineering and work practice controls when employee exposures exceeds the PEL.

(b) Maintenance and repair activities and brief or intermittent work operations for which employee exposures exceed the PEL and engineering and work practice controls are not feasible or are not required.

(c) Work operations in the regulated areas specified in R 325.51857.

(d) Work operations for which the employer has implemented all feasible engineering and work practice controls and such controls are not sufficient to reduce exposures to or below the PEL.

(e) Emergencies.

(f) Work operations for which an employee who is exposed to cadmium at or above the action level requests a respirator.

(g) Work operations for which engineering controls are not required by R 325.51859(2) to reduce employee exposures that exceed the PEL.

(2) The employer shall do all of the following:

(a) Select, and provide to employees, the appropriate respirators specified in paragraph (d)(3)(i)(A) of Occupational Health Standard Part 451 "Respiratory Protection," as referenced in R 325.51851a.

(b) Provide employees with full facepiece respirators when they experience eye irritation.

(c) Provide HEPA filters for powered and non-powered air-purifying respirators.

(3) An employer shall provide a powered, air-purifying respirator (PAPR) in place of a negative pressure respirator if an employee who is entitled to a respirator chooses to use this type of respirator and if a PAPR respirator will provide adequate protection to the employee.

R 325.51863. Respiratory protection program; fit testing.

Rule 13. (1) The employer shall implement a respiratory protection program in accordance with Occupational Health Standard Part 451 "Respiratory Protection," rules 1910.134(b) to (d) and (f) to (m), except for (d)(1)(iii), as referenced in R 325.51851a, which covers each employee required by this section to use a respirator.

(2) If an employee exhibits breathing difficulty during fit testing or respirator use, then the employer shall provide the employee with a medical examination under R 325.51868(2)(d) to determine if the employee can use a respirator while performing the required duties.

(3) An employee shall not use a respirator when, based on his or her most recent medical examination, the examining physician determines that the employee will be unable to continue to function normally while using a respirator. If the physician determines the employee must be limited in, or removed from, the employee's current job because of the employee's inability to use a respirator, then the employer shall conduct the job limitation or removal under R 325.51875 and R 325.51876.

R 325.51864. Emergency plan.

Rule 14. An employer shall develop and be prepared to implement a written plan for dealing with emergency situations that involve substantial releases of airborne cadmium. The plan shall include provisions for the use of appropriate respirators and personal protective equipment. In addition, employees who are not essential to correcting the emergency situation shall be restricted from the emergency area and normal operations halted in that area until the emergency is abated.

R 325.51865. Protective work clothing and equipment.

Rule 15. (1) If an employee is exposed to airborne cadmium above the PEL or if skin or eye irritation is associated with cadmium exposure at any level, then an employer shall provide, at no cost to the employee, and ensure that the employee uses, appropriate protective work clothing and equipment that prevents contamination of the employee and the employee's garments. Protective work clothing and equipment includes all of the following:

(a) Coveralls or similar full-body work clothing.

(b) Gloves, head coverings, and boots or foot coverings.

(c) Face shields, vented goggles, or other appropriate protective equipment that is in compliance with the provisions of General Industry Standard Part 33 "Personal Protective Equipment," as referenced in R 325.51851a.

(2) All of the following provisions pertain to the removal and storage of protective work clothing and equipment:

(a) An employer shall ensure that employees remove all protective clothing and equipment that is contaminated with cadmium at the completion of the work shift and that employees do so only in change rooms that are provided in accordance with the provisions of R 325.51866(2).

(b) An employer shall ensure that an employee does not take cadmium-contaminated protective clothing or equipment from the workplace, except for employees who are authorized to do so for purposes of laundering, cleaning, maintaining, or disposing of cadmium-contaminated protective clothing and equipment at an appropriate location or facility away from the workplace.

(c) An employer shall ensure that contaminated protective clothing and equipment, when removed for laundering, cleaning, maintenance, or disposal, is placed and stored in sealed, impermeable bags or other closed, impermeable containers that are designed to prevent the dispersion of cadmium dust.

(d) An employer shall assure that bags or containers of contaminated protective clothing and equipment that are to be taken out of the change rooms or the workplace for laundering, cleaning, maintenance, or disposal bear labels in accordance with the provisions of R 325.51879 of this rule.

(3) All of the following provisions pertain to the cleaning, replacement, and disposal of protective clothing and equipment:

(a) An employer shall provide the protective clothing and equipment required by subrule (1) of this rule in a clean and dry condition as often as necessary to maintain its effectiveness, but at least weekly. An employer is responsible for cleaning and laundering the protective clothing and equipment required by this rule to maintain its effectiveness and is also responsible for disposing of the clothing and equipment.

(b) An employer is responsible for repairing or replacing required protective clothing and equipment as needed to maintain its effectiveness. An employer shall ensure that rips or tears, which are detected while an employee is working are immediately mended or the worksuit shall be immediately replaced.

(c) An employer shall prohibit the removal of cadmium from protective clothing and equipment by blowing, shaking, or any other means that disperses cadmium into the air.

(d) An employer shall ensure that any laundering of contaminated clothing or cleaning of contaminated equipment in the workplace is done in a manner that prevents the release of airborne cadmium in excess of the PEL.

(e) An employer shall inform any person who launders or cleans protective clothing or equipment contaminated with cadmium of the potentially harmful effects of exposure to cadmium and that the clothing and equipment should be laundered or cleaned in a manner to effectively prevent the release of airborne cadmium in excess of the PEL.

R 325.51866. Hygiene areas and practices.

Rule 16. (1) An employer shall provide clean change rooms, handwashing facilities, showers, and lunchroom facilities that are in compliance with the provisions of General Industry Standard Part 1 “General Provisions,” or Construction Safety Standard Part 1 “General Rules,” as referenced in R 325.51851a, for employees whose airborne exposure to cadmium is above the PEL.

(2) An employer shall ensure that change rooms are equipped with separate storage facilities for street clothes and for protective clothing and equipment which are designed to prevent the dispersion of cadmium and contamination of the employee’s street clothes.

(3) Both of the following provisions pertain to showers and handwashing facilities:

(a) An employer shall ensure that employees who are exposed to cadmium above the PEL shower during the end of the work shift.

(b) An employer shall ensure that employees whose airborne exposure to cadmium is above the PEL wash their hands and faces before eating, drinking, smoking, chewing tobacco or gum, or applying cosmetics.

(4) Both of the following provisions pertain to lunchroom facilities:

(a) An employer shall ensure that lunchroom facilities are readily accessible to employees, that tables for eating are maintained free of cadmium, and that no employee in a lunchroom facility is exposed at any time to cadmium at or above a concentration of 2.5 µg/m3.

(b) An employer shall ensure that employees do not enter lunchroom facilities with protective work clothing or equipment unless surface cadmium has been removed from the clothing and equipment by HEPA filter vacuuming or some other method that removes cadmium dust without dispersing it.

R 325.51867. Housekeeping.

Rule 17. An employer shall comply with all of the appropriate following requirements pertaining to housekeeping:

(a) All surfaces shall be maintained as free as practical of the accumulation of cadmium.

(b) All spills and sudden releases of material that contains cadmium shall be cleaned up as soon as possible.

(c) Surfaces that are contaminated with cadmium shall, where possible, be cleaned by vacuuming or other method that minimizes the likelihood of cadmium becoming airborne.

(d) HEPA filter vacuuming equipment or equally effective filtration methods shall be used for vacuuming. The equipment shall be used and emptied in a manner that minimizes the reentry of cadmium into the workplace.

(e) Shoveling or dry or wet sweeping and brushing may be used only if vacuuming or other methods that minimize the likelihood of cadmium becoming airborne have been tried and found to be ineffective.

(f) Compressed air shall not be used to remove cadmium from any surface unless the compressed air is used in conjunction with a ventilation system that is designed to capture the dust cloud created by the compressed air.

(g) Waste scrap, debris, bags, containers, personal protective equipment, and clothing which is contaminated with cadmium and which is consigned for disposal shall be collected and disposed of in sealed impermeable bags or other closed, impermeable containers. The bags and containers shall be labeled in accordance with the provisions of R 325.51878a and R 325.51879, of this rule.

R 325.51868. Medical surveillance generally; applicability of subrules (1) and (2).

Rule 18. (1) This subrule applies only to general industry and agricultural operations. An employer shall institute a medical surveillance program as follows:

(a) For all employees who are or may be exposed to cadmium at or above the action level, unless the employer can demonstrate that the employee is not, and will not be, exposed at or above the action level on 30 or more days during a 12-consecutive-month period.

(b) For all employees who, before September 16, 1993, might previously have been exposed to cadmium at or above the action level by the employer, unless the employer can demonstrate that the employee, before September 16, 1993, did not work for the employer in jobs with exposure to cadmium for an aggregated total of more than 60 months.

(c) To determine an employee's fitness for wearing a respirator, an employer shall provide the limited medical examination specified by R 325.51873(1) and (2).

(2) This subrule applies only to the construction industry. An employer shall institute a medical surveillance program as follows:

(a) For all employees who are or may be exposed at or above the action level.

(b) For all employees who perform any of the following tasks, operations, or jobs:

(i) Electrical grounding with cadmium welding.

(ii) Cutting, brazing, burning, grinding, or welding on surfaces that are painted with cadmium containing paints.

(iii) Electrical work using cadmium-coated conduit.

(iv) Use of cadmium-containing paints.

(v) Cutting and welding cadmium-plated steel.

(vi) Brazing or welding with cadmium alloys.

(vii) Fusing of reinforced steel by cadmium welding.

(viii) Maintaining or retrofitting cadmium-coated equipment.

(ix) Wrecking and demolition where cadmium is present.

(c) For all employees who previously might have been exposed to cadmium by the employer before September 16, 1993, in tasks listed in subdivision (b) of this subrule, unless the employer can demonstrate that the employee, in the years before September 16, 1993, did not work in those tasks for the employer with exposure to cadmium for an aggregated total of more than 12 months.

(d) To determine an employee's fitness for wearing a respirator, an employer shall provide the limited medical examination specified by R 325.51873(1) and (2).

(e) A medical surveillance program is not required if an employer can demonstrate that both of the following provisions apply:

(i) An employee is not currently exposed by the employer to airborne concentrations of cadmium at or above the action level on 30 or more days during a 12-consecutive-month period.

(ii) An employee is not currently exposed by the employer in those tasks listed in subdivision (b) of this subrule on 30 or more days during a 12-consecutive-month period.

(3) An employer shall ensure that all medical examinations and procedures that are required by these rules are performed by or under the supervision of a licensed physician who has read, and is familiar with, all of the following:

(a) The health effects section of appendix A.

(b) The regulatory text of these rules.

(c) The protocol for sample handling and laboratory selection in appendix F.

(d) The questionnaire in appendix D. All medical surveillance, examinations, tests, and procedures shall be provided without cost to the employee and at a time and place that is reasonable and convenient for employees.

(4) An employer shall ensure that the collection and handling of biological samples of cadmium in urine (CdU), cadmium in blood (CdB), and beta-2 microglobulin in urine ($ß_2$-M) taken from employees is done in a manner that ensures the integrity and reliability of the samples and that analysis of the samples is performed in laboratories that have a demonstrated proficiency for the particular analyte. See appendix F.

R 325.51869. Initial medical examination.

Rule 19. (1) An employer shall provide an initial medical examination to all employees who are covered by the medical surveillance program required pursuant to the provisions of R 325.51868(1) or (2). The examination shall be provided to covered employees within 30 days after initial assignment to a job with exposure to cadmium or not later than 90 days after September 16, 1993, whichever date is later.

(2) The initial medical examination shall include both of the following elements:

(a) A detailed medical and work history, with an emphasis on all of the following:

(i) Past, present, and anticipated future exposure to cadmium.

(ii) Any history of renal, cardiovascular, respiratory, hematopoietic, reproductive, or musculoskeletal system dysfunction.

(iii) Current use of medication that has potential nephrotoxic side effects.

(iv) Smoking history and current status.

(b) Biological monitoring that includes all of the following tests:

(i) Cadmium in urine (CdU), standardized to grams of creatinine (g Cr).

(ii) Beta-2 microglobulin in urine (B2-M), standardized to grams of creatinine (g Cr) with Ph specified, as described in appendix F.

(iii) Cadmium in blood (CdB), standardized to liters of whole blood (lwb).

(3) An initial medical examination is not required to be provided if adequate records show that an employee has been examined in accordance with the requirements of subrule (2) of this rule within the past 12 months. If an employee has been examined in accordance with the requirements of subrule (2) of this rule within the past 12 months, the records shall be maintained as part of the employee's medical record and the exam shall be treated as if it were an initial medical examination for the purposes of R 325.51870 and R 325.51871.

R 325.51870. Initial biological monitoring; medical removal; applicability of subrules (4) and (5).

Rule 20. (1) If the results of the initial biological monitoring tests specified in R 325.51869(2)(b) show the employee's CdU level to be at or below 3 μg/g Cr, the $ß_2$- M level to be at or below 300 μg/g Cr, and the CdB level to be at or below 5 μg/lwb, then the employer shall comply with the following provisions, as applicable:

(a) For currently exposed employees who are subject to medical surveillance pursuant to the provisions of R 325.51868(1)(a) or (2)(a) and (b), an employer shall provide the minimum level of periodic medical surveillance in accordance with the requirements in R 325.51871.

(b) For previously exposed employees who are subject to medical surveillance pursuant to the provisions of R 325.51868(1)(b) or (2)(c), an employer shall provide biological monitoring for CdU, ß2-M, and CdB 1 year after the initial biological monitoring and then the employer shall comply with the requirements of R 325.51871(4).

(2) For all employees who are subject to medical surveillance pursuant to the provisions of R 325.51868(1) or (2), if the results of the initial biological monitoring tests show the level of CdU to be more than 3 μg/g Cr, the level of ß2-M to be more than 300 μg/g Cr, or the level of CdB to be more than 5 μg/lwb, then an employer shall comply with all of the following provisions:

(a) Within 2 weeks after receipt of biological monitoring results, reassess the employee's occupational exposure to cadmium as follows:

(i) Reassess the employee's work practices and personal hygiene.

(ii) Reevaluate the employee's respirator use, if any, and the respirator program.

(iii) Review the hygiene facilities required pursuant to the provisions of R 325.51866.

(iv) Reevaluate the maintenance and effectiveness of the relevant engineering controls.

(v) Assess the employee's smoking history and status.

(b) Within 30 days after the exposure reassessment specified in subdivision (a) of this subrule, take reasonable steps to correct any deficiencies found in the reassessment that may be responsible for the employee's excess exposure to cadmium.

(c) Within 90 days after receipt of biological monitoring results, provide a full medical examination to the employee in accordance with the requirements of R 325.51871(2). After completing the medical examination, the examining physician shall determine, in a written medical opinion, whether to medically remove the employee. If the physician determines that medical removal is not necessary, then until the employee's CdU level falls to or below 3 μg/g Cr, the ß2-M level falls to or below 300 μg/g Cr, and the CdB level falls to or below 5 μg/lwb, an employer shall do both of the following:

(i) Provide biological monitoring in accordance with the provisions of R 325.51869(2)(b) on a semiannual basis.

(ii) Provide annual medical examinations in accordance with the provisions of R 325.51871(2).

(3) For all employees who are subject to medical surveillance pursuant to the provisions of R 325.51868(1) or (2), if the results of the initial biological monitoring tests show the level of CdU to be more than 15 μg/g Cr, or the level of CdB to be more than 15 μg/lwb, or the level of ß2- M to be more than 1,500 μg/g Cr, then an employer shall comply with the requirements of subrule (2)(a) and (b) of this rule. Within 90 days after receipt of biological monitoring results, the employer shall provide a full medical examination to the employee in accordance with the requirements of R 325.51871(2). After completing the medical examination, the examining physician shall determine, in a written medical opinion, whether to medically remove the employee. However, if the initial biological monitoring results and the biological monitoring results obtained during the medical examination both show the level of CdU to be more than 15 μg/g Cr, the level of CdB to be more than 15 μg/lwb, or the level of ß2-M to be more than 1500 μg/g Cr and, in addition, the level of CdU is more than 3 μg/g Cr or CdB is more than 5 μg/lwb, then the physician shall medically remove the employee from exposure to cadmium at or above the action level. If the second set of biological monitoring results obtained during the medical examination does not show that a mandatory removal trigger level has been exceeded, then the employee is not required to be removed by the mandatory provisions of this subrule.

If the employee is not required to be removed by the mandatory provision of this subrule or by the physician's determination, then until the employee's CdU level falls to or below 3 μg/g Cr, the ß2-M level falls at or below 300 μg/g Cr, and the CdB level falls at or below 5 μg/lwb, an employer shall do all of the following:

(a) Periodically reassess the employee's occupational exposure to cadmium.

(b) Provide biological monitoring in accordance with the provisions of R 325.51869(2)(b) on a quarterly basis.

(c) Provide semiannual medical examinations in accordance with the provisions of R 325.51871(2).

(4) This subrule applies only to general industry and agricultural operations. Beginning on January 1, 1999, for all employees to whom medical surveillance is provided, an employer shall comply with all of the following provisions rather than subrules (1) to (3) of this rule:

(a) If the results of the initial biological monitoring tests show the employee's CdU level to be at or below 3 μg/g Cr, the ß2-M level to be at or below 300 μg/g Cr, and the CdB level to be at or below 5 μg/lwb, then, for currently exposed employees, an employer shall comply with the requirements of subrule (1)(a) of this rule, and, for previously exposed employees, the employer shall comply with the requirements of subrule (1)(b) of this rule.

(b) If the results of the initial biological monitoring tests show the level of CdU to be more than 3 μg/g Cr, the level of ß2-M to be more than 300 μg/g Cr, or the level of CdB to be more than 5 μg/lwb, then an employer shall comply with the requirements of subrule (2) of this rule.

(c) If the results of the initial biological monitoring tests show the level of CdU to be more than 7 μg/g Cr, or the level of CdB to be more than 10 μg/lwb, or the level of ß2-M to be more than 750 μg/g Cr, then an employer shall do all of the following, if applicable:

(i) Comply with the requirements of subrule (2)(a) and (b) of this rule and, within 90 days after receipt of biological monitoring results, provide a full medical examination for the employee in accordance with the requirements of R 325.51871(2).

(ii) After completing the medical examination, the examining physician shall determine, in a written medical opinion, whether to medically remove the employee.

(iii) If the initial biological monitoring results and the biological monitoring results obtained during the medical examination both show that the level of CdU is more than 7 μg/g Cr, the level of CdB is more than 10 μg/lwb, or the level of ß2-M is more than 750 μg/g Cr and, in addition, the level of CdU is more than 3 μg/g Cr or the level of CdB is more than 5 μg/lwb, then the physician shall medically remove the employee from exposure to cadmium at or above the action level.

(iv) If the second set of biological monitoring results obtained during the medical examination does not show that a mandatory removal trigger level has been exceeded, then the employee is not required to be removed by the mandatory provisions of this subrule.

(v) If the employee is not required to be removed by the mandatory provisions of this subrule or by the physician's determination, then until the employee's CdU level falls at or below 3 μg/g Cr, the ß2-M level falls to or below 300 μg/g Cr, and the CdB level falls to or below 5 μg/lwb, an employer shall do all of the following:

(A) Periodically reassess the employees's occupational exposure to cadmium.

(B) Provide biological monitoring in accordance with the provisions of R 325.51869(2) every 3 months.

(C) Provide semiannual medical examinations in accordance with the provisions of R 325.51871(2).

(5) This subrule applies only to the construction industry. Beginning on January 1, 1999, for all employees to whom medical surveillance is provided, an employer shall comply with all of the following provisions rather than the provisions of subrules (1) to (3) of this rule:

(a) If the results of initial biological monitoring tests show the employee's CdU level to be more than 7μg/g Cr, or the ß2-M level to be more than 750 μg/g Cr, or the CdB level to be more than 10 μg/lwb, an employer shall comply with the requirements of subrule (2) of this rule.

(b) Within 90 days after receipt of biological monitoring results, an employer shall provide a full medical examination to the employee in accordance with the requirements of R 325.51871(2).

(c) After completing the medical examination, the examining physician shall determine, in a written medical opinion, whether to medically remove the employee.

(d) If the initial biological monitoring results and the biological monitoring results obtained during the medical examination both show that the level of CdU is more than 7 μg/g Cr, the level of CdB is more than 10 μg/lwb, or the level of ß2-M is more than 750 μg/ g Cr and, in addition, the level of CdU is more than 3 μg/g Cr or the level of CdB is more than 5 μg/lwb, then the physician shall medically remove the employee from exposure to cadmium at or above the action level.

(e) If the second set of biological monitoring results obtained during the medical examination does not show that a mandatory removal trigger level has been exceeded, then the employee is not required to be removed by the mandatory provisions of this subrule.

(f) If the employee is not required to be removed by the mandatory provisions of this subrule or by the physician's determination, then until the employee's CdU level falls to or below 3 μg/g Cr, the ß2-M level falls to or below 300 μg/g Cr, and the CdB level falls to or below 5 μg/lwb, an employer shall do all of the following:

(i) Periodically reassess the employee's occupational exposure to cadmium.

(ii) Provide biological monitoring in accordance with the provisions of R 325.51869(2) every 3 months.

(iii) Provide semiannual medical examinations in accordance with the provisions of R 325.51871(2).

R 325.51871. Periodic medical examinations.

Rule 21. (1) For each employee who is covered by the provisions of R 325.51868(1)(a) or (2)(a) and (b) because of current or anticipated exposure to cadmium, an employer shall provide at least a minimum level of periodic medical surveillance that consists of periodic medical examinations and periodic biological monitoring. A periodic medical examination shall be provided within 12 months after the initial examination that is required pursuant to the provisions of R 325.51869 and not more than once every 24 months thereafter. Biological sampling shall be provided every 12 months either as part of a periodic medical examination or separately as periodic biological monitoring.

(2) A periodic medical examination shall include all of the following:

(a) A detailed medical and work history, or update thereof, with an emphasis on all of the following:

(i) Past, present, and anticipated future exposure to cadmium.

(ii) Smoking history and current status.

(iii) Reproductive history.

(iv) Current use of medications with potential nephrotoxic side effects.

(v) Any history of renal, cardiovascular, respiratory, hematopoietic, or musculo-skeletal system dysfunction.

(vi) For employees who wear respirators, answers to questions 3 to 11 and 25 to 32 in appendix D to these rules.

(b) A complete physical examination with an emphasis on blood pressure, the respiratory system, and the urinary system.

(c) A posterior-anterior chest X ray. After the initial X ray, the frequency of chest X rays shall be determined by the examining physician.

(d) Pulmonary function tests, including forced vital capacity (FVC) and forced expiratory volume at 1 second (FEV1).

(e) Biological monitoring, as required by the provisions of R 325.51869(2).

(f) Additional blood analyses, including blood urea nitrogen, complete blood count, and serum creatinine.

(g) Additional urinalysis, including the determination of albumin, glucose, and total and low molecular weight proteins.

(h) For males over 40 years of age, prostate palpation or other diagnostic test that is at least as effective.

(i) Any additional tests that are deemed appropriate by the examining physician.

(3) Periodic biological monitoring shall be performed in accordance with the provisions of R 325.51869(2)(b). If the results of periodic biological monitoring or the results of biological monitoring performed as part of the periodic medical examination show the level of the employee's CdU, ß2-M, or CdB to be more than the levels specified in R 325.51870(2) or (3) or, beginning on January 1, 1999, more than the levels specified in R 325.51870(2), (4), or (5), an employer shall take the appropriate actions specified in R 325.51870(2) to (5).

(4) For previously exposed employees as specified by the provisions of R 325.51868(1)(b) or (2)(c), all of the following provisions apply:

(a) If the employee's level of CdU was not more than 3 μg/g Cr, CdB was not more than 5 μg/lwb, and ß2- M was not more than 300 μg/g Cr in the initial biological monitoring tests, and if the results of the follow-up biological monitoring required by R 325.51870(1)(b) 1 year after the initial examination confirms the previous results, an employer may discontinue all periodic medical surveillance for that employee.

(b) If the initial biological monitoring results for CdU, CdB, or ß2-M were more than the levels specified in subdivision (a) of this subrule, but subsequent biological monitoring results required by the provisions of R 325.51870(2) to (5) show that the employee's CdU level is not more than 3 μg/g Cr, the CdB level is not more than 5 μg/lwb, and ß2-M level is not more than 300 μg/g Cr, an employer shall provide follow-up biological monitoring for CdU, CdB, and ß2-M 1 year after the most recent biological monitoring results. If the results of this follow-up biological monitoring confirm the previous results, an employer may discontinue all periodic medical surveillance for that employee.

(c) If the results of the follow-up tests specified in subdivision (a) or (b) of this subrule indicate that the level of the employee's CdU, ß2-M, or CdB is more than the levels specified in subdivision (b) of this subrule, an employer is required to provide annual medical examinations in accordance with the provisions of subrule (2) of this rule until the results of biological monitoring are consistently below the levels specified in subdivision (b) of this subrule or until the examining physician determines, in a written medical opinion, that further medical surveillance is not required to protect the employee's health.

(5) A routine, once every 24 months, medical examination is not required to be provided in accordance with the provisions of R 325.51870(1) and subrule (1) of this rule if adequate medical records show that the employee has been examined in accordance with the requirements of subrule (2) of this rule within the past 12 months. In that case, the records shall be maintained by the employer as part of the employee's medical record and the next routine, periodic medical examination shall be made available to the employee within 2 years of the previous examination.

R 325.51872. Actions triggered by medical examinations; applicability of subrules (1) and (2).

Rule 22. (1) This subrule applies only to general industry and agricultural operations. If the results of a medical examination carried out in accordance with these rules indicate any laboratory or clinical finding consistent with cadmium toxicity that does not require employer action required by R 325.51869 to R 325.51871, then an employer shall, within 30 days, reassess the employee's occupational exposure to cadmium and take all of the following corrective actions until the physician determines they are no longer necessary:

(a) Periodically reassess all of the following:

(i) The employee's work practices and personal hygiene.

(ii) The employee's respirator use.

(iii) The employee's smoking history and status.

(iv) The respiratory protection program.

(v) The hygiene facilities.

(vi) The maintenance and effectiveness of the relevant engineering controls.

(b) Within 30 days after the reassessment, take all reasonable steps to correct the deficiencies found that may be responsible for the employee's excess exposure to cadmium.

(c) Provide medical reexaminations every 6 months to evaluate the abnormal clinical signs of cadmium toxicity until the results are normal or the employee is medically removed.

(d) If the results of tests for total proteins in urine are abnormal, provide a more detailed medical evaluation of the toxic effects of cadmium on the employee's renal system.

(2) This subrule applies only to the construction industry. If the results of a medical examination carried out in accordance with these rules indicate any laboratory or clinical finding consistent with cadmium toxicity that does not require employer action required by R 325.51869 to R 325.51871, an employer shall take all of the following actions and continue to take them until the physician determines that they are no longer necessary:

(a) Periodically reassess all of the following:

(i) The employee's work practices and personal hygiene.

(ii) The employee's respirator use.

(iii) The employee's smoking history and status.

(iv) The respiratory protection program.

(v) The hygiene facilities.

(vi) The maintenance and effectiveness of the relevant engineering controls. The employer shall take all reasonable steps to correct the deficiencies discovered by this reassessment that may be responsible for the employee's excess exposure to cadmium.

(b) Provide medical reexaminations every 6 months to evaluate the abnormal clinical signs of cadmium toxicity until the results are normal or the employee is medically removed.

(c) If the results of tests for total proteins in urine are abnormal, provide a more detailed medical evaluation of the toxic effects of cadmium on the employee's renal system.

R 325.51873. Medical exams for fitness to use respirators, for exposure due to emergency, and at termination.

Rule 23. (1) To determine an employee's fitness for respirator use, an employer shall provide a medical examination that includes the elements specified in this subrule. The examination shall be provided before an employee is assigned to a job that requires the use of a respirator or not more than 90 days after September 16, 1993, whichever date is later, to any employee who has not had a medical examination within the preceding 12 months that satisfies the requirements of this subrule. The medical exam shall include all of the following:

(a) A detailed medical and work history, or update thereof, with an emphasis on all of the following:

(i) Past exposure to cadmium.

(ii) Smoking history and current status.

(iii) Any history of renal, cardiovascular, respiratory, hematopoietic, or musculo-skeletal system dysfunction.

(iv) A description of the job for which the respirator is required.

(v) Answers to questions 3-11 and 25-32 in appendix D to these rules.

(b) A blood pressure test.

(c) Biological monitoring of the employee's levels of CdU, CdB, and ß2-M in accordance with the requirements of R 325.51869(2)(b), unless the results have been obtained within the previous 12 months.

(d) Any other test or procedure that the examining physician deems appropriate.

(2) All of the following provisions pertain to the medical examination for respirator use:

(a) After reviewing all of the information obtained from the medical examination required in subrule (1) of this rule, the physician shall determine whether the employee is fit to wear a respirator.

(b) If an employee has exhibited difficulty in breathing during a respirator fit test or during use of a respirator, an employer shall provide the employee, as soon as possible, with a periodic medical examination in accordance with the provisions of R 325.51871(2) to determine the employee's fitness to wear a respirator.

(c) If the results of the examination required by subrule (1) of this rule or subdivision (a) or (b) of this subruleare abnormal, the medical limitation or prohibition of respirator use shall be considered. If the employee is allowed to wear a respirator, the employee's ability to continue to do so shall be periodically evaluated by a physician.

(3) In addition to the medical surveillance required by the provisions of R 325.51869 to R 325.51873(2), an employer shall provide a medical examination, as soon as possible, to any employee who may have been acutely exposed to cadmium because of an emergency. The examination shall include the information required pursuant to the provisions of R 325.51871(2), with an emphasis on the respiratory system, other organ systems considered appropriate by the examining physician, and symptoms of acute overexposure, as reviewed in appendix A to these rules.

(4) At termination of employment, an employer shall provide a medical examination in accordance with the provisions of R 325.51871(2), including a chest X ray where necessary, to any employee to whom, at any prior time, an employer was required to provide medical surveillance pursuant to the provisions of R 325.51868(1) or subrule (3) of this rule. However, if the last examination satisfied the requirements of R 325.51871(2) and was less than 6 months before the date of termination, then another examination is not required unless otherwise specified by the provisions of R 325.51870 or R 325.51872(1) or (2). If the employer has discontinued all periodic medical surveillance as provided by the provisions of R 325.51871(4), the termination of employment medical examination is not required.

R 325.51874. Provision of information to physician by employer; employer required to obtain medical opinion; employer required to obtain results of biological monitoring; findings unrelated to cadmium exposure.

Rule 24. (1) An employer shall provide all of the following information to an examining physician:

(a) A copy of these rules and appendices.

(b) A description of an affected employee's former, current, and anticipated duties as they relate to the employee's occupational exposure to cadmium.

(c) An employee's former, current, and anticipated future levels of occupational exposure to cadmium.

(d) A description of any personal protective equipment, including respirators, that were used or are to be used by the employee, including the date of use and the length of time that the employee has used that equipment.

(e) The results of previous biological monitoring and medical examinations that are relevant to the employee.

(2) An employer shall promptly obtain a written, medical opinion from the examining physician for each medical examination performed on each employee. The written opinion shall contain all of the following information:

(a) The physician's diagnosis for the employee.

(b) The physician's opinion as to whether the employee has any detected medical condition that would place the employee at an increased risk of material impairment to health from further exposure to cadmium, including any indications of potential cadmium toxicity.

(c) The results of any biological or other testing or related evaluations that directly assess the employee's absorption of cadmium.

(d) Any recommended removal from, or limitation on, the activities or duties of the employee or on the employee's use of personal protective equipment including respirators.

(e) A statement that the physician has clearly and carefully explained to the employee the results of the medical examination, including all biological monitoring results and any medical conditions related to cadmium exposure that require further evaluation or treatment, and any limitation on the employee's diet or use of medications.

(3) An employer promptly shall obtain a copy of the results of any biological monitoring that is provided to an employee by requirements other than those of a medical examination required by the provisions of R 325.51869 and R 325.51871 and, if there is no written medical opinion, shall obtain an explanation sheet explaining the results.

(4) An employer shall instruct the physician not to reveal orally or in the written medical opinion that is given to the employer specific findings or diagnoses unrelated to an occupational exposure to cadmium.

R 325.51875. Medical removal protection (MRP); applicability of subrule (1)(d) and (e).

Rule 25. (1) All of the following provisions pertain to the removal of an employee from work that exposes the employee to cadmium:

(a) An employer shall temporarily remove an employee from work if the exposure level exceeds the action level on each occasion that medical removal is required by the provisions of R 325.51870, R 325.51871, or R 325.51873(1) and (2) and on each occasion that a physician determines, in a written medical opinion, that the employee should be removed from such exposure. The physician's determination may be based on any of the following factors:

(i) Biological monitoring results.

(ii) Inability to wear a respirator.

(iii) Evidence of illness.

(iv) Other signs or symptoms of cadmium-related dysfunction or disease.

(v) Any other reason deemed medically sufficient by the physician.

(b) An employer shall medically remove an employee in accordance with the provisions of subdivision (a) of this subrule regardless of whether or not a job is available into which the removed employee may be transferred.

(c) If an employee is medically removed pursuant to the provisions of this subrule, then an employer shall transfer the removed employee to a job where the exposure to cadmium is at or below the permissible levels specified in this subrule as soon as a job becomes available.

(d) This subdivision applies only to general industry and agricultural operations. For an employee who is medically removed pursuant to the provisions of subdivision (a) of this subrule, an employer shall provide follow-up biological monitoring in accordance with the provisions of R 325.51869(2)(b) at least once every 3 months and follow-up medical examinations at least once every 6 months until, in a written medical opinion, the examining physician determines that either the employee may be returned to his or her former job status as specified pursuant to the provisions of subrules (3) and (4) of this rule or the employee must be permanently removed from excess cadmium exposure.

(e) This subdivision applies only to the construction industry. For any employee who is medically removed pursuant to the provisions of subdivision (a) of this subrule, an employer shall provide follow-up medical examinations once every 6 months until, in a written medical opinion, the examining physician determines that either the employee may be returned to his or her former job status or the employee must be permanently removed from excess cadmium exposure.

(f) An employer shall not return an employee who has been medically removed for any reason to his or her former job status until a physician determines, in a written medical opinion, that continued medical removal is no longer necessary to protect the employee's health.

(2) If an employee is found to be unfit to wear a respirator pursuant to the provisions of R 325.51873(2)(a), then an employer shall remove the employee from work if exposure to cadmium is above the PEL. If removal is based on any reason other that the employee's inability to wear a respirator, then an employer shall remove the employee from work if exposure to cadmium is at or above the action level.

(3) Except as specified in subrule (4) of this rule, an employee who was removed because his or her level of CdU, CdB, or ß2-M exceeded the medical removal trigger levels in R 325.51870 and R 325.51871 shall not be returned to work if there is an exposure to cadmium at or above the action level until the employee's level of CdU falls to or below 3 μg/g Cr, the level of CdB falls to or below 5 μg/lwb, and the level of ß2-M falls to or below 300 μg/g Cr.

(4) If in the examining physician's opinion continued exposure to cadmium will not pose an increased risk to the employee's health and there are special circumstances that make continued medical removal an inappropriate remedy, the physician shall fully discuss these matters with the employee and then, in a written determination, may return a worker to his or her former job status despite what would otherwise be unacceptably high biological monitoring results. Thereafter, the returned employee shall continue to be provided with medical surveillance as if he or she was still on medical removal until the employee's level of CdU falls to or below 3 μg/g Cr, the level of CdB falls to or below 5 μg/lwb, and the level of ß2-M falls to or below 300 μg/g Cr. Until these biological monitoring levels are achieved, the employee is not subject to mandatory medical removal. Subsequent questions regarding the employee's medical removal shall be decided solely by a final medical determination.

(5) If an employer, although not required by the provisions of subrules (1) and (2) of this rule to do so, removes an employee from exposure to cadmium or otherwise places limitations on an employee due to the effects of cadmium exposure on the employee's medical condition, then the employer shall provide the same medical removal protection benefits to that employee, as required by R 325.51876, as would have been provided had the removal been required by the provisions of this rule.

R 325.51876. Medical removal protection benefits (MRPB).

Rule 26. (1) An employer shall provide MRPB for up to a maximum of 18 months to an employee each time and while the employee is temporarily medically removed pursuant to the provisions of R 325.51875.

(2) For the purposes of these rules, the requirement that an employer provide MRPB means that the employer shall maintain the total normal earnings, seniority, and all other employee rights and benefits of the removed employee, including the employee's right to his or her former job status, as if the employee had not been removed from the employee's job or otherwise medically limited.

(3) If, after 18 months on medical removal because of elevated biological monitoring results, the employee's monitoring results have not declined to a low enough level to permit the employee to be returned to his or her former job status, both of the following provisions shall apply:

(a) An employer shall make available to the employee a medical examination pursuant to these rules in order to obtain a final medical determination as to whether the employee may be returned to his or her former job status or must be permanently removed from excess cadmium exposure.

(b) An employer shall ensure that the final medical determination indicates whether the employee may be returned to his or her former job status and what steps, if any, should be taken to protect the employee's health.

(4) An employer may condition the provision of MRPB upon the employee's participation in medical surveillance provided in accordance with these rules.

R 325.51877. Employee right to second medical opinion; resolution of differing opinions; alternate form of physician determination.

Rule 27. (1) If an employer selects the initial physician to conduct a medical examination or consultation provided to an employee pursuant to these rules, the employee may designate a second physician to do both of the following:

(a) Review any findings, determinations, or recommendations of the initial physician.

(b) Conduct such examinations, consultations, and laboratory tests as the second physician deems necessary to facilitate this review.

(2) An employer shall promptly notify an employee of the right to seek a second medical opinion after each occasion that an initial physician provided by the employer conducts a medical examination or consultation pursuant to these rules. The employer may condition its participation in, and payment for, multiple physician review upon the employee doing both of the following within 15 days after receipt of this notice, or receipt of the initial physician's written opinion, whichever occurs later:

(a) Informing the employer that he or she intends to seek a medical opinion.

(b) Initiating steps to make an appointment with a second physician.

(3) If the findings, determinations, or recommendations of the second physician differ from those of the initial physician, then the employer and the employee shall ensure that efforts are made for the 2 physicians to resolve any disagreement. If the 2 physicians are unable to quickly resolve their disagreement, then the employer and the employee, through their respective physicians, shall designate a third physician to do both of the following:

(a) Review any findings, determinations, or recommendations of the other 2 physicians.

(b) Conduct such examinations, consultations, laboratory tests, and discussions with the other 2 physicians as the third physician deems necessary to resolve the disagreement among them.

(4) An employer shall act consistently with the findings, determinations, and recommendations of the third physician, unless the employer and the employee reach an agreement that is consistent with the recommendations of at least 1 of the other 2 physicians.

(5) An employer and an employee, or designated employee representative, may agree upon the use of any alternate form of physician determination in place of the multiple physician review provided pursuant to the provisions of subrules (1) to (4) of this rule if the alternative is expeditious and at least as protective of the employee.

R 325.51878. Employer provision of medical information to employee.

Rule 28. (1) An employer shall provide a copy of the physician's written medical opinion to the examined employee within 2 weeks after receipt of the opinion.

(2) An employer shall provide the employee with a copy of the employee's biological monitoring results and an explanation sheet explaining the results within 2 weeks after receipt of the results if the employee is employed in general industry or within 5 working days if the employee is employed in the construction industry.

(3) Within 30 days after a request by an employee, an employer shall provide the employee with the information the employer is required to provide to the examining physician pursuant to the provisions of R 325.51874.

R 325.51878a. Hazard communication--general.

Rule 28a. (1) Chemical manufacturers, importers, distributors and employers shall comply with all requirements of the Occupational Health Standard Part 430 "Hazard Communication," as referenced in R 325.51851a, for cadmium.

(2) In classifying the hazards of cadmium at least the following hazards are to be addressed:

(a) Cancer.

(b) Lung effects.

(c) Kidney effects.

(d) Acute toxicity effects.

(3) Employers shall include cadmium in the hazard communication program established to comply with the requirements of the Occupational Health Standard Part 430 "Hazard Communication." Employers shall ensure that each employee has access to labels on containers of cadmium and to safety data sheets, and is trained in accordance with the requirements of R 325.51880 of this rule, and Occupational Health Standard Part 430 "Hazard Communication," as referenced in R 325.51851a.

R 325.51879. Communication of cadmium hazards to employees.

Rule 29 (1) Warning signs shall be provided and displayed in regulated areas. In addition, warning signs shall be posted at all approaches to regulated areas so that an employee may read the signs and take the necessary protective steps before entering the regulated area.

(2) Warning signs required by subrule (1) of this rule, shall bear the following legend:

DANGER CADMIUM MAY CAUSE CANCER CAUSES DAMAGE TO LUNGS AND KIDNEYS WEAR RESPIRATORY PROTECTION IN THIS AREA AUTHORIZED PERSONNEL ONLY

(3) Prior to June 1, 2016, employers may use the following legend in lieu of that specified in subrule (2) of this rule.

DANGER CADMIUM CANCER HAZARD CAN CAUSE LUNG AND KIDNEY DISEASE AUTHORIZED PERSONNEL ONLY RESPIRATORS REQUIRED IN THIS AREA

(4) An employer shall ensure that warning signs that are required by this subrule are illuminated, cleaned, and maintained as necessary so that the legend is readily visible.

(5) An employer shall ensure that all shipping and storage containers that contain cadmium, or cadmium compounds, shall bear appropriate warning labels as specified in R 325.51878a of this rule.

(6) The warning labels for containers of cadmium-contaminated protective clothing, equipment, waste, scrap, or debris shall include at least the following information:

DANGER CONTAINS CADMIUM MAY CAUSE CANCER CAUSES DAMAGE TO LUNGS AND KIDNEYS AVOID CREATING DUST

(7) Prior to June 1, 2015, employers may include the following information on shipping and storage containers containing cadmium, cadmium compounds, or cadmium contaminated clothing, equipment, waste, scrap, or debris in lieu of the labeling requirements specified in R 325.51878a and subrule (2) of this rule:

DANGER CONTAINS CADMIUM CANCER HAZARD AVOID CREATING DUST CAN CAUSE LUNG AND KIDNEY DISEASE

(8) Also, where feasible, installed cadmium products shall have a visible label or other indication that cadmium is present.

R 325.51880. Employee information and training.

Rule 30. (1) An employer shall train each employee who is potentially exposed to cadmium in accordance with the requirements of this rule. The employer shall institute a training program, ensure employee participation in the program, and maintain a record of the contents of the program. Employee training shall be provided before or at the time of initial assignment to a job that involves potential exposure to cadmium and at least annually thereafter.

(2) An employer shall make the training program understandable to the employee and shall ensure that each employee is informed of all of the following:

(a) The health hazards associated with cadmium exposure, with special attention to the type of information provided in appendix A.

(b) The quantity, location, manner of use, release, and storage of cadmium in the workplace and the specific nature of operations that could result in exposure to cadmium, especially exposure above the PEL.

(c) The engineering controls and work practices associated with the employee's job assignment.

(d) The measures employees can take to protect themselves from exposure to cadmium, including modification of smoking and personal hygiene habits, and the specific procedures the employer has implemented to protect employees from exposure to cadmium, such as appropriate work practices, emergency procedures, and the provision of personal protective equipment.

(e) The purpose, proper selection, fitting, proper use, and limitations of respirators and protective clothing.

(f) The purpose and a description of the medical surveillance program required pursuant to the provisions of R 325.51868 to R 325.51878.

(g) The contents of these rules and the appendices to these rules.

(h) The employee's right of access to records as provided by the provisions of Occupational Health Standard Part 470 "Employee Medical Records and Trade Secrets," as referenced in R 325.51851a.

(3) An employer shall make a copy of these rules and the appendices to these rules readily available without cost to all affected employees and shall provide a copy if requested. Also, an employer shall provide to the director, upon request, all materials relating to the employee information and training program.

(4) This subrule applies only to the construction industry. In a multiemployer workplace, an employer who produces, uses, or stores cadmium in a manner that may expose employees of other employers to cadmium shall notify the other employers of the potential hazards in accordance with the provisions of Occupational Health Standard Part 430 "Hazard Communication," for general industry or the construction industry, as referenced in R 325.51851a.

R 325.51881. Recordkeeping.

Rule 31. (1) All of the following provisions pertain to records of exposure monitoring:

(a) An employer shall establish and keep accurate records of all air monitoring for cadmium in the workplace.

(b) Air monitoring records shall include, at a minimum, all of the following information:

(i) The monitoring date, shift, duration, and results in terms of an 8-hour TWA of each sample taken and, if cadmium is not detected, the detection level.

(ii) The name, social security number, and job classification of all employees who are monitored and of all other employees whose exposures the monitoring result is intended to represent, including, if applicable, a description of the justification that monitoring results of 1 employee can represent other employees' exposures.

(iii) A description of the sampling and analytical methods used and evidence of their accuracy.

(iv) The type of respiratory protective device, if any, worn by the monitored employee and by any other employee whose exposure the monitoring result is intended to represent.

(v) A notation of any other conditions that might have affected the monitoring results.

(vi) Any exposure monitoring or objective data that were used and the exposure levels obtained. The provisions of this paragraph apply only to the construction industry.

(c) An employer shall maintain these records for not less than 30 years as set in accordance with the provisions of Occupational Health Standard Part 470 "Employee Medical Records and Trade Secrets," as referenced in R 325.51851a.

(d) This subdivision applies only to the construction industry. An employer shall provide a copy of the results of an employee's air monitoring prescribed in R 325.51854 and R 325.51855 to an industry trade association and to the employee's union, if any. If neither the association nor the union exists, monitoring results shall be furnished to another comparable organization which is competent to maintain such records and which is reasonably accessible to employers and employees in the industry.

(2) This subrule applies to objective data used to exempt an employer from the requirements to perform initial monitoring as provided in R 325.51855(3). For the purposes of these rules, "objective data" means information which demonstrates that a particular product or material that contains cadmium, or a specific process, operation, or activity that involves cadmium, cannot release dust or fumes in concentrations at or above the action level even under the worst-case release conditions. Objective data can be obtained from an industry-wide study or from laboratory product testing results for manufacturers of cadmium containing products or materials. The data the employer uses from an industry-wide survey shall be obtained under workplace conditions closely resembling the processes, types of material, control methods, work practices, and environmental conditions in the employer's current operations. An employer shall establish and maintain a record of the objective data for not less than 30 years.

(3) All of the following provisions pertain to medical surveillance records:

(a) An employer shall establish and maintain an accurate record for each employee covered by the medical surveillance requirements of R 325.51868(1) or (2).

(b) The medical surveillance records shall include, at a minimum, all of the following information about the employee:

(i) Name, social security number, and description of duties.

(ii) A copy of the physician's written opinions and an explanation sheet for biological monitoring results.

(iii) A copy of the medical history, the results of any physical examination, and all test results that are required to be provided by these rules, including biological tests, X rays, pulmonary function tests, and tests that have been obtained to further evaluate any condition that might be related to cadmium exposure.

(iv) The employee's medical symptoms that might be related to exposure to cadmium.

(v) A copy of the information that is provided to the physician as required by the provisions of R 325.51874(1)(b) to (e).

(c) An employer shall ensure that medical records are maintained for the duration of employment plus 30 years as specified by the provisions of Occupational Health Standard Part 470 "Employee Medical Records and Trade Secrets," as referenced in R 325.51851a.

(4) All of the following provisions pertain to the availability and transfer of records.

(a) Except as otherwise provided for in these rules, access to all records that are required to be maintained by this rule shall be in compliance with the provisions of Occupational Health Standard Part 470 "Employee Medical Records and Trade Secrets," as referenced in R 325.51851a.

(b) Within 15 days after a request, an employer shall make an employee's medical records that are required to be kept pursuant to the provisions of subrule (3) of this rule available for examination and copying to the subject employee, to a designated representative, or to anyone who has the specific written consent of the subject employee and, after the employee's death or incapacitation, to the employee's family members.

(c) When an employer ceases to do business and there is no successor employer to receive and retain records for the prescribed period or the employer intends to dispose of any records that are required to be preserved for not less than 30 years, then the employer shall comply with the requirements concerning the transfer of records set forth in Occupational Health Standard Part 470 "Employee Medical Records and Trade Secrets," as referenced in R 325.51851a.

(5) An employer shall ensure that any abnormal condition or disorder that is caused by occupational exposure to cadmium in the workplace is properly recorded in injury and illness records pursuant to the provisions of Administrative Standard Part 11 "Recording and Reporting of Occupational Injuries and Illnesses," as referenced in R 325.51851a.

R 325.51882. Employee observation of monitoring.
Rule 32. An employer shall provide affected employees or their designated representatives an opportunity to observe any monitoring of employee exposure to cadmium. When observation of monitoring requires entry into an area where the use of protective clothing or equipment is required, an employer shall provide the observer with that clothing and equipment and shall ensure that the observer uses the clothing and equipment and complies with all other applicable safety and health procedures.

R 325.51883. Compliance dates.
Rule 33. All of the requirements of these rules that apply to general industry and agricultural operations shall commence on September 16, 1993, except as follows:

(a) Except for small businesses that have 19 or fewer employees, initial monitoring that is required by the provisions of R 325.51855 shall be completed as soon as possible, but not later than 60 days after September 16, 1993. For small businesses, initial monitoring shall be completed as soon as possible, but not later than 120 days after September 16, 1993.

(b) Except for small businesses that have 19 or fewer employees, regulated areas that are required by the provisions of R 325.51857 shall be established as soon as possible after the results of exposure monitoring are known, but not later than 90 days after September 16, 1993. For small businesses, required regulated areas shall be established as soon as possible after the results of exposure monitoring are known, but not later than September 16, 1993.

(c) Except for small businesses that have 19 or fewer employees, respiratory protection that is required by the provisions of R 325.51862 and R 325.51863 shall be provided as soon as possible, but not later than 90 days after September 16, 1993. For small businesses, respiratory protection shall be provided as soon as possible, but not later than 150 days after September 16, 1993.

(d) Written compliance programs that are required by the provisions of R 325.51858(7) shall be completed and available for inspection and copying as soon as possible, but not later than 1 year after September 16, 1993.

(e) The engineering controls that are required by the provisions of R 325.51858(1) to (6) shall be implemented as soon as possible, but not later than 2 years after September 16, 1993. Work practice controls shall be implemented as soon as possible. Work practice controls that are directly related to engineering controls to be implemented in accordance with the compliance plan shall be implemented as soon as possible after the engineering controls are implemented.

(f) Permanent or temporary hand-washing facilities shall be provided as soon as possible, but not later than 60 days after September 16, 1993.

(g) Change rooms, showers, and lunchroom facilities shall be provided as soon as possible, but not later than 1 year after September 16, 1993.

(h) Except for small businesses that have 19 or fewer employees, the employee information and training that is required by the provisions of R 325.51880 shall be provided as soon as possible, but not later than 90 days after September 16, 1993. For small businesses, employee information and training shall be provided as soon as possible, but not later than 180 days after September 16, 1993.

(i) Except for small businesses that have 19 or fewer employees, initial medical examinations that are required by the provisions of R 325.51869 shall be provided as soon as possible, but not later than 90 days after September 16, 1993. For small businesses, initial medical examinations shall be provided as soon as possible, but not later than 180 days after September 16, 1993.

R 325.51884. Competent person for construction.
Rule 34. This rule applies only to construction. The duties of a competent person include all of the following:

(a) Determine before the performance of work whether cadmium is present in the workplace.

(b) Establish regulated areas where necessary and assure that access to and from those areas is limited to authorized employees.

(c) Ensure the adequacy of employee exposure monitoring required by these rules.

(d) Ensure that all employees who are exposed to cadmium levels above the permissible exposure limit wear appropriate personal protective equipment and are trained in the use of appropriate methods of exposure control.

(e) Ensure that proper hygiene facilities are provided and that workers are trained to use those facilities.

(f) Ensure that the engineering controls required by these rules are implemented, maintained in proper operating condition, and functioning properly.

R 325.51885. Rescinded.

R 325.51886. Rescinded.

APPENDIX A
SUBSTANCE SAFETY DATA SHEET - CADMIUM

I. Substance Identification

A. Substance: Cadmium.

B. 8-Hour, Time-weighted-average, Permissible Exposure Limit (TWA PEL):

1. TWA PEL: Five micrograms of cadmium per cubic meter of air 5 ug/m(3), time-weighted average (TWA) for an 8-hour workday.

C. Appearance: Cadmium metal-soft, blue-white, malleable, lustrous metal or grayish-white powder. Some cadmium compounds may also appear as a brown, yellow, or red powdery substance.

II. Health Hazard Data

A. Routes of Exposure.

Cadmium can cause local skin or eye irritation. Cadmium can affect your health if you inhale it or if you swallow it.

B. Effects of Overexposure.

1. Short-term (acute) exposure: Cadmium is much more dangerous by inhalation than by ingestion. High exposures to cadmium that may be immediately dangerous to life or health occur in jobs where workers handle large quantities of cadmium dust or fume; heat cadmium-containing compounds or cadmium-coated surfaces; weld with cadmium solders or cut cadmium-containing materials such as bolts.

2. Severe exposure may occur before symptoms appear. Early symptoms may include mild irritation of the upper respiratory tract, a sensation of constriction of the throat, a metallic taste and/or a cough. A period of 1-10 hours may precede the onset of rapidly progressing shortness of breath, chest pain, and flu-like symptoms with weakness, fever, headache, chills, sweating and muscular pain. Acute pulmonary edema usually develops within 24 hours and reaches a maximum by three days. If death from asphyxia does not occur, symptoms may resolve within a week.

3. Long-term (chronic) exposure. Repeated or long-term exposure to cadmium, even at relatively low concentrations, may result in kidney damage and an increased risk of cancer of the lung and of the prostate.

C. Emergency First Aid Procedures.

1. Eye exposure: Direct contact may cause redness or pain. Wash eyes immediately with large amounts of water, lifting the upper and lower eyelids. Get medical attention immediately.

2. Skin exposure: Direct contact may result in irritation. Remove contaminated clothing and shoes immediately. Wash affected area with soap or mild detergent and large amounts of water. Get medical attention immediately.

3. Ingestion: Ingestion may result in vomiting, abdominal pain, nausea, diarrhea, headache and sore throat. Treatment for symptoms must be administered by medical personnel. Under no circumstances should the employer allow any person whom he retains, employs, supervises or controls to engage in therapeutic chelation. Such treatment is likely to translocate cadmium from pulmonary or other tissue to renal tissue. Get medical attention immediately.

4. Inhalation: If large amounts of cadmium are inhaled, the exposed person must be moved to fresh air at once. If breathing has stopped, perform cardiopulmonary resuscitation. Administer oxygen if available. Keep the affected person warm and at rest. Get medical attention immediately.

5. Rescue: Move the affected person from the hazardous exposure. If the exposed person has been overcome, attempt rescue only after notifying at least one other person of the emergency and putting into effect established emergency procedures. Do not become a casualty yourself. Understand your emergency rescue procedures and know the location of the emergency equipment before the need arises.

III. Employee Information

A. Protective Clothing and Equipment.

1. Respirators: You may be required to wear a respirator for non-routine activities; in emergencies; while your employer is in the process of reducing cadmium exposures through engineering controls; and where engineering controls are not feasible. If respirators are worn in the future, they must have a joint Mine Safety and Health Administration (MSHA) and National Institute for Occupational Safety and Health (NIOSH) label of approval. Cadmium does not have a detectable odor except at levels well above the permissible exposure limits. If you can smell cadmium while wearing a respirator, proceed immediately to fresh air. If you experience difficulty breathing while wearing a respirator, tell your employer.

2. Protective Clothing: You may be required to wear impermeable clothing, gloves, foot gear, a face shield, or other appropriate protective clothing to prevent skin contact with cadmium. Where protective clothing is required, your employer must provide clean garments to you as necessary to assure that the clothing protects you adequately. The employer must replace or repair protective clothing that has become torn or otherwise damaged.

3. Eye Protection: You may be required to wear splash-proof or dust resistant goggles to prevent eye contact with cadmium.

B. Employer Requirements.

1. Medical: If you are exposed to cadmium at or above the action level, your employer is required to provide a medical examination, laboratory tests and a medical history according to the medical surveillance provisions under paragraph (l) of this standard. (See summary chart and tables in this Appendix A.) These tests shall be provided without cost to you. In addition, if you are accidentally exposed to cadmium under conditions known or suspected to constitute toxic exposure to cadmium, your employer is required to make special tests available to you.

2. Access to Records: All medical records are kept strictly confidential. You or your representative are entitled to see the records of measurements of your exposure to cadmium. Your medical examination records can be furnished to your personal physician or designated representative upon request by you to your employer.

3. Observation of Monitoring: Your employer is required to perform measurements that are representative of your exposure to cadmium and you or your designated representative are entitled to observe the monitoring procedure. You are entitled to observe the steps taken in the measurement procedure, and to record the results obtained. When the monitoring procedure is taking place in an area where respirators or personal protective clothing and equipment are required to be worn, you or your representative must also be provided with, and must wear the protective clothing and equipment.

C. Employee Requirements.

You will not be able to smoke, eat, drink, chew gum or tobacco, or apply cosmetics while working with cadmium in regulated areas. You will also not be able to carry or store tobacco products, gum, food, drinks or cosmetics in regulated areas because these products easily become contaminated with cadmium from the workplace and can therefore create another source of unnecessary cadmium exposure.

Some workers will have to change out of work clothes and shower at the end of the day, as part of their workday, in order to wash cadmium from skin and hair. Handwashing and cadmium-free eating facilities shall be provided by the employer and proper hygiene should always be performed before eating. It is also recommended that you do not smoke or use tobacco products, because among other things, they naturally contain cadmium. For further information, read the labeling on such products.

IV. Physician Information

A. Introduction.

The medical surveillance provisions of paragraph (l) generally are aimed at accomplishing three main interrelated purposes: First, identifying employees at higher risk of adverse health effects from excess, chronic exposure to cadmium; second, preventing cadmium-induced disease; and third, detecting and minimizing existing cadmium-induced disease. The core of medical surveillance in this standard is the early and periodic monitoring of the employee's biological indicators of: (a) recent exposure to cadmium; (b) cadmium body burden; and (c) potential and actual kidney damage associated with exposure to cadmium.

The main adverse health effects associated with cadmium overexposure are lung cancer and kidney dysfunction. It is not yet known how to adequately biologically monitor human beings to specifically prevent cadmium-induced lung cancer. By contrast, the kidney can be monitored to provide prevention and early detection of cadmium-induced kidney damage. Since, for non-carcinogenic effects, the kidney is considered the primary target organ of chronic exposure to cadmium, the medical surveillance provisions of this standard effectively focus on cadmium-induced kidney disease. Within that focus, the aim, where possible, is to prevent the onset of such disease and, where necessary, to minimize such disease as may already exist. The by-products of successful prevention of kidney disease are anticipated to be the reduction and prevention of other cadmium-induced diseases.

B. Health Effects.

The major health effects associated with cadmium overexposure are described below.

1. Kidney.

The most prevalent non-malignant disease observed among workers chronically exposed to cadmium is kidney dysfunction. Initially, such dysfunction is manifested as proteinuria. The proteinuria associated with cadmium exposure is most commonly characterized by excretion of low-molecular weight proteins (15,000 to 40,000 MW) accompanied by loss of electrolytes, uric acid, calcium, amino acids, and phosphate. The compounds commonly excreted include: beta-2-microglobulin (B(2)-M), retinol binding protein (RBP), immunoglobulin light chains, and lysozyme. Excretion of low molecular weight proteins are characteristic of damage to the proximal tubules of the kidney (Iwao et al., 1980).

It has also been observed that exposure to cadmium may lead to urinary excretion of high-molecular weight proteins such as albumin, immunoglobulin G, and glycoproteins (Ex. 29). Excretion of high-molecular weight proteins is typically indicative of damage to the glomeruli of the kidney. Bernard et al., (1979) suggest that damage to the glomeruli and damage to the proximal tubules of the kidney may both be linked to cadmium exposure but they may occur independently of each other.

Several studies indicate that the onset of low-molecular weight proteinuria is a sign of irreversible kidney damage (Friberg et al., 1974; Roels et al., 1982; Piscator 1984; Elinder et al., 1985; Smith et al., 1986). Above

specific levels of B(2)-M associated with cadmium exposure it is unlikely that B(2)-M levels return to normal even when cadmium exposure is eliminated by removal of the individual from the cadmium work environment (Friberg, Ex. 29, 1990).

Some studies indicate that such proteinuria may be progressive; levels of B(2)-M observed in the urine increase with time even after cadmium exposure has ceased. See, for example, Elinder et al., 1985. Such observations, however, are not universal, and it has been suggested that studies in which proteinuria has not been observed to progress may not have tracked patients for a sufficiently long time interval (Jarup, Ex. 8-661).

When cadmium exposure continues after the onset of proteinuria, chronic nephrotoxicity may occur (Friberg, Ex. 29). Uremia results from the inability of the glomerulus to adequately filter blood. This leads to severe disturbance of electrolyte concentrations and may lead to various clinical complications including kidney stones (L-140-50).

After prolonged exposure to cadmium, glomerular proteinuria, glucosuria, aminoaciduria, phosphaturia, and hypercalciuria may develop (Exs. 8-86, 4-28, 14-18). Phosphate, calcium, glucose, and amino acids are essential to life, and under normal conditions, their excretion should be regulated by the kidney. Once low molecular weight proteinuria has developed, these elements dissipate from the human body. Loss of glomerular function may also occur, manifested by decreased glomerular filtration rate and increased serum creatinine. Severe cadmium-induced renal damage may eventually develop into chronic renal failure and uremia (Ex. 55).

Studies in which animals are chronically exposed to cadmium confirm the renal effects observed in humans (Friberg et al., 1986). Animal studies also confirm problems with calcium metabolism and related skeletal effects which have been observed among humans exposed to cadmium in addition to the renal effects. Other effects commonly reported in chronic animal studies include anemia, changes in liver morphology, immunosuppression and hypertension. Some of these effects may be associated with co-factors. Hypertension, for example, appears to be associated with diet as well as cadmium exposure. Animals injected with cadmium have also shown testicular necrosis (Ex. 8-86B).

2. Biological Markers

It is universally recognized that the best measures of cadmium exposures and its effects are measurements of cadmium in biological fluids, especially urine and blood. Of the two, CdU is conventionally used to determine body burden of cadmium in workers without kidney disease. CdB is conventionally used to monitor for recent exposure to cadmium. In addition, levels of CdU and CdB historically have been used to predict the percent of the population likely to develop kidney disease (Thun et al., Ex. L-140-50; WHO, Ex. 8-674; ACGIH, Exs. 8-667, 140-50).

The third biological parameter upon which OSHA relies for medical surveillance is Beta-2-microglobulin in urine (B(2)-M), a low molecular weight protein. Excess B(2)-M has been widely accepted by physicians and scientists as a reliable indicator of functional damage to the proximal tubule of the kidney (Exs. 8-447, 144-3-C, 4-47, L-140-45, 19-43-A).

Excess B(2)-M is found when the proximal tubules can no longer reabsorb this protein in a normal manner. This failure of the proximal tubules is an early stage of a kind of kidney disease that commonly occurs among workers with excessive cadmium exposure. Used in conjunction with biological test results indicating abnormal levels of CdU and CdB, the finding of excess B(2)-M can establish for an examining physician that any existing kidney disease is probably cadmium-related (Trs. 6/6/90, pp. 82-86, 122, 134). The upper limits of normal levels for cadmium in urine and cadmium in blood are 3 ug Cd/gram creatinine in urine and 5 ug Cd/liter whole blood, respectively. These levels were derived from broad-based population studies.

Three issues confront the physicians in the use of B(2)-M as a marker of kidney dysfunction and material impairment. First, there are a few other causes of elevated levels of B(2)-M not related to cadmium exposures, some of which may be rather common diseases and some of which are serious diseases (e.g., myeloma or transient flu, Exs. 29 and 8-086). These can be medically evaluated as alternative causes (Friberg, Ex. 29). Also, there are other factors that can cause B(2)-M to degrade so that low levels would result in workers with tubular dysfunction. For example, regarding the degradation of B(2)-M, workers with acidic urine (pH > 6) might have B(2)-M levels that are within the "normal" range when in fact kidney dysfunction has occurred (Ex. L-140-1) and the low molecular weight proteins are degraded in acid urine. Thus, it is very important that the pH of urine be measured, that urine samples be buffered as necessary (See Appendix F.), and that urine samples be handled correctly, i.e., measure the pH of freshly voided urine samples, then if necessary, buffer to pH > 6 (or above for shipping purposes), measure pH again and then, perhaps, freeze the sample for storage and shipping. (See also Appendix F.) Second, there is debate over the pathological significance of proteinuria, however, most world experts believe that B(2)-M levels greater than 300 ug/g Cr are abnormal (Elinder, Ex. 55, Friberg, Ex. 29). Such levels signify kidney dysfunction that constitutes material impairment of health. Finally, detection of B(2)-M at low levels has often been considered difficult, however, many laboratories have the capability of detecting excess B(2)-M using simple kits, such as the Phadebas Delphia test, that are accurate to levels of 100 ug B(2)-M/g Cr U (Ex. L-140-1).

Specific recommendations for ways to measure B(2)-M and proper handling of urine samples to prevent degradation of B(2)-M have been addressed by OSHA in Appendix F, in the section on laboratory standardization.

All biological samples must be analyzed in a laboratory that is proficient in the analysis of that particular analyte, under paragraph (l)(1)(iv). (See Appendix F). Specifically, under paragraph (l)(1)(iv), the employer is to assure that the collecting and handling of biological samples of cadmium in urine (CdU), cadmium in blood (CdB), and beta-2 microglobulin in urine (B(2)-M) taken from employees is collected in a manner that assures reliability. The employer must also assure that analysis of biological samples of cadmium in urine (CdU), cadmium in blood (CdB), and beta-2 microglobulin in urine (B(2)-M) taken from employees is performed in laboratories with demonstrated proficiency for that particular analyte. (See Appendix F.)

3. Lung and Prostrate Cancer

The primary sites for cadmium-associated cancer appear to be the lung and the prostate (L-140-50). Evidence for an association between cancer and cadmium exposure derives from both epidemiological studies and animal experiments. Mortality from prostrate cancer associated with cadmium is slightly elevated in several industrial cohorts, but the number of cases is small and there is not clear dose-response relationship. More substantive evidence exists for lung cancer.

The major epidemiological study of lung cancer was conducted by Thun et al., (Ex. 4-68). Adequate data on cadmium exposures were available to allow evaluation of dose-response relationships between cadmium exposure and lung cancer. A statistically significant excess of lung cancer attributed to cadmium exposure was observed in this study even when confounding variables such as co-exposure to arsenic and smoking habits were taken into consideration (Ex. L-140-50).

The primary evidence for quantifying a link between lung cancer and cadmium exposure from animal studies derives from two rat bioassay studies; one by Takenaka et al., (1983), which is a study of cadmium chloride and a second study by Oldiges and Glaser (1990) of four cadmium compounds.

Based on the above cited studies, the U.S. Environmental Protection Agency (EPA) classified cadmium as "B1", a probable human carcinogen, in 1985 (Ex. 4-4). The International Agency for Research on Cancer (IARC) in 1987 also recommended that cadmium be listed as "2A", a probable human carcinogen (Ex. 4-15). The American Conference of Governmental Industrial Hygienists (ACGIH) has recently recommended that cadmium be labeled as a carcinogen. Since 1984, NIOSH has concluded that cadmium is possibly a human carcinogen and has recommended that exposures be controlled to the lowest level feasible.

4. Non-carcinogenic Effects

Acute pneumonitis occurs 10 to 24 hours after initial acute inhalation of high levels of cadmium fumes with symptoms such as fever and chest pain (Exs. 30, 8-86B). In extreme exposure cases pulmonary edema may develop and cause death several days after exposure. Little actual exposure measurement data is available on the level of airborne cadmium exposure that causes such immediate adverse lung effects, nonetheless, it is reasonable to believe a cadmium concentration of approximately 1 mg/m(3) over an eight hour period is "immediately dangerous" (55 FR 4052, ANSI; Ex. 8-86B).

In addition to acute lung effects and chronic renal effects, long term exposure to cadmium may cause other severe effects on the respiratory system. Reduced pulmonary function and chronic lung disease indicative of emphysema have been observed in workers who have had prolonged exposure to cadmium dust or fumes (Exs. 4-29, 4-22, 4-42, 4-50, 4-63). In a study of workers conducted by Kazantzis et al., a statistically significant excess of worker deaths due to chronic bronchitis was found, which in his opinion was directly related to high cadmium exposures of 1 mg/m(3) or more (Tr. 6/8/90, pp. 156-157).

Cadmium need not be respirable to constitute a hazard. Inspirable cadmium particles that are too large to be respirable but small enough to enter the tracheobronchial region of the lung can lead to bronchoconstriction, chronic pulmonary disease, and cancer of that portion of the lung. All of these diseases have been associated with occupational exposure to cadmium (Ex. 8-86B). Particles that are constrained by their size to the extra-thoracic regions of the respiratory system such as the nose and maxillary sinuses can be swallowed through mucocillary clearance and be absorbed into the body (ACGIH, Ex. 8-692). The impaction of these particles in the upper airways can lead to anosmia, or loss of sense of smell, which is an early indication of overexposure among workers exposed to heavy metals. This condition is commonly reported among cadmium-exposed workers (Ex. 8-86-B).

C. Medical Surveillance

In general, the main provisions of the medical surveillance section of the standard, under paragraphs (l)(1)-(17) of the regulatory text, are as follows:

1. Workers exposed above the action level are covered;
2. Workers with intermittent exposures are not covered;
3. Past workers who are covered receive biological monitoring for at least one year;
4. Initial examinations include a medical questionnaire and biological monitoring of cadmium in blood (CdB), cadmium in urine (CdU), and Beta-2-microglobulin in urine (B(2)-M);
5. Biological monitoring of these three analytes is performed at least annually; full medical examinations are performed biennially;

6. Until five years from the effective date of the standard, medical removal is required when CdU is greater than 15 ug/gram creatinine (g Cr), or CdB is greater than 15 ug/liter whole blood (lwb), or B(2)-M is greater than 1500 ug/g Cr, and CdB is greater than 5 ug/lwb or CdU is greater than 3 ug/g Cr;

7. Beginning five years after the standard is in effect, medical removal triggers will be reduced;

8. Medical removal protection benefits are to be provided for up to 18 months;

9. Limited initial medical examinations are required for respirator usage;

10. Major provisions are fully described under section (l) of the regulatory text; they are outlined here as follows:

A. Eligibility
B. Biological monitoring
C. Actions triggered by levels of CdU, CdB, and B(2)-M (See Summary Charts and Tables in Attachment 1.)
D. Periodic medical surveillance
E. Actions triggered by periodic medical surveillance (See appendix A Summary Chart and Tables in Attachment 1.)
F. Respirator usage
G. Emergency medical examinations
H. Termination examination
I. Information to physician
J. Physician's medical opinion
K. Medical removal protection
L. Medical removal protection benefits
M. Multiple physician review
N. Alternate physician review
O. Information employer gives to employee
P. Recordkeeping
Q. Reporting on OSHA form 200

11. The above mentioned summary of the medical surveillance provisions, the summary chart, and tables for the actions triggered at different levels of CdU, CdB and B(2)-M (in Appendix A Attachment-1) are included only for the purpose of facilitating understanding of the provisions of paragraphs (l)(3) of the final cadmium standard. The summary of the provisions, the summary chart, and the tables do not add to or reduce the requirements in paragraph (l)(3).

D. Recommendations to Physicians

1. It is strongly recommended that patients with tubular proteinuria are counseled on: the hazards of smoking; avoidance of nephrotoxins and certain prescriptions and over-the-counter medications that may exacerbate kidney symptoms; how to control diabetes and/or blood pressure; proper hydration, diet, and exercise (Ex. 19-2). A list of prominent or common nephrotoxins is attached. (See Appendix A Attachment-2.)

2. DO NOT CHELATE; KNOW WHICH DRUGS ARE NEPHROTOXINS OR ARE ASSOCIATED WITH NEPHRITIS.

3. The gravity of cadmium-induced renal damage is compounded by the fact there is no medical treatment to prevent or reduce the accumulation of cadmium in the kidney (Ex. 8-619). Dr. Friberg, a leading world expert on cadmium toxicity, indicated in 1992, that there is no form of chelating agent that could be used without substantial risk. He stated that tubular proteinuria has to be treated in the same way as other kidney disorders (Ex. 29).

4. After the results of a workers' biological monitoring or medical examination are received the employer is required to provide an information sheet to the patient, briefly explaining the significance of the results. (See Attachment 3 of this Appendix A.)

5. For additional information the physician is referred to the following additional resources:

a. The physician can always obtain a copy of the preamble, with its full discussion of the health effects, from OSHA's Computerized Information System (OCIS).

b. The Docket Officer maintains a record of the rulemaking. The Cadmium Docket (H-057A), is located at 200 Constitution Ave. N.W., Room N-2625, Washington, D.C. 20210; telephone: 202-219-7894.

c. The following articles and exhibits in particular from that docket (H-057A):

Exhibit number	Author and paper title

8-447	Lauwerys et. al., Guide for physicians, "Health Maintenance of Workers Exposed to Cadmium," published by the Cadmium Council.
4-67	Takenaka, S., H. Oldiges, H. Konig, D. Hochrainer, G. Oberdorster. "Carcinogenicity of Cadmium Chloride Aerosols in Wistar Rats". JNCI 70:367 373, 1983. (32)
4-68	Thun, M.J., T.M. Schnoor, A.B. Smith, W.E. Halperin, R.A. Lemen. "Mortality Among a Cohort of U.S. Cadmium Production Workers - An Update." JNCI 74(2):325-33, 1985. (8)
4-25	Elinder, C.G., Kjellstrom, T., Hogstedt, C., et al., "Cancer Mortality of Cadmium Workers." Brit. J. Ind. Med. 42:651-655, 1985. (14)
4-26	Ellis, K.J. et al., "Critical Concentrations of Cadmium in Human Renal Cortex: Dose Effect Studies to Cadmium Smelter Workers." J. Toxicol. Environ. Health 7:691-703, 1981. (76)
4-27	Ellis, K.J., S.H. Cohn and T.J. Smith. "Cadmium Inhalation Exposure Estimates: Their Significance with Respect to Kidney and Liver Cadmium Burden." J. Toxicol. Environ. Health 15:173-187, 1985.
4-28	Falck, F.Y., Jr., Fine, L.J., Smith, R.G., McClatchey, K.D., Annesley, T., England, B., and Schork, A.M. "Occupational Cadmium Exposure and Renal Status." Am J.Ind.Med. 4:541, 1983. (64)
8-86A	Friberg, L., C.G. Elinder, et al., "Cadmium and Health a Toxicological and Epidemiological Appraisal Volume I Exposure, Dose, and Metabolism." CRC Press, Inc., Boca Raton, FL, 1986. (Available from the OSHA Technical Data Center)
8-86B	Friberg, L., C.G. Elinder, et al. "Cadmium and Health: A Toxicological and Epidemiological Appraisal Volume II Effects and Response." CRC Press, Inc., Boca Raton, FL, 1986. (Available from the OSHA Technical Data Center)
L-140-45	Elinder, C.G., "Cancer Morality of Cadmium Workers", Brit. J. Ind. Med., 42, 651-655, 1985.
L-140-50	Thun, M., Elinder, C.G., Friberg, L, "Scientific Basis for an Occupational Standard for Cadmium, Am. J. Ind. Med., 20; 629-642, 1991.

V. Information Sheet

The information sheet (Appendix A Attachment-3.) or an equally explanatory one should be provided to you after any biological monitoring results are reviewed by the physician, or where applicable, after any medical examination.

Appendix A
Attachment 1: Appendix A Summary Chart and Tables A and B of Actions Triggered by Biological Monitoring
Appendix A - Summary Chart: Section (1)(3) Medical Surveillance

Categorizing Biological Monitoring Results

(A) Biological monitoring results categories are set forth in Appendix A Table A for the periods ending December 31, 1998 and for the period beginning January 1, 1999.

(B) The results of the biological monitoring for the initial medical exam and the subsequent exams shall determine an employee's biological monitoring result category.

Actions Triggered by Biological Monitoring

(A)(i) The actions triggered by biological monitoring for an employee are set forth in Appendix A Table B.

(ii) The biological monitoring results for each employee under section (1)(3) shall determine the actions required for that employee. That is, for any employee in biological monitoring category C, the employer will perform all of the actions for which there is an X in column C of Appendix A Table B.

(iii) An employee is assigned the alphabetical category ("A" being the lowest) depending upon the test results of the three biological markers.

(iv) An employee is assigned category A if monitoring results for all three biological markers fall at or below the levels indicated in the table listed for category A.

(v) An employee is assigned category B if any monitoring result for any of the three biological markers fall within the range of levels indicated in the table listed for category B, providing no result exceeds the levels listed for category B.

(vi) An employee is assigned category C if any monitoring result for any of the three biological markers are above the levels listed for category C.

(B) The user of Appendix A Tables A and B should know that these tables are provided only to facilitate understanding of the relevant provisions of paragraph (l)(3) of this section. Appendix A Tables A and B are not meant to add to or subtract from the requirements of those provisions.

APPENDIX A - TABLE A
CATEGORIZATION OF BIOLOGICAL MONITORING RESULTS

APPENDIX A - TABLE A
CATEGORIZATION OF BIOLOGICAL MONITORING RESULTS

APPLICABLE THROUGH 1998 ONLY			
BIOLOGICAL MARKER	**MONITORING RESULT CATEGORIE**		
	A	**B**	**C**
Cadmium in urine (CdU) (ug/g creatinine)	< = 3	>3 and < = 15	>15
B(2)-microglobulin (B(2)-M) (ug/g creatinine	< = 300	>300 and < = 1500	>1500(1)
Cadmium in blood (CdB) (ug/liter whole blood)	< = 5	>5 and < = 15	>15
Footnote(1) If an employee's B(2)-M levels are above 1,500 ug/g creatinine, in order for mandatory medical removal to be required (See Appendix A Table B.), either the employee's CdU level must also be >3 ug/g creatinine or CdB level must also be >5 ug/liter whole blood.			
APPLICABLE BEGINNING JANUARY 1, 1999			
BIOLOGICAL MARKER	**MONITORING RESULT CATEGORIE**		
	A	**B**	**C**
Cadmium in urine (CdU) (ug/g creatinine)	< = 3	>3 and < = 7	>7
B(2)-microglobulin (B(2)-M) (ug/g creatinine	< = 300	>300 and < = 750	>750(1)
Cadmium in blood (CdB) (ug/liter whole blood)	< = 5	>5 and < = 10	>10
Footnote(1) If an employee's B(2)-M levels are above 750 ug/g creatinine, in order for mandatory medical removal to be required (See Appendix A Table B.), either the employee's CdU level must also be >3 ug/g creatinine or CdB level must also be >5 ug/liter whole blood.			

APPENDIX A - TABLE B
ACTIONS DETERMINED BY BIOLOGICAL MONITORING

This table presents the actions required based on the monitoring result in Appendix A Table A. Each item is a separate requirement in citing non-compliance. For example, a medical examination within 90 days for an employee in category B is separate from the requirement to administer a periodic medical examination for category B employees on an annual basis

REQUIRED ACTIONS			MONITORING RESULT CATEGORY		
			A(1)	B(1)	C(1)
(1)	**Biological Monitoring:**				
	(a)	Annual	X		
	(b)	Semiannual		X	
	(c)	Quarterly			X
(2)	**Medical Examination:**				
	(a)	Biennial	X		
	(b)	Annual		X	
	(c)	Semiannual			X
	(d)	Within 90 Days		X	X
(3)	**Assess within two weeks**				
	(a)	Excess cadmium exposure		X	X
	(b)	Work practices		X	X
	(c)	Personal hygiene		X	X
	(d)	Respirator usage		X	X
	(e)	Smoking history		X	X
	(f)	Hygiene facilities		X	X
	(g)	Engineering controls		X	X
	(h)	Correct within 30 days		X	X
	(i)	Periodically Assess Exposures			X
(4)	**Discretionary Medical Removal**			X	X
(5)	**Mandatory Medical Removal**				X(2)

Footnote(1) For all employees covered by medical surveillance exclusively because of exposures prior to the effective date of this standard, if they are in Category A, the employer shall follow the requirements of paragraphs (l)(3)(i)(B) and (l)(4)(v)(A). If they are in Category B or C, the employer shall follow the requirements of paragraphs (l)(4)(v)(B)-(C).

Footnote(2) See footnote Appendix A Table A.

APPENDIX A – ATTACHMENT 2
LIST OF MEDICATIONS

A list of the more common medications that a physician, and the employee, may wish to review is likely to include some of the following:	
(1)	anticonvulsants: paramethadione, phenytoin, trimethadone;
(2)	antihypertensive drugs: captopril, methyldopa;
(3)	antimicrobials: aminoglycosides, amphotericin B, cephalosporins, ethambutol;
(4)	antineoplastic agents: cisplatin, methotrexate, mitomycin-C, nitrosoureas, radiation;
(5)	sulfonamide diuretics: acetazolamide, chlorthalidone, furosemide, thiazides;
(6)	halogenated alkanes, hydrocarbons, and solvents that may occur in some settings: carbon tetrachloride, ethylene glycol, toluene; iodinated radiographic contrast media; nonsteroidal anti-inflammatory drugs; and
(7)	other miscellaneous compounds: acetominophen, allopurinol, amphetamines, azathioprine, cimetidine, cyclosporine, lithium, methoxyflurane, methysergide, D-penicillamine, phenacetin, phenendione. A list of drugs associated with acute interstitial nephritis includes:
(1)	antimicrobial drugs: cephalosporins, chloramphenicol, colistin, erythromycin, ethambutol, isoniazid, paraaminosalicylic acid, penicillins, polymyxin B, rifampin, sulfonamides, tetracyclines, and vancomycin;
(2)	other miscellaneous drugs: allopurinol, antipyrene, azathioprine, captopril, cimetidine, clofibrate, methyldopa, phenindione, phenylpropanolamine, phenytoin, probenecid, sulfinpyrazone, sulfonamid diuretics, triamterene; and,
(3)	metals: bismuth, gold.
This list has been derived from commonly available medical textbooks (e.g., Ex. 14-18). The list has been included merely to facilitate the physician's, employer's, and employee's understanding. The list does not represent an official OSHA opinion or policy regarding the use of these medications for particular employees. The use of such medications should be under physician discretion.	

APPENDIX A - ATTACHMENT 3

Biological Monitoring and Medical Examination Results		
Employee:		
Testing Date:		
Cadmium in Urine:		ug/g Cr
Cadmium in Blood:		ug/lwb
Beta-2-microglobulin in Urine:		ug/g Cr
Normal Levels: < = 3 ug/g Cr, < = 5 ug/lwb, < = 300 ug/g Cr		
Physical Examination Results:	N/A	
	Satisfactory	
	Unsatisfactory	(see physician again)
Physician's Review of Pulmonary Function		
Test: N/A	Normal	Abnormal
Next biological monitoring or medical examination scheduled for		

The biological monitoring program has been designed for three main purposes:

(1) to identify employees at risk of adverse health effects from excess, chronic exposure to cadmium;

(2) to prevent cadmium-induced disease(s); and

(3) to detect and minimize existing cadmium-induced disease(s).

The levels of cadmium in the urine and blood provide an estimate of the total amount of cadmium in the body. The amount of a specific protein in the urine (beta-2-microglobulin) indicates changes in kidney function. All three tests must be evaluated together. A single mildly elevated result may not be important if testing at a later time indicates that the results are normal and the workplace has been evaluated to decrease possible sources of cadmium exposure. The levels of cadmium or beta-2-microglobulin may change over a period of days to months and the time needed for those changes to occur is different for each worker.

If the results for biological monitoring are above specific "high levels" [cadmium urine greater than 10 micrograms per gram of creatinine (ug/g Cr), cadmium blood greater than 10 micrograms per liter of whole blood (ug/lwb), or beta-2-microglobulin greater than 1000 micrograms per gram of creatinine (ug/g Cr)], the worker has a much greater chance of developing other kidney diseases.

One way to measure for kidney function is by measuring beta-2-microglobulin in the urine. Beta-2-microglobulin is a protein which is normally found in the blood as it is being filtered in the kidney, and the kidney reabsorbs or returns almost all of the beta-2-microglobulin to the blood. A very small amount (less than 300 ug/g Cr in the urine) of beta-2-microglobulin is not reabsorbed into the blood, but is released in the urine. If cadmium damages the kidney, the amount of beta-2-microglobulin in the urine increases because the kidney cells are unable to reabsorb the beta-2-microglobulin normally. An increase in the amount of beta-2-microglobulin in the urine is a very early sign of kidney dysfunction. A small increase in beta-2-microglobulin in the urine will serve as an early warning sign that the worker may be absorbing cadmium from the air, cigarettes contaminated in the workplace, or eating in areas that are cadmium contaminated.

Even if cadmium causes permanent changes in the kidney's ability to reabsorb beta-2-microglobulin, and the beta-2-microglobulin is above the "high levels", the loss of kidney function may not lead to any serious health problems. Also, renal function naturally declines as people age. The risk for changes in kidney function for workers who have biological monitoring results between the "normal values" and the "high levels" is not well known. Some people are more cadmium-tolerant, while others are more cadmium-susceptible.

For anyone with even a slight increase of beta-2-microglobulin, cadmium in the urine, or cadmium in the blood, it is very important to protect the kidney from further damage. Kidney damage can come from other sources than excess cadmium-exposure so it is also recommended that if a worker's levels are "high" he/she should receive counseling about drinking more water; avoiding cadmium-tainted tobacco and certain medications (nephrotoxins, acetaminophen); controlling diet, vitamin intake, blood pressure and diabetes; etc.

[57 FR 42389, Sept. 14, 1992, as amended at 58 FR 21781, Apr. 23, 1993]

APPENDIX B
SUBSTANCES TECHNICAL GUIDELINES FOR CADMIUM

I. CADMIUM METAL

A. Physical and Chemical Data.			
	1. Substance Identification.		
		Chemical name: Cadmium.	
		Formula: Cd.	
		Molecular Weight: 112.4.	
		Chemical Abstracts Service (CAS) Registry No.: 7740-43-9.	
		Other Identifiers: RETCS EU9800000; EPA D006; DOT 2570 53.	
		Synonyms: Colloidal Cadmium: Kadmium (German): CI77180.	
	2. Physical data.		
		Boiling point: (760 mm Hg): 765 degrees C.	
		Melting point: 321 degrees C.	
		Specific Gravity: (H(2)O=at 20 deg. C): 8.64.	
		Solubility: Insoluble in water; soluble in dilute nitric acid and in sulfuric acid.	
		Appearance: Soft, blue-white, malleable, lustrous metal or grayish-white powder.	
B. Fire, Explosion and Reactivity Data.			
	1. Fire.		
		Fire and Explosion Hazards: The finely divided metal is pyrophoric, that is the dust is a severe fire hazard and moderate explosion hazard when exposed to heat or flame. Burning material reacts violently with extinguishing agents such as water, foam, carbon dioxide, and halons.	
		Flash point: Flammable (dust).	
		Extinguishing media: Dry sand, dry dolomite, dry graphite, or sodium chloride.	
	2. Reactivity.		
		Conditions contributing to instability:	
			Stable when kept in sealed containers under normal temperatures and pressure, but dust may ignite upon contact with air.
			Metal tarnishes in moist air.
		Incompatibilities:	
			Ammonium nitrate, fused: Reacts violently or explosively with cadmium dust below 20 degrees C.
			Hydrozoic acid: Violent explosion occurs after 30 minutes.
			Acids: reacts violently, forms hydrogen gas.
			Oxidizing agents or metals: strong reaction with cadmium dust.
			Nitryl fluoride at slightly elevated temperature: glowing or white incandescence occurs.
			Selenium: reacts exothermically.
			Ammonia: corrosive reaction.
			Sulfur dioxide: corrosive reaction.
			Fire extinguishing agents (water, foam, carbon dioxide, and halons): reacts violently.
			Tellurium: incandescent reaction in hydrogen atmosphere.
			Hazardous decomposition products: The heated metal rapidly forms highly toxic, brownish fumes of oxides of cadmium.
C. Spill, Leak and Disposal Procedures.			
	1. Steps to be taken if the materials is released or spilled risk.		
		Do not touch spilled material.	
		Stop leak if you can do it without risk.	
		Do not get water inside container.	
		For large spills, dike spill for later disposal.	
		Keep unnecessary people away.	
		Isolate hazard area and deny entry.	
		The Superfund Amendments and Reauthorization Act of 1986 Section 304 requires that a release equal to or greater than the reportable quantity for this substance (1 pound) must be immediately reported to the local emergency planning committee, the state emergency response commission, and the National Response Center (800) 424-8802; in Washington, D.C. metropolitan area (202) 426-2675.	

II. CADMIUM OXIDE

A. Physical and Chemical Data		
	1.	Substance identification
		Chemical name: Cadmium Oxide.
		Formula: CdO.
		Molecular Weight: 128.4.
		CAS No.: 1306-19-0.
		Other Identifiers: RTECS EV1929500.
		Synonyms: Kadmu tlenek (Polish).
	2.	Physical data.
		Boiling point (760 mm Hg): 950 degrees C decomposes.
		Melting point: 1500 deg. C.
		Specific Gravity: (H(2)O = 1 at 200 deg. C): 7.0.
		Solubility: Insoluble in water; soluble in acids and alkalines.
		Appearance: Red or brown crystals.
B. Fire, Explosion and Reactivity Data.		
	1.	Fire.
		Fire and Explosion Hazards: Negligible fire hazard when exposed to heat or flame.
		Flash point: Nonflammable.
		Extinguishing media: Dry chemical, carbon dioxide, water spray or foam.
	2.	Reactivity.
		Conditions contributing to instability: Stable under normal temperatures and pressures.
		Incompatibilities: Magnesium may reduce CdO(2) explosively on heating.
		Hazardous decomposition products: Toxic fumes of cadmium.
C. Spill Leak and Disposal Procedures		
	1.	Steps to be taken if the material is released or spilled
		Do not touch spilled material.
		Stop leak if you can do it without risk.
		For small spills, take up with sand or other absorbent material and place into containers for later disposal.
		For small dry spills, use a clean shovel to place material into clean, dry container and then cover.
		Move containers from spill area.
		For larger spills, dike far ahead of spill for later disposal.
		Keep unnecessary people away.
		Isolate hazard area and deny entry.
		The Superfund Amendments and Reauthorization Act of 1986 Section 304 requires that a release equal to or greater than the reportable quantity for this substance (1 pound) must be immediately reported to the local emergency planning committee, the state emergency response commission, and the National Response Center (800) 424-8802; in Washington, D.C. metropolitan area (202) 426-2675.

III. CADMIUM SULFIDE

A. Physical and Chemical Data			
	1.	Substance Identification.	
		Chemical name: Cadmium sulfide.	
		Formula: CdS.	
		Molecular weight: 144.5.	
		CAS No. 1306-23-6.	
		Other Identifiers: RTECS EV3150000.	
		Synonyms:	Aurora yellow;
			Cadmium Golden 366;
			Cadmium Lemon Yellow 527;
			Cadmium Orange;
			Cadmium Primrose 819;
			Cadmium Sulphide;
			Cadmium Yellow;
			Cadmium Yellow 000;
			Cadmium Yellow Conc. Deep;
			Cadmium Yellow Conc. Golden;
			Cadmium Yellow Conc. Lemon;
			Cadmium Yellow Conc. Primrose;
			Cadmium Yellow Oz. Dark;
			Cadmium Yellow Primrose 47-1400;
			Cadmium Yellow 10G Conc.;
			Cadmium Yellow 892;
			Cadmopur Golden Yellow N;
			Cadmopur Yellow: Capsebon;
			C.I. 77199;
			C.I. Pigment Orange 20;
			CI Pigment Yellow 37;
			Ferro Lemon Yellow;
			Ferro Orange Yellow;
			Ferro Yellow;
			Greenockite; NCI-C02711.
	2.	Physical data.	
		Boiling point (760 mm. Hg): sublines in N(2) at 980 deg. C.	
		Melting point: 1750 degrees C (100 atm).	
		Specific Gravity: (H(2)O= 1 at 20 deg. C): 4.82.	
		Solubility: Slightly soluble in water; soluble in acid.	
		Appearance: Light yellow or yellow-orange crystals.	
B. Fire, Explosion and Reactivity Data.			
	1	Fire.	
		Fire and Explosion Hazards: Negligible fire hazard when exposed to heat or flame.	
		Flash point: Nonflammable.	
		Extinguishing media: Dry chemical, carbon dioxide, water spray or foam.	
	2.	Reactivity.	
		Conditions contributing to instability:	
			Generally non-reactive under normal conditions.
			Reacts with acids to form toxic hydrogen sulfide gas.
		Incompatibilities:	
			Reacts vigorously with iodinemonochloride.
		Hazardous decomposition products:	
			Toxic fumes of cadmium and sulfur oxides.

C. Spill Leak and Disposal Procedures.		
	1.	Steps to be taken if the material is released or spilled.
		Do not touch spilled material.
		Stop leak if you can do it without risk.
		For small, dry spills, with a clean shovel place material into clean, dry container and cover.
		Move containers from spill area.
		For larger spills, dike far ahead of spill for later disposal.
		Keep unnecessary people away.
		Isolate hazard and deny entry.

IV. CADMIUM CHLORIDE

A. Physical and Chemical Data.		
	1.	Substance Identification.
		Chemical name: Cadmium chloride.
		Formula: CdC1(2).
		Molecular weight: 183.3.
		CAS No. 10108-64-2.
		Other Identifiers: RTECS EY0175000.
		Synonyms: Caddy; Cadmium dichloride; NA 2570 (DOT); UI-CAD; dichlorocadmium.
	2.	Physical data.
		Boiling point (760 mm Hg): 960 degrees C.
		Melting point: 568 degrees C.
		Specific Gravity: (H(2)O = 1 at 20 deg. C): 4.05.
		Solubility: Soluble in water (140 g/100 cc); soluble in acetone.
		Appearance: small, white crystals.
B. Fire, Explosion and Reactivity Data.		
	1.	Fire.
		Fire and Explosion Hazards:
		Negligible fire and negligible explosion hazard in dust form when exposed to heat or flame.
		Flash point:
		Nonflammable.
		Extinguishing media:
		Dry chemical, carbon dioxide, water spray or foam.
	2.	Reactivity.
		Conditions contributing to instability:
		Generally stable under normal temperatures and pressures.
		Incompatibilities:
		Bromine triflouride rapidly attacks cadmium chloride.
		A mixture of potassium and cadmium chloride may produce a strong explosion on impact.
		Hazardous decomposition products:
		Thermal decomposition may release toxic fumes of hydrogen chloride, chloride, chlorine or oxides of cadmium.
C. Spill Leak and Disposal Procedures.		
	1.	Steps to be taken if the materials is released or spilled.
		Do not touch spilled material.
		Stop leak if you can do it without risk.
		For small, dry spills, with a clean shovel place material into clean, dry container and cover.
		Move containers from spill area.
		For larger spills, dike far ahead of spill for later disposal.
		Keep unnecessary people away. Isolate hazard and deny entry.
		The Superfund Amendments and Reauthorization Act of 1986 Section 304 requires that a release equal to or greater than the reportable quantity for this substance (100 pounds) must be immediately reported to the local emergency planning committee, the state emergency response commission, and the National Response Center (800) 424-8802; in Washington, D.C. Metropolitan area (202) 426-2675.

[57 FR 42389, Sept. 14, 1992]

APPENDIX D
OCCUPATIONAL HEALTH HISTORY INTERVIEW WITH REFERENCE TO CADMIUM EXPOSURE

Directions

(To be read by employee and signed prior to the interview)

Please answer the questions you will be asked as completely and carefully as you can. These questions are asked of everyone who works with cadmium. You will also be asked to give blood and urine samples. The doctor will give your employer a written opinion on whether you are physically capable of working with cadmium. Legally, the doctor cannot share personal information you may tell him/her with your employer. The following information is considered strictly confidential. The results of the tests will go to you, your doctor and your employer. You will also receive an information sheet explaining the results of any biological monitoring or physical examinations performed.

If you are just being hired, the results of this interview and examination will be used to:

(1) Establish your health status and see if working with cadmium might be expected to cause unusual problems,

(2) Determine your health status today and see if there are changes over time,

(3) See if you can wear a respirator safely.

If you are not a new hire: OSHA says that everyone who works with cadmium can have periodic medical examinations performed by a doctor. The reasons for this are:

(a) If there are changes in your health, either because of cadmium or some other reason, to find them early,

(b) to prevent kidney damage.

Please sign below.

I have read these directions and understand them:

_____

Employee signature

_____

Date

Thank you for answering these questions.

(Suggested Format)

Name	
Age	
Social Security #	
Company	
Job	
Type of Preplacement Exam: [ ] Periodic [ ] Termination [ ] Initial [ ] Other	
Blood Pressure	
Pulse Rate	
1.	How long have you worked at the job listed above? [ ] Not yet hired [ ] Number of months [ ] Number of years
2.	JOB DUTIES ETC.

3.	Have you ever been told by a doctor that you had bronchitis? [ ] Yes [ ] No If yes, how long ago? [ ] Number of months [ ] Number of years
4.	Have you ever been told by a doctor that you had emphysema? [ ] Yes [ ] No If yes, how long ago? [ ] Number of years [ ] Number of months
5.	Have you ever been told by a doctor that you had other lung problems? [ ] Yes [ ] No If yes, please describe type of lung problems and when you had these problems.
6.	In the past year, have you had a cough? [ ] Yes [ ] No If yes, did you cough up sputum? [ ] Yes [ ] No If yes, how long did the cough with sputum production last? [ ] Less than 3 months [ ] 3 months or longer If yes, for how many years have you had episodes of cough with sputum production lasting this long? [ ] Less than one [ ] 1 [ ] 2 [ ] Longer than 2
7.	Have you ever smoked cigarettes? [ ] Yes [ ] No
8.	Do you now smoke cigarettes? [ ] Yes [ ] No
9.	If you smoke or have smoked cigarettes, for how many years have you smoked, or did you smoke? [ ] Less than 1 year [ ] Number of years What is or was the greatest number of packs per day that you have smoked? [ ] Number of packs If you quit smoking cigarettes, how many years ago did you quit? [ ] Less than 1 year [ ] Number of years How many packs a day do you now smoke? [ ] Number of packs per day
10.	Have you ever been told by a doctor that you had a kidney or urinary tract disease or disorder? [ ] Yes [ ] No

11.	Have you ever had any of these disorders? Kidney stones [ ] Yes [ ] No Protein in urine [ ] Yes [ ] No Blood in urine [ ] Yes [ ] No Difficulty urinating [ ] Yes [ ] No Other kidney/Urinary disorders [ ] Yes [ ] No Please describe problems, age, treatment, and follow up for any kidney or urinary problems you have had:
12.	Have you ever been told by a doctor or other health care provider who took your blood pressure that your blood pressure was high? [ ] Yes [ ] No
13.	Have you ever been advised to take any blood pressure medication? [ ] Yes [ ] No
14.	Are you presently taking any blood pressure medication? [ ] Yes [ ] No
15.	Are you presently taking any other medication? [ ] Yes [ ] No
16.	Please list any blood pressure or other medications and describe how long you have been taking each one:

Medicine	How Long Taken

17.	Have you ever been told by a doctor that you have diabetes? (sugar in your blood or urine) [ ] Yes [ ] No If yes, do you presently see a doctor about your diabetes? [ ] Yes [ ] No If yes, how do you control your blood sugar? [ ] Diet alone [ ] Diet plus oral medicine [ ] Diet plus insulin (injection)
18.	Have you ever been told by a doctor that you had: Anemia [ ] Yes [ ] No A low blood count? [ ] Yes [ ] No
19.	Do you presently feel that you tire or run out of energy sooner than normal or sooner than other people your age? [ ] Yes [ ] No If yes, for how long have you felt that you tire easily? [ ] Less than 1 year [ ] Number of years
20.	Have you given blood within the last year? [ ] Yes [ ] No If yes, how many times? [ ] Number of times How long ago was the last time you gave blood? [ ] Less than 1 month [ ] Number of months

21.	Within the last year have you had any injuries with heavy bleeding? [ ] Yes [ ] No If yes, how long ago? [ ] Less than 1 month [ ] Number of months Describe:
22.	Have you recently had any surgery? [ ] Yes [ ] No If yes, please describe:
23.	Have you seen any blood lately in your stool or after a bowel movement? [ ] Yes [ ] No
24.	Have you ever had a test for blood in your stool? [ ] Yes [ ] No If yes, did the test show any blood in the stool? [ ] Yes [ ] No What further evaluation and treatment were done?
The following questions pertain to the ability to wear a respirator. Additional information for the physician can be found in The Respiratory Protective Devices Manual.	
25.	Have you ever been told by a doctor that you have asthma? [ ] Yes [ ] No If yes, are you presently taking any medication for asthma? Mark all that apply. [ ] Shots [ ] Pills [ ] Inhaler
26.	Have you ever had a heart attack? [ ] Yes [ ] No If yes, how long ago? [ ] Number of years [ ] Number of months
27.	Have you ever had pains in your chest? [ ] Yes [ ] No If yes, when did it usually happen? [ ] While resting [ ] While working [ ] While exercising [ ] Activity didn't matter
28.	Have you ever had a thyroid problem? [ ] Yes [ ] No

29.	Have you ever had a seizure or fits? [ ] Yes [ ] No
30.	Have you ever had a stroke (cerebrovascular accident)? [ ] Yes [ ] No
31.	Have you ever had a ruptured eardrum or a serious hearing problem? [ ] Yes [ ] No
32.	Do you now have a claustrophobia, meaning fear of crowded or closed in spaces or any psychological problems that would make it hard for you to wear a respirator? [ ] Yes [ ] No
The following questions pertain to reproductive history.	
33.	Have you or your partner had a problem conceiving a child? [ ] Yes [ ] No If yes, specify: [ ] Self [ ] Present mate [ ] Previous mate
34.	Have you or your partner consulted a physician for a fertility or other reproductive problem? [ ] Yes [ ] No If yes, specify who consulted the physician: [ ] Self [ ] Spouse/partner [ ] Self and partner If yes, specify diagnosis made:
35.	Have you or your partner ever conceived a child resulting in a miscarriage, still birth or deformed offspring? [ ] Yes [ ] No If yes, specify: [ ] Miscarriage [ ] Still birth [ ] Deformed offspring If outcome was a deformed offspring, please specify type:
36.	Was this outcome a result of a pregnancy of: [ ] Yours with present partner [ ] Yours with a previous partner
37.	Did the timing of any abnormal pregnancy outcome coincide with present employment? [ ] Yes [ ] No List dates of occurrences:
38.	What is the occupation of your spouse or partner?

For Women Only	
39.	Do you have menstrual periods? [ ] Yes [ ] No Have you had menstrual irregularities? [ ] Yes [ ] No If yes, specify type: If yes, what was the approximated date this problem began? Approximate date problem stopped?
For Men Only	
40.	Have you ever been diagnosed by a physician as having prostate gland problem(s)? [ ] Yes [ ] No If yes, please describe type of problem(s) and what was done to evaluate and treat the problem(s) :

[57 FR 42389, Sept. 14, 1992]

APPENDIX E
CADMIUM IN WORKPLACE ATMOSPHERES

Method Number:	ID-189		
Matrix:	Air		
	OSHA Permissible Exposure Limits:	5 ug/m(3) (TWA), 2.5 ug/m(3) (Action Level TWA)	
	Collection Procedure:	A known volume of air is drawn through a 37-mm diameter filter cassette containing a 0.8-m mixed cellulose ester membrane filter (MCEF).	
	Recommended Air Volume:	960 L	
	Recommended Sampling Rate:	2.0 L/min	
	Analytical Procedure:	Air filter samples are digested with nitric acid.	
After digestion, a small amount of hydrochloric acid is added. The samples are then diluted to volume with deionized water and analyzed by either flame atomic absorption spectroscopy (AAS) or flameless atomic absorption spectroscopy using a heated graphite furnace atomizer (AAS-HGA).			
	Detection Limits:		
	Qualitative:	0.2 ug/m(3) for a 200 L sample by Flame AAS, 0.007 ug/m(3) for a 60 L sample by AAS-HGA	
	Quantitative:	0.70 ug/m(3) for a 200 L sample by Flame AAS, 0.025 ug/m(3) for a 60 L sample by AAS-HGA	
	Precision and Accuracy:	(Flame AAS Analysis and AAS-HGA Analysis):	
		Validation Level:	2.5 to 10 ug/m(3) for a 400 L air vol. 1.25 to 5.0 ug/m(3) for a 60 L air vol.
		CV(1)(pooled):	0.010, 0.043
		Analytical Bias:	+4.0%, -5.8%
		Overall Analytical Error:	+ or - 6.0%, + or - 14.2%
		Method Classification:	Validated
Date: June, 1992			

Inorganic Service Branch II, OSHA Salt Lake Technical Center, Salt Lake City, Utah

Commercial manufacturers and products mentioned in this method are for descriptive use only and do not constitute endorsements by USDOL-OSHA. Similar products from other sources can be substituted.

1. Introduction

1.1. Scope

This method describes the collection of airborne elemental cadmium and cadmium compounds on 0.8-um mixed cellulose ester membrane filters and their subsequent analysis by either flame atomic absorption spectroscopy (AAS) or flameless atomic absorption spectroscopy using a heated graphite furnace atomizer (AAS-HGA). It is applicable for both TWA and Action Level TWA Permissible Exposure Level (PEL) measurements. The two atomic absorption analytical techniques included in the method do not differentiate between cadmium fume and cadmium dust samples. They also do not differentiate between elemental cadmium and its compounds.

1.2. Principle

Airborne elemental cadmium and cadmium compounds are collected on a 0.8-um mixed cellulose ester membrane filter (MCEF). The air filter samples are digested with concentrated nitric acid to destroy the organic matrix and dissolve the cadmium analytes. After digestion, a small amount of concentrated hydrochloric acid is added to help dissolve other metals which may be present.

The samples are diluted to volume with deionized water and then aspirated into the oxidizing air/acetylene flame of an atomic absorption spectrophotometer for analysis of elemental cadmium. If the concentration of cadmium in a sample solution is too low for quantitation by this flame AAS analytical technique, and the sample is to be averaged with other samples for TWA calculations, aliquots of the sample and a matrix modifier are later injected onto a L'vov platform in a pyrolytically-coated graphite tube of a Zeeman atomic absorption spectrophotometer/graphite furnace assembly for analysis of elemental cadmium. The matrix modifier is added to stabilize the cadmium metal and minimize sodium chloride as an interference during the high temperature charring step of the analysis (5.1., 5.2.).

1.3. History

Previously, two OSHA sampling and analytical methods for cadmium were used concurrently (5.3., 5.4.). Both of these methods also required 0.8-um mixed cellulose ester membrane filters for the collection of air samples. These cadmium air filter samples were analyzed by either flame atomic absorption spectroscopy (5.3.) or inductively coupled plasma/atomic emission spectroscopy (ICP-AES) (5.4.). Neither of these two analytical methods have adequate sensitivity for measuring workplace exposure to airborne cadmium at the new lower TWA and Action Level TWA PEL levels when consecutive samples are taken on one employee and the sample results need to be averaged with other samples to determine a single TWA.

The inclusion of two atomic absorption analytical techniques in the new sampling and analysis method for airborne cadmium permits quantitation of sample results over a broad range of exposure levels and sampling periods. The flame AAS analytical technique included in this method is similar to the previous procedure given in the General Metals Method ID-121 (5.3.) with some modifications. The sensitivity of the AAS-HGA analytical technique included in this method is adequate to measure exposure levels at 1/10 the Action Level TWA, or lower, when less than full-shift samples need to be averaged together.

1.4. Properties (5.5.)

Elemental cadmium is a silver-white, blue-tinged, lustrous metal which is easily cut with a knife. It is slowly oxidized by moist air to form cadmium oxide. It is insoluble in water, but reacts readily with dilute nitric acid. Some of the physical properties and other descriptive information of elemental cadmium are given below:

CAS No	7440-43-9
Atomic Number	48
Atomic Symbol	Cd
Atomic Weight	112.41
Melting Point	321 Deg. C
Boiling Point	765 Deg. C
Density	8.65 g/mL (25 Deg. C)

The properties of specific cadmium compounds are described in reference 5.5.

1.5. Method Performance

A synopsis of method performance is presented below. Further information can be found in Section 4.

1.5.1. The qualitative and quantitative detection limits for the flame AAS analytical technique are 0.04 ug (0.004 ug/mL) and 0.14 ug (0.014 ug/mL) cadmium, respectively, for a 10 mL solution volume. These correspond, respectively, to 0.2 ug/m(3) and 0.70 ug/m(3) for a 200 L air volume.

1.5.2. The qualitative and quantitative detection limits for the AAS-HGA analytical technique are 0.44 ng (0.044 ng/mL) and 1.5 ng (0.15 ng/mL) cadmium, respectively, for a 10 mL solution volume. These correspond, respectively, to 0.007 ug/m(3) and 0.025 ug/m(3) for a 60 L air volume.

1.5.3. The average recovery by the flame AAS analytical technique of 17 spiked MCEF samples containing cadmium in the range of 0.5 to 2.0 times the TWA target concentration of 5 ug/m(3) (assuming a 400 L air volume) was 104.0% with a pooled coefficient of variation (CV(1)) of 0.010. The flame analytical technique exhibited a positive bias of +4.0% for the validated concentration range. The overall analytical error (OAE) for the flame AAS analytical technique was + or - 6.0%.

1.5.4. The average recovery by the AAS-HGA analytical technique of 18 spiked MCEF samples containing cadmium in the range of 0.5 to 2.0 times the Action Level TWA target concentration of 2.5 ug/m(3) (assuming a 60 L air volume) was 94.2% with a pooled coefficient of variation (CV(1)) of 0.043. The AAS-HGA analytical technique exhibited a negative bias of -5.8% for the validated concentration range. The overall analytical error (OAE) for the AAS-HGA analytical technique was + or - 14.2%.

1.5.5. Sensitivity in flame atomic absorption is defined as the characteristic concentration of an element required to produce a signal of 1% absorbance (0.0044 absorbance units). Sensitivity values are listed for each element by the atomic absorption spectrophotometer manufacturer and have proved to be a very valuable diagnostic tool to determine if instrumental parameters are optimized and if the instrument is performing up to specification. The sensitivity of the spectrophotometer used in the validation of the flame AAS analytical technique agreed with the manufacturer specifications (5.6.); the 2 ug/mL cadmium standard gave an absorbance reading of 0.350 abs. units.

1.5.6. Sensitivity in graphite furnace atomic absorption is defined in terms of the characteristic mass, the number of picograms required to give an integrated absorbance value of 0.0044 absorbance-second (5.7.). Data suggests that under Stabilized Temperature Platform Furnace (STPF) conditions (see Section 1.6.2.), characteristic mass values are transferable between properly functioning instruments to an accuracy of about 20% (5.2.). The characteristic mass for STPF analysis of cadmium with Zeeman background correction listed by the manufacturer of the instrument used in the validation of the AAS-HGA analytical technique was 0.35 pg. The experimental characteristic mass value observed during the determination of the working range and detection limits of the AAS-HGA analytical technique was 0.41 pg.

1.6. Interferences

1.6.1. High concentrations of silicate interfere in determining cadmium by flame AAS (5.6.). However, silicates are not significantly soluble in the acid matrix used to prepare the samples.

1.6.2. Interferences, such as background absorption, are reduced to a minimum in the AAS-HGA analytical technique by taking full advantage of the Stabilized Temperature Platform Furnace (STPF) concept. STPF includes all of the following parameters (5.2.):

a. Integrated Absorbance,
b. Fast Instrument Electronics and Sampling Frequency,
c. Background Correction,
d. Maximum Power Heating,
e. Atomization off the L'vov platform in a pyrolytically coated graphite tube,
f. Gas Stop during Atomization,
g. Use of Matrix Modifiers.

1.7. Toxicology (5.14.)

Information listed within this section is synopsis of current knowledge of the physiological effects of cadmium and is not intended to be used as the basis for OSHA policy. IARC classifies cadmium and certain of its compounds as Group 2A carcinogens (probably carcinogenic to humans). Cadmium fume is intensely irritating to the respiratory tract. Workplace exposure to cadmium can cause both chronic and acute effects. Acute effects include tracheobronchitis, pneumonitis, and pulmonary edema. Chronic effects include anemia, rhinitis/anosmia, pulmonary emphysema, proteinuria and lung cancer. The primary target organs for chronic disease are the kidneys (non-carcinogenic) and the lungs (carcinogenic).

2. Sampling

2.1. Apparatus

2.1.1. Filter cassette unit for air sampling: A 37-mm diameter mixed cellulose ester membrane filter with a pore size of 0.8-um contained in a 37-mm polystyrene two- or three-piece cassette filter holder (part no. MAWP 037 A0, Millipore Corp., Bedford, MA). The filter is supported with a cellulose backup pad. The cassette is sealed prior to use with a shrinkable gel band.

2.1.2. A calibrated personal sampling pump whose flow is determined to an accuracy of + or - 5% at the recommended flow rate with the filter cassette unit in line.

2.2. Procedure

2.2.1. Attach the prepared cassette to the calibrated sampling pump (the backup pad should face the pump) using flexible tubing. Place the sampling device on the employee such that air is sampled from the breathing zone.

2.2.2. Collect air samples at a flow rate of 2.0 L/min. If the filter does not become overloaded, a full-shift (at least seven hours) sample is strongly recommended for TWA and Action Level TWA measurements with a maximum air volume of 960 L. If overloading occurs, collect consecutive air samples for shorter sampling periods to cover the full workshift.

2.2.3. Replace the end plugs into the filter cassettes immediately after sampling. Record the sampling conditions.

2.2.4. Securely wrap each sample filter cassette end-to-end with an OSHA Form 21 sample seal.

2.2.5. Submit at least one blank sample with each set of air samples. The blank sample should be handled the same as the other samples except that no air is drawn through it.

2.2.6. Ship the samples to the laboratory for analysis as soon as possible in a suitable container designed to prevent damage in transit.

3. Analysis

3.1. Safety Precautions

3.1.1. Wear safety glasses, protective clothing and gloves at all times.

3.1.2. Handle acid solutions with care. Handle all cadmium samples and solutions with extra care (see Sect. 1.7.). Avoid their direct contact with work area surfaces, eyes, skin and clothes. Flush acid solutions which contact the skin or eyes with copious amounts of water.

3.1.3. Perform all acid digestions and acid dilutions in an exhaust hood while wearing a face shield. To avoid exposure to acid vapors, do not remove beakers containing concentrated acid solutions from the exhaust hood until they have returned to room temperature and have been diluted or emptied.

3.1.4. Exercise care when using laboratory glassware. Do not use chipped pipets, volumetric flasks, beakers or any glassware with sharp edges exposed in order to avoid the possibility of cuts or abrasions.

3.1.5. Never pipet by mouth.

3.1.6. Refer to the instrument instruction manuals and SOPs (5.8., 5.9.) for proper and safe operation of the atomic absorption spectrophotometer, graphite furnace atomizer and associated equipment.

3.1.7. Because metallic elements and other toxic substances are vaporized during AAS flame or graphite furnace atomizer operation, it is imperative that an exhaust vent be used. Always ensure that the exhaust system is operating properly during instrument use.

3.2. Apparatus for Sample and Standard Preparation

3.2.1. Hot plate, capable of reaching 150 deg. C, installed in an exhaust hood.

3.2.2. Phillips beakers, 125 mL.

3.2.3. Bottles, narrow-mouth, polyethylene or glass with leakproof caps: used for storage of standards and matrix modifier.

3.2.4. Volumetric flasks, volumetric pipets, beakers and other associated general laboratory glassware.

3.2.5. Forceps and other associated general laboratory equipment.

3.3. Apparatus for Flame AAS Analysis

3.3.1. Atomic absorption spectrophotometer consisting of a(an):
Nebulizer and burner head. Pressure regulating devices capable of maintaining constant oxidant and fuel pressures. Optical system capable of isolating the desired wavelength of radiation (228.8 nm). Adjustable slit. Light measuring and amplifying device. Display, strip chart, or computer interface for indicating the amount of absorbed radiation. Cadmium hollow cathode lamp or electrodeless discharge lamp (EDL) and power supply.

3.3.2. Oxidant: compressed air, filtered to remove water, oil and other foreign substances.

3.3.3. Fuel: standard commercially available tanks of acetylene dissolved in acetone; tanks should be equipped with flash arresters.

CAUTION: Do not use grades of acetylene containing solvents other than acetone because they may damage the PVC tubing used in some instruments.

3.3.4. Pressure-reducing valves: two gauge, two-stage pressure regulators to maintain fuel and oxidant pressures somewhat higher than the controlled operating pressures of the instrument.

3.3.5. Exhaust vent installed directly above the spectrophotometer burner head.

3.4. Apparatus for AAS-HGA Analysis

3.4.1. Atomic absorption spectrophotometer consisting of a(an):

Heated graphite furnace atomizer (HGA) with argon purge system.

Pressure-regulating devices capable of maintaining constant argon purge pressure.

Optical system capable of isolating the desired wavelength of radiation (228.8 nm).

Adjustable slit.

Light measuring and amplifying device.

Display, strip chart, or computer interface for indicating the amount of absorbed radiation (as integrated absorbance, peak area).

Background corrector: Zeeman or deuterium arc. The Zeeman background corrector is recommended.

Cadmium hollow cathode lamp or electrodeless discharge lamp (EDL) and power supply.

Autosampler capable of accurately injecting 5 to 20 uL sample aliquots onto the L'vov Platform in a graphite tube.

3.4.2. Pyrolytically-coated graphite tubes containing solid, pyrolytic L'vov platforms.

3.4.3. Polyethylene sample cups, 2.0 to 2.5 mL, for use with the autosampler.

3.4.4. Inert purge gas for graphite furnace atomizer: compressed gas cylinder of purified argon.

3.4.5. Two gauge, two-stage pressure regulator for the argon gas cylinder.

3.4.6. Cooling water supply for graphite furnace atomizer.

3.4.7. Exhaust vent installed directly above the graphite furnace atomizer.

3.5. Reagents

All reagents should be ACS analytical reagent grade or better.

3.5.1. Deionized water with a specific conductance of less than 10 uS.

3.5.2. Concentrated nitric acid, HNO(3).

3.5.3. Concentrated hydrochloric acid, HCl.

3.5.4. Ammonium phosphate, monobasic, NH(4)H(2)PO(4).

3.5.5. Magnesium nitrate, Mg(NO(3))(2).6H(2)O.

3.5.6. Diluting solution (4% HNO(3), 0.4% HCl): Add 40 mL HNO(3) and 4 mL HCl carefully to approximately 500 mL deionized water and dilute to 1 L with deionized water.

3.5.7. Cadmium standard stock solution, 1,000 ug/mL: Use a commercially available certified 1,000 ug/mL cadmium standard or, alternatively, dissolve 1.0000 g of cadmium metal in a minimum volume of 1:1 HCl and dilute to 1 L with 4% HNO(3). Observe expiration dates of commercial standards. Properly dispose of commercial standards with no expiration dates or prepared standards one year after their receipt or preparation date.

3.5.8. Matrix modifier for AAS-HGA analysis: Dissolve 1.0 g NH(4)H(2)PO(4) and 0.15 g Mg(NO(3))(2).6H(2)O in approximately 200 mL deionized water. Add 1 mL HNO(3) and dilute to 500 mL with deionized water.

3.5.9. Nitric Acid, 1:1 HNO(3)/DI H(2)O mixture: Carefully add a measured volume of concentrated HNO(3) to an equal volume of DI H(2)O.

3.5.10. Nitric acid, 10% v/v: Carefully add 100 mL of concentrated HNO(3) to 500 mL of DI H(2)O and dilute to 1 L.

3.6. Glassware Preparation

3.6.1. Clean Phillips beakers by refluxing with 1:1 nitric acid on a hot plate in a fume hood. Thoroughly rinse with deionized water and invert the beakers to allow them to drain dry.

3.6.2. Rinse volumetric flasks and all other glassware with 10% nitric acid and deionized water prior to use.

3.7. Standard Preparation for Flame AAS Analysis

3.7.1. Dilute stock solutions: Prepare 1, 5, 10 and 100 ug/mL cadmium standard stock solutions by making appropriate serial dilutions of 1,000 ug/mL cadmium standard stock solution with the diluting solution described in Section 3.5.6.

3.7.2. Working standards: Prepare cadmium working standards in the range of 0.02 to 2.0 ug/mL by making appropriate serial dilutions of the dilute stock solutions with the same diluting solution. A suggested method of preparation of the working standards is given below.

Working Standard (ug/mL)	Std Solution (ug/mL)	Aliquot (mL)	Final Vol. (mL)
0.02	1	10	500
0.05	5	5	500
0.1	10	5	500
0.2	10	10	500
0.5	10	25	500
1	100	5	500
2	100	10	500

Store the working standards in 500-mL, narrow-mouth polyethylene or glass bottles with leak proof caps. Prepare every twelve months.

3.8. Standard Preparation for AAS-HGA Analysis

3.8.1. Dilute stock solutions: Prepare 10, 100 and 1,000 ng/mL cadmium standard stock solutions by making appropriate ten-fold serial dilutions of the 1,000 ug/mL cadmium standard stock solution with the diluting solution described in Section 3.5.6.

3.8.2. Working standards: Prepare cadmium working standards in the range of 0.2 to 20 ng/mL by making appropriate serial dilutions of the dilute stock solutions with the same diluting solution. A suggested method of preparation of the working standards is given below.

Working Standard (ug/mL)	Std Solution (ug/mL)	Aliquot (mL)	Final Vol. (mL)
0.02	10	2	100
0.05	10	5	100
1	10	10	100
2	100	2	100
5	100	5	100
10	100	10	100
20	1,000	2	100

Store the working standards in narrow-mouth polyethylene or glass bottles with leakproof caps. Prepare monthly.

3.9. Sample Preparation

3.9.1. Carefully transfer each sample filter with forceps from its filter cassette unit to a clean, separate 125-mL Phillips beaker along with any loose dust found in the cassette. Label each Phillips beaker with the appropriate sample number.

3.9.2. Digest the sample by adding 5 mL of concentrated nitric acid (HNO(3)) to each Phillips beaker containing an air filter sample. Place the Phillips beakers on a hot plate in an exhaust hood and heat the samples until approximately 0.5 mL remains. The sample solution in each Phillips beaker should become clear. If it is not clear, digest the sample with another portion of concentrated nitric acid.

3.9.3. After completing the HNO(3) digestion and cooling the samples, add 40 uL (2 drops) of concentrated HCl to each air sample solution and then swirl the contents. Carefully add about 5 mL of deionized water by pouring it down the inside of each beaker.

3.9.4. Quantitatively transfer each cooled air sample solution from each Phillips beaker to a clean 10-mL volumetric flask. Dilute each flask to volume with deionized water and mix well.

3.10. Flame AAS Analysis

Analyze all of the air samples for their cadmium content by flame atomic absorption spectroscopy (AAS) according to the instructions given below.

3.10.1. Set up the atomic absorption spectrophotometer for the air/acetylene flame analysis of cadmium according to the SOP (5.8.) or the manufacturer's operational instructions. For the source lamp, use the cadmium hollow cathode or electrodeless discharge lamp operated at the manufacturer's recommended rating for continuous operation. Allow the lamp to warm up 10 to 20 min or until the energy output stabilizes. Optimize conditions such as lamp position, burner head alignment, fuel and oxidant flow rates, etc. See the SOP or specific instrument manuals for details. Instrumental parameters for the Perkin-Elmer Model 603 used in the validation of this method are given in Attachment 1.

3.10.2. Aspirate and measure the absorbance of a standard solution of cadmium. The standard concentration should be within the linear range. For the instrumentation used in the validation of this method a 2 ug/mL cadmium standard gives a net absorbance reading of about 0.350 abs. units (see Section 1.5.5.) when the instrument and the source lamp are performing to manufacturer specifications.

3.10.3. To increase instrument response, scale expand the absorbance reading of the aspirated 2 ug/mL working standard approximately four times. Increase the integration time to at least 3 seconds to reduce signal noise.

3.10.4. Autozero the instrument while aspirating a deionized water blank. Monitor the variation in the baseline absorbance reading (baseline noise) for a few minutes to insure that the instrument, source lamp and associated equipment are in good operating condition.

3.10.5. Aspirate the working standards and samples directly into the flame and record their absorbance readings. Aspirate the deionized water blank immediately after every standard or sample to correct for and monitor any baseline drift and noise. Record the baseline absorbance reading of each deionized water blank. Label each standard and sample reading and its accompanying baseline reading.

3.10.6. It is recommended that the entire series of working standards be analyzed at the beginning and end of the analysis of a set of samples to establish a concentration-response curve, ensure that the standard readings agree with each other and are reproducible. Also, analyze a working standard after every five or six samples to monitor the performance of the spectrophotometer. Standard readings should agree within + or - 10 to 15% of the readings obtained at the beginning of the analysis.

3.10.7. Bracket the sample readings with standards during the analysis. If the absorbance reading of a sample is above the absorbance reading of the highest working standard, dilute the sample with diluting solution and reanalyze. Use the appropriate dilution factor in the calculations.

3.10.8. Repeat the analysis of approximately 10% of the samples for a check of precision.

3.10.9. If possible, analyze quality control samples from an independent source as a check on analytical recovery and precision.

3.10.10. Record the final instrument settings at the end of the analysis. Date and label the output.

3.11. AAS-HGA Analysis

Initially analyze all of the air samples for their cadmium content by flame atomic absorption spectroscopy (AAS) according to the instructions given in Section 3.10. If the concentration of cadmium in a sample solution is less than three times the quantitative detection limit [0.04 ug/mL (40 ng/mL) for the instrumentation used in the validation] and the sample results are to be averaged with other samples for TWA calculations, proceed with the AAS-HGA analysis of the sample as described below.

3.11.1. Set up the atomic absorption spectrophotometer and HGA for flameless atomic absorption analysis of cadmium according to the SOP (5.9.) or the manufacturer's operational instructions and allow the instrument to stabilize. The graphite furnace atomizer is equipped with a pyrolytically coated graphite tube containing a pyrolytic platform. For the source lamp, use a cadmium hollow cathode or electrodeless discharge lamp operated at the manufacturer's recommended setting for graphite furnace operation.

The Zeeman background corrector and EDL are recommended for use with the L'vov platform. Instrumental parameters for the Perkin-Elmer Model 5100 spectrophotometer and Zeeman HGA-600 graphite furnace used in the validation of this method are given in Attachment 2.

3.11.2. Optimize the energy reading of the spectrophotometer at 228.8 nm by adjusting the lamp position and the wavelength according to the manufacturer's instructions.

3.11.3. Set up the autosampler to inject a 5-uL aliquot of the working standard, sample or reagent blank solution onto the L'vov platform along with a 10-uL overlay of the matrix modifier.

3.11.4. Analyze the reagent blank (diluting solution, Section 3.5.6.) and then autozero the instrument before starting the analysis of a set of samples. It is recommended that the reagent blank be analyzed several times during the analysis to assure the integrated absorbance (peak area) reading remains at or near zero.

3.11.5. Analyze a working standard approximately midway in the linear portion of the working standard range two or three times to check for reproducibility and sensitivity (see sections 1.5.5. and 1.5.6.) before starting the analysis of samples. Calculate the experimental characteristic mass value from the average integrated absorbance reading and injection volume of the analyzed working standard. Compare this value to the manufacturer's suggested value as a check of proper instrument operation.

3.11.6. Analyze the reagent blank, working standard, and sample solutions. Record and label the peak area (abs-sec) readings and the peak and background peak profiles on the printer/plotter.

3.11.7. It is recommended the entire series of working standards be analyzed at the beginning and end of the analysis of a set of samples. Establish a concentration-response curve and ensure standard readings agree with each other and are reproducible. Also, analyze a working standard after every five or six samples to monitor the performance of the system. Standard readings should agree within + or - 15% of the readings obtained at the beginning of the analysis.

3.11.8. Bracket the sample readings with standards during the analysis. If the peak area reading of a sample is above the peak area reading of the highest working standard, dilute the sample with the diluting solution and reanalyze. Use the appropriate dilution factor in the calculations.

3.11.9. Repeat the analysis of approximately 10% of the samples for a check of precision.

3.11.10. If possible, analyze quality control samples from an independent source as a check of analytical recovery and precision.

3.11.11. Record the final instrument settings at the end of the analysis. Date and label the output.

3.12. Calculations

Note: Standards used for HGA analysis are in ng/mL. Total amounts of cadmium from calculations will be in ng (not ug) unless a prior conversion is made.

3.12.1. Correct for baseline drift and noise in flame AAS analysis by subtracting each baseline absorbance reading from its corresponding working standard or sample absorbance reading to obtain the net absorbance reading for each standard and sample.

3.12.2. Use a least squares regression program to plot a concentration- response curve of net absorbance reading (or peak area for HGA analysis) versus concentration (ug/mL or ng/mL) of cadmium in each working standard.

3.12.3. Determine the concentration (ug/mL or ng/mL) of cadmium in each sample from the resulting concentration-response curve. If the concentration of cadmium in a sample solution is less than three times the quantitative detection limit [0.04 ug/mL (40 ng/mL) for the instrumentation used in the validation of the method] and if consecutive samples were taken on one employee and the sample results are to be averaged with other samples to determine a single TWA, reanalyze the sample by AAS-HGA as described in Section 3.11. and report the AAS-HGA analytical results.

3.12.4. Calculate the total amount (ug or ng) of cadmium in each sample from the sample solution volume (mL):

$$W = (C)(\text{sample vol, mL})(DF)$$

Where:

W = Total cadmium in sample

C = Calculated concentration of cadmium

DF = Dilution Factor (if applicable)

3.12.5. Make a blank correction for each air sample by subtracting the total amount of cadmium in the corresponding blank sample from the total amount of cadmium in the sample.

3.12.6. Calculate the concentration of cadmium in an air sample (mg/m(3) or ug/m(3)) by using one of the following equations:

mg/m(3) = W(bc)/(Air vol sampled, L)

or

ug/m(3) = (W(bc))(1,000 ng/ug)/(Air vol sampled, L)

Where:

W(bc) = blank corrected total ug cadmium in the sample. (1 ug = 1,000 ng)

4. Backup Data

4.1. Introduction

4.1.1. The purpose of this evaluation is to determine the analytical method recovery, working standard range, and qualitative and quantitative detection limits of the two atomic absorption analytical techniques included in this method. The evaluation consisted of the following experiments:

1. An analysis of 24 samples (six samples each at 0.1, 0.5, 1 and 2 times the TWA-PEL) for the analytical method recovery study of the flame AAS analytical technique.
2. An analysis of 18 samples (six samples each at 0.5, 1 and 2 times the Action Level TWA-PEL) for the analytical method recovery study of the AAS-HGA analytical technique.
3. Multiple analyses of the reagent blank and a series of standard solutions to determine the working standard range and the qualitative and quantitative detection limits for both atomic absorption analytical techniques.

4.1.2. The analytical method recovery results at all test levels were calculated from concentration-response curves and statistically examined for outliers at the 99% confidence level. Possible outliers were determined using the Treatment of Outliers test (5.10.). In addition, the sample results of the two analytical techniques, at 0.5, 1.0 and 2.0 times their target concentrations, were tested for homogeneity of variances also at the 99% confidence level. Homogeneity of the coefficients of variation was determined using the Bartlett's test (5.11.). The overall analytical error (OAE) at the 95% confidence level was calculated using the equation (5.12.):

OAE = + or - [|Bias| + (1.96)(CV(1)(pooled))(100%)]

4.1.3. A derivation of the International Union of Pure and Applied Chemistry (IUPAC) detection limit equation (5.13.) was used to determine the qualitative and quantitative detection limits for both atomic absorption analytical techniques:

C(ld) = k(sd)/m (Equation 1)

Where:

C(ld) =	the smallest reliable detectable concentration an analytical instrument can determine at a given confidence level.
k =	3 for the Qualitative Detection Limit at the 99.86% Confidence Level
=	10 for the Quantitative Detection Limit at the 99.99% Confidence Level.
sd =.	standard deviation of the reagent blank (Rbl) readings
m =	analytical sensitivity or slope as calculated by linear regression.

4.1.4. Collection efficiencies of metallic fume and dust atmospheres on 0.8-um mixed cellulose ester membrane filters are well documented and have been shown to be excellent (5.11.). Since elemental cadmium and the cadmium component of cadmium compounds are nonvolatile, stability studies of cadmium spiked MCEF samples were not performed.

4.2. Equipment

4.2.1. A Perkin-Elmer (PE) Model 603 spectrophotometer equipped with a manual gas control system, a stainless steel nebulizer, a burner mixing chamber, a flow spoiler and a 10 cm. (one-slot) burner head was used in the experimental validation of the flame AAS analytical technique. A PE cadmium hollow cathode lamp, operated at the manufacturer's recommended current setting for continuous operation (4 mA), was used as the source lamp. Instrument parameters are listed in Attachment 1.

4.2.2. A PE Model 5100 spectrophotometer, Zeeman HGA-600 graphite furnace atomizer and AS-60 HGA autosampler were used in the experimental validation of the AAS-HGA analytical technique. The spectrophotometer was equipped with a PE Series 7700 professional computer and Model PR-310 printer. A PE System 2 cadmium electrodeless discharge lamp, operated at the manufacturer's recommended current setting for modulated operation (170 mA), was used as the source lamp. Instrument parameters are listed in Attachment 2.

4.3. Reagents

4.3.1 J.T. Baker Chem. Co. (Analyzed grade) concentrated nitric acid, 69.0-71.0%, and concentrated hydrochloric acid, 36.5-38.0%, were used to prepare the samples and standards.

4.3.2. Ammonium phosphate, monobasic, NH(4)H(2)PO(4) and magnesium nitrate, Mg(NO(3))(2).6H(2)O, both manufactured by the Mallinckrodt Chem. Co., were used to prepare the matrix modifier for AAS-HGA analysis.

4.4. Standard Preparation for Flame AAS Analysis

4.4.1. Dilute stock solutions: Prepared 0.01, 0.1, 1, 10 and 100 ug/mL cadmium standard stock solutions by making appropriate serial dilutions of a commercially available 1,000 ug/mL cadmium standard stock solution (RICCA Chemical Co., Lot # A102) with the diluting solution (4% HNO(3), 0.4% HCl).

4.4.2. Analyzed Standards: Prepared cadmium standards in the range of 0.001 to 2.0 ug/mL by pipetting 2 to 10 mL of the appropriate dilute cadmium stock solution into a 100-mL volumetric flask and diluting to volume with the diluting solution. (See Section 3.7.2.)

4.5. Standard Preparation for AAS-HGA Analysis

4.5.1. Dilute stock solutions: Prepared 1, 10, 100 and 1,000 ng/mL cadmium standard stock solutions by making appropriate serial dilutions of a commercially available 1,000 ug/mL cadmium standard stock solution (J.T. Baker Chemical Co., Instra-analyzed, Lot # D22642) with the diluting solution (4% HNO(3), 0.4% HCl).

4.5.2. Analyzed Standards: Prepared cadmium standards in the range of 0.1 to 40 ng/mL by pipetting 2 to 10 mL of the appropriate dilute cadmium stock solution into a 100-mL volumetric flask and diluting to volume with the diluting solution. (See Section 3.8.2.)

4.6. Detection Limits and Standard Working Range for Flame AAS Analysis

4.6.1. Analyzed the reagent blank solution and the entire series of cadmium standards in the range of 0.001 to 2.0 ug/mL three to six times according to the instructions given in Section 3.10. The diluting solution (4% HNO(3), 0.4% HCl) was used as the reagent blank. The integration time on the PE 603 spectrophotometer was set to 3.0 seconds and a four-fold expansion of the absorbance reading of the 2.0 ug/mL cadmium standard was made prior to analysis. The 2.0 ug/mL standard gave a net absorbance reading of 0.350 abs. units prior to expansion in agreement with the manufacturer's specifications (5.6.).

4.6.2. The net absorbance readings of the reagent blank and the low concentration Cd standards from 0.001 to 0.1 ug/mL and the statistical analysis of the results are shown in Table I. The standard deviation, sd, of the six net absorbance readings of the reagent blank is 1.05 abs. units. The slope, m, as calculated by a linear regression plot of the net absorbance readings (shown in Table II) of the 0.02 to 1.0 ug/mL cadmium standards versus their concentration is 772.7 abs. units/(ug/mL).

4.6.3. If these values for sd and the slope, m, are used in Eqn. 1 (Sect. 4.1.3.), the qualitative and quantitative detection limits as determined by the IUPAC Method are:

C(ld)	= (3)(1.05 abs. units)/(772.7 abs. units/(ug/mL))
	= 0.0041 ug/mL for the qualitative detection limit.
C(ld)	= (10)(1.05 abs. units)/(772.7 abs. units/ug/mL))
	= 0.014 ug/mL for the quantitative detection limit.

The qualitative and quantitative detection limits for the flame AAS analytical technique are 0.041 ug and 0.14 ug cadmium, respectively, for a 10 mL solution volume. These correspond, respectively, to 0.2 ug/m(3) and 0.70 ug/m(3) for a 200 L air volume.

4.6.4. The recommended Cd standard working range for flame AAS analysis is 0.02 to 2.0 ug/mL. The net absorbance readings of the reagent blank and the recommended working range standards and the statistical analysis of the results are shown in Table II. The standard of lowest concentration in the working range, 0.02 ug/mL, is slightly greater than the calculated quantitative detection limit, 0.014 ug/mL. The standard of highest concentration in the working range, 2.0 ug/mL, is at the upper end of the linear working range suggested by the manufacturer (5.6.). Although the standard net absorbance readings are not strictly linear at concentrations above 0.5 ug/mL, the deviation from linearity is only about 10% at the upper end of the recommended standard working range. The deviation from linearity is probably caused by the four-fold expansion of the signal suggested in the method. As shown in Table II, the precision of the standard net absorbance readings are excellent throughout the recommended working range; the relative standard deviations of the readings range from 0.009 to 0.064.

4.7. Detection Limits and Standard Working Range for AAS-HGA Analysis

4.7.1. Analyzed the reagent blank solution and the entire series of cadmium standards in the range of 0.1 to 40 ng/mL according to the instructions given in Section 3.11. The diluting solution (4% HNO(3), 0.4% HCl) was used as the reagent blank. A fresh aliquot of the reagent blank and of each standard was used for every analysis. The experimental characteristic mass value was 0.41 pg, calculated from the average peak area (abs-sec) reading of the 5 ng/mL standard which is approximately midway in the linear portion of the working standard range. This agreed within 20% with the characteristic mass value, 0.35 pg, listed by the manufacturer of the instrument (5.2.).

4.7.2. The peak area (abs-sec) readings of the reagent blank and the low concentration Cd standards from 0.1 to 2.0 ng/mL and statistical analysis of the results are shown in Table III. Five of the reagent blank peak area readings were zero and the sixth reading was 1 and was an outlier. The near lack of a blank signal does not satisfy a strict interpretation of the IUPAC method for determining the detection limits. Therefore, the standard deviation of the six peak area readings of the 0.2 ng/mL cadmium standard, 0.75 abs-sec, was used to calculate the detection limits by the IUPAC method. The slope, m, as calculated by a linear regression plot of the peak area (abs-sec) readings (shown in Table IV) of the 0.2 to 10 ng/mL cadmium standards versus their concentration is 51.5 abs-sec/(ng/mL).

4.7.3. If 0.75 abs-sec (sd) and 51.5 abs-sec/(ng/mL) (m) are used in Eqn. 1 (Sect. 4.1.3.), the qualitative and quantitative detection limits as determined by the IUPAC method are:

C(ld)	= (3)(0.75 abs-sec)/(51.5 abs-sec/(ng/mL)) = 0.044 ng/mL for the qualitative detection limit.
C(ld)	= (10)(0.75 abs-sec)/(51.5 abs-sec/(ng/mL)) = 0.15 ng/mL for the quantitative detection limit.

The qualitative and quantitative detection limits for the AAS-HGA analytical technique are 0.44 ng and 1.5 ng cadmium, respectively, for a 10 mL solution volume. These correspond, respectively, to 0.007 ug/m(3) and 0.025 ug/m(3) for a 60 L air volume.

4.7.4. The peak area (abs-sec) readings of the Cd standards from 0.2 to 40 ng/mL and the statistical analysis of the results are given in Table IV. The recommended standard working range for AAS-HGA analysis is 0.2 to 20 ng/mL. The standard of lowest concentration in the recommended working range is slightly greater than the calculated quantitative detection limit, 0.15 ng/mL. The deviation from linearity of the peak area readings of the 20 ng/mL standard, the highest concentration standard in the recommended working range, is approximately 10%. The deviations from linearity of the peak area readings of the 30 and 40 ng/mL standards are significantly greater than 10%. As shown in Table IV, the precision of the peak area readings are satisfactory throughout the recommended working range; the relative standard deviations of the readings range from 0.025 to 0.083.

4.8. Analytical Method Recovery for Flame AAS Analysis

4.8.1. Four sets of spiked MCEF samples were prepared by injecting 20 uL of 10, 50, 100 and 200 ug/mL dilute cadmium stock solutions on 37 mm diameter filters (part no. AAWP 037 00, Millipore Corp., Bedford, MA) with a calibrated micropipet. The dilute stock solutions were prepared by making appropriate serial dilutions of a commercially available 1,000 ug/mL cadmium standard stock solution (RICCA Chemical Co., Lot # A102) with the diluting solution (4% HNO(3), 0.4% HCl). Each set contained six samples and a sample blank. The amount of cadmium in the prepared sets were equivalent to 0.1, 0.5, 1.0 and 2.0 times the TWA PEL target concentration of 5 ug/m(3) for a 400 L air volume.

4.8.2. The air-dried spiked filters were digested and analyzed for their cadmium content by flame atomic absorption spectroscopy (AAS) following the procedure described in Section 3. The 0.02 to 2.0 ug/mL cadmium standards (the suggested working range) were used in the analysis of the spiked filters.

4.8.3. The results of the analysis are given in Table V. One result at 0.5 times the TWA PEL target concentration was an outlier and was excluded from statistical analysis. Experimental justification for rejecting it is that the outlier value was probably due to a spiking error. The coefficients of variation for the three test levels at 0.5 to 2.0 times the TWA PEL target concentration passed the Bartlett's test and were pooled.

4.8.4. The average recovery of the six spiked filter samples at 0.1 times the TWA PEL target concentration was 118.2% with a coefficient of variation (CV(1)) of 0.128. The average recovery of the spiked filter samples in the range of 0.5 to 2.0 times the TWA target concentration was 104.0% with a pooled coefficient of variation (CV(1)) of 0.010. Consequently, the analytical bias found in these spiked sample results over the tested concentration range was + 4.0% and the OAE was + or - 6.0%.

4.9. Analytical Method Recovery for AAS-HGA Analysis

4.9.1. Three sets of spiked MCEF samples were prepared by injecting 15 uL of 5, 10 and 20 ug/mL dilute cadmium stock solutions on 37 mm diameter filters (part no. AAWP 037 00, Millipore Corp., Bedford, MA) with a calibrated micropipet. The dilute stock solutions were prepared by making appropriate serial dilutions of a commercially available certified 1,000 ug/mL cadmium standard stock solution (Fisher Chemical Co., Lot # 913438-24) with the diluting solution (4% HNO(3), 0.4% HCl). Each set contained six samples and a sample blank. The amount of cadmium in the prepared sets were equivalent to 0.5, 1 and 2 times the Action Level TWA target concentration of 2.5 ug/m(3) for a 60 L air volume.

4.9.2. The air-dried spiked filters were digested and analyzed for their cadmium content by flameless atomic absorption spectroscopy using a heated graphite furnace atomizer following the procedure described in Section 3. A five-fold dilution of the spiked filter samples at 2 times the Action Level TWA was made prior to their analysis. The 0.05 to 20 ng/mL cadmium standards were used in the analysis of the spiked filters.

4.9.3. The results of the analysis are given in Table VI. There were no outliers. The coefficients of variation for the three test levels at 0.5 to 2.0 times the Action Level TWA PEL passed the Bartlett's test and were pooled. The average recovery of the spiked filter samples was 94.2% with a pooled coefficient of variation (CV(1)) of 0.043. Consequently, the analytical bias was - 5.8% and the OAE was + or - 14.2%.

4.10. Conclusions

The experiments performed in this evaluation show the two atomic absorption analytical techniques included in this method to be precise and accurate and have sufficient sensitivity to measure airborne cadmium over a broad range of exposure levels and sampling periods.

5. References:

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TABLE I.
CD DETECTION LIMIT STUDY
[Flame AAS Analysis]

STD (ug/mL)	Absorbance reading at 228.8 nm		Statistical analysis
Reagent blank	5	2	n = 6
	4	3	mean = 3.50
	4	3	std dev = 1.05
			CV = 0.30
0.001	6	6	n = 6
	2	4	mean = 5.00
	6	6	std dev = 1.67
			CV = 0.335
0.002	5	7	n = 6
	7	3	mean = 5.50
	7	4	std dev = 1.76
			CV = 0.320
0.005	7	7	n = 6
	8	8	mean = 7.33
	8	6	std dev = 0.817
			CV = 0.111
0.010	10	9	n = 6
	10	13	mean = 10.3
	10	10	std dev = 1.37
			CV = 0.133
0.020	20	23	n = 6
	20	22	mean = 20.8
	20	20	std dev = 1.33
			CV = 0.064
0.050	42	42	n = 6
	42	42	mean = 42.5
	42	45	std dev = 1.22
			CV = 0.029
0.10	-	84	n = 3
	-	80	mean = 82.3
	-	83	std dev = 2.08
			CV = 0.025

TABLE II.
CD STANDARD WORKING RANGE STUDY
[Flame AAS Analysis]

STD (ug/mL)	Absorbance reading at 228.8 nm		Statistical analysis
Reagent blank.	5	2	n = 6
	4	3	mean = 3.50
	4	3	std dev = 1.05
			CV =0.30
0.020	20	23	n = 6
	20	22	mean = 20.8
	20	20	std dev = 1.33
			CV =0.064
0.050	42	42	n = 6
	42	42	mean = 42.5
	42	45	std dev = 1.22
			CV = 0.029
0.10		84	n = 3
		80	mean = 82.3
		83	std dev = 2.08
			CV = 0.025
0.20		161	n = 3
		161	mean = 160.0
		158	std dev = 1.73
			CV =0.011
0.50		391	n = 3
		389	mean = 391.0
		393	std dev = 2.00
			CV = 0.005
1.00		760	n = 3
		748	mean = 753.3
		752	std dev = 6.11
			CV = 0.008
2.00		1416	n = 3
		1426	mean = 1414.3
		1401	std dev = 12.6
			CV = 0.009

Table III.
CD DETECTION LIMIT STUDY
(AAS-HGA Analysis)

STD (ng/mL)	Peak area readings X 10(3) at 228.8 nm		Statistical analysis
Reagent blank	0	0	n = 6
	0	1	mean = 0.167
	0	0	std dev = 0.41
			CV = 2.45
0.1	8	6	n = 6
	5	7	mean = 7.7
	13	7	std dev = 2.8
			CV = 0.366
0.2	11	13	n = 6
	11	12	mean = 11.8
	12	12	std dev = 0.75
			CV = 0.064
0.5	28	33	n = 6
	26	28	mean = 28.8
	28	30	std dev = 2.4
			CV = 0.083
1.0	52	55	n = 6
	56	58	mean = 54.8
	54	54	std dev = 2.0
			CV = 0.037
2.0	101	112	n = 6
	110	110	mean = 108.8
	110	110	std dev = 3.9
			CV = 0.036

Table IV.
CD STANDARD WORKING RANGE STUDY
AAS-HGA Analysis)

STD (ng/mL)	Peak area readings X 10(3) at 228.8 nm		Statistical analysis
0.2	11	13	n = 6
	11	12	mean = 11.8
	12	12	std dev = 0.75
			CV = 0.064
0.5	28	33	n = 6
	26	28	mean = 28.8
	28	30	std dev = 2.4
			CV = 0.083
1.0	52	55	n = 6
	56	58	mean = 54.8
	54	54	std dev = 2.0
			CV = 0.037
2.0	101	112	n = 6
	110	110	mean = 108.8
	110	110	std dev = 3.9
			CV = 0.036
5.0	247	265	n = 6
	268	275	mean = 265.5
	259	279	std dev = 11.5
			CV = 0.044
10.0	495	520	n = 6
	523	513	mean = 516.7
	516	533	std dev = 12.7
			CV = 0.025
20.0	950	953	n = 6
	951	958	mean = 941.8
	949	890	std dev = 25.6
			CV = 0.027
30.0	1269	1291	n = 6
	1303	1307	mean = 1293
	1295	1290	std dev = 13.3
			CV = 0.010
40.0	1505	1567	n = 6
	1535	1567	mean = 1552
	1566	1572	std dev = 26.6
			CV = 0.017

TABLE V.
ANALYTICAL METHOD RECOVERY
(Flame AAS Analysis)

Test Level	0.5X	Percent	ug taken	1.0X	Percent	ug taken	2.0X	Percent
ug taken	ug found	rec.		ug found	rec.		ug found	rec
1.00	1.0715	107.2	2.00	2.0688	103.4	4.00	4.1504	103.8
1.00	1.0842	108.4	2.00	2.0174	100.9	4.00	4.1108	102.8
1.00	1.0842	108.4	2.00	2.0431	102.2	4.00	4.0581	101.5
1.00	(*)1.0081	(*)100.8	2.00	2.0431	102.2	4.00	4.0844	102.1
1.00	1.0715	107.2	2.00	2.0174	100.9	4.00	4.1504	103.8
1.00	1.0842	108.4	2.00	2.0045	100.2	4.00	4.1899	104.7
n =		5			6			9
mean =		107.9			101.6			103.1
std dev =		0.657			1.174			1.199
CV(1) =		0.006			0.011			0.012
CV(1)(pooled) = 0.010								
Footnote(*) Rejected as an outlier - this value did not pass the outlier T-test at the 99% confidence level.								

Test Level	0.1X	Percent Rec.
ug taken	ug found	
0.200	0.2509	125.5
0.200	0.2509	125.5
0.200	0.2761	138.1
0.200	0.2258	112.9
0.200	0.2258	112.9
0.200	0.1881	94.1
n =		6
mean =		118.2
std dev =		15.1
CV(1) =		0.128

TABLE VI.
ANALYTICAL METHOD RECOVERY
(AAS-HGA Analysis)

Test Level	0.5X	Percent	ng taken	1.0X	Percent	ng taken	2.0X	Percent
ng taken	ng found	rec.		ng found	rec.		ng found	rec
75	71.23	95.0	150	138.00	92.0	300	258.43	86.1
75	71.47	95.3	150	138.29	92.2	300	258.46	86.2
75	70.02	93.4	150	136.30	90.9	300	280.55	93.5
75	77.34	103.1	150	146.62	97.7	300	288.34	96.1
75	78.32	104.4	150	145.17	96.8	300	261.74	87.2
75	71.96	95.9	150	144.88	96.6	300	277.22	92.4
n =		6			6			6
mean =		97.9			94.4			90.3
std dev =		4.66			2.98			4.30
CV(1) =		0.048			0.03			0.048
CV(1)(pooled) = 0.043								

Attachment 1

Instrumental Parameters for Flame AAS Analysis	
Atomic Absorption Spectrophotometer (Perkin-Elmer Model 603)	
Flame:	Air/Acetylene -- lean, blue
Oxidant Flow:	55
Fuel Flow:	32
Wavelength:	228.8 nm
Slit:	4 (0.7 nm)
Range:	UV
Signal:	Concentration (4 exp)
Integration Time:	3 sec

Attachment 2

Instrumental Parameters for HGA Analysis	
Atomic Absorption Spectrophotometer (Perkin-Elmer Model 5100)	
Signal Type:	Zeeman AA
Slitwidth:	0.7 nm
Wavelength:	228.8 nm
Measurement:	Peak Area
Integration Time:	6.0 sec
BOC Time:	5 sec
BOC = Background Offset Correction	

ZEEMAN GRAPHITE FURNACE (PERKIN-ELMER MODEL HGA-600)

Step	Ramp time (sec)	Hold time (sec)	Temp. (Deg. C)	Argon flow (mL/min)	Read (sec)
(1) Predry	5	10	90	300	
(2) Dry	30	10	140	300	
(3) Char	10	20	900	300	
(4) Cool Down	1	8	30	300	
(5) Atomize	0	5	1600	0	-1
(6) Burnout	1	8	2500	300	

[57 FR 42389, Sept. 14, 1992, as amended at 58 FR 21782, Apr. 23, 1993]

APPENDIX F
NONMANDATORY PROTOCOL FOR BIOLOGICAL MONITORING

1.0 Introduction

Under the final OSHA cadmium rule (29 CFR 1910), monitoring of biological specimens and several periodic medical examinations are required for eligible employees. These medical examinations are to be conducted regularly, and medical monitoring is to include the periodic analysis of cadmium in blood (CDB), cadmium in urine (CDU) and beta-2-microglobulin in urine (B(2)MU). As CDU and B(2)MU are to be normalized to the concentration of creatinine in urine (CRTU), then CRTU must be analyzed in conjunction with CDU and B(2)MU analyses.

The purpose of this protocol is to provide procedures for establishing and maintaining the quality of the results obtained from the analyses of CDB, CDU and B(2)MU by commercial laboratories. Laboratories conforming to the provisions of this nonmandatory protocol shall be known as "participating laboratories." The biological monitoring data from these laboratories will be evaluated by physicians responsible for biological monitoring to determine the conditions under which employees may continue to work in locations exhibiting airborne-cadmium concentrations at or above defined actions levels (see paragraphs (l)(3) and (l)(4) of the final rule). These results also may be used to support a decision to remove workers from such locations.

Under the medical monitoring program for cadmium, blood and urine samples must be collected at defined intervals from workers by physicians responsible for medical monitoring; these samples are sent to commercial laboratories that perform the required analyses and report results of these analyses to the responsible physicians. To ensure the accuracy and reliability of these laboratory analyses, the laboratories to which samples are submitted should participate in an ongoing and efficacious proficiency testing program. Availability of proficiency testing programs may vary with the analyses performed.

To test proficiency in the analysis of CDB, CDU and B(2)MU, a laboratory should participate either in the interlaboratory comparison program operated by the Centre de Toxicologie du Quebec (CTQ) or an equivalent program. (Currently, no laboratory in the U.S. performs proficiency testing on CDB, CDU or B(2)MU.) Under this program, CTQ sends participating laboratories 18 samples of each analyte (CDB, CDU and/or B(2)MU) annually for analysis. Participating laboratories must return the results of these analyses to CTQ within four to five weeks after receiving the samples.

The CTQ program pools analytical results from many participating laboratories to derive consensus mean values for each of the samples distributed. Results reported by each laboratory then are compared against these consensus means for the analyzed samples to determine the relative performance of each laboratory. The proficiency of a participating laboratory is a function of the extent of agreement between results submitted by the participating laboratory and the consensus values for the set of samples analyzed.

Proficiency testing for CRTU analysis (which should be performed with CDU and B(2)MU analyses to evaluate the results properly) also is recommended. In the U.S., only the College of American Pathologists (CAP) currently conducts CRTU proficiency testing; participating laboratories should be accredited for CRTU analysis by the CAP.

Results of the proficiency evaluations will be forwarded to the participating laboratory by the proficiency-testing laboratory, as well as to physicians designated by the participating laboratory to receive this information. In addition, the participating laboratory should, on request, submit the results of their internal Quality Assurance/Quality Control (QA/QC) program for each analytic procedure (i.e., CDB, CDU and/or B(2)MU) to physicians designated to receive the proficiency results. For participating laboratories offering CDU and/or B(2)MU analyses, QA/QC documentation also should be provided for CRTU analysis. (Laboratories should provide QA/QC information regarding CRTU analysis directly to the requesting physician if they perform the analysis in-house; if CRTU analysis is performed by another laboratory under contract, this information should be provided to the physician by the contract laboratory.)

QA/QC information, along with the actual biological specimen measurements, should be provided to the responsible physician using standard formats. These physicians then may collate the QA/QC information with proficiency test results to compare the relative performance of laboratories, as well as to facilitate evaluation of the worker monitoring data. This information supports decisions made by the physician with regard to the biological monitoring program, and for mandating medical removal.

This protocol describes procedures that may be used by the responsible physicians to identify laboratories most likely to be proficient in the analysis of samples used in the biological monitoring of cadmium; also provided are procedures for record keeping and reporting by laboratories participating in proficiency testing programs, and recommendations to assist these physicians in interpreting analytical results determined by participating laboratories. As the collection and handling of samples affects the quality of the data, recommendations are made for these tasks. Specifications for analytical methods to be used in the medical monitoring program are included in this protocol as well.

In conclusion, this document is intended as a supplement to characterize and maintain the quality of medical monitoring data collected under the final cadmium rule promulgated by OSHA (29 CFR 1910). OSHA has been

granted authority under the Occupational Safety and Health Act of 1970 to protect workers from the effects of exposure to hazardous substances in the work place and to mandate adequate monitoring of workers to determine when adverse health effects may be occurring. This nonmandatory protocol is intended to provide guidelines and recommendations to improve the accuracy and reliability of the procedures used to analyze the biological samples collected as part of the medical monitoring program for cadmium.

2.0 Definitions

When the terms below appear in this protocol, use the following definitions.

Accuracy: A measure of the bias of a data set. Bias is a systematic error that is either inherent in a method or caused by some artifact or idiosyncracy of the measurement system. Bias is characterized by a consistent deviation (positive or negative) in the results from an accepted reference value.

Arithmetic Mean: The sum of measurements in a set divided by the number of measurements in a set.

Blind Samples: A quality control procedure in which the concentration of analyte in the samples should be unknown to the analyst at the time that the analysis is performed.

Coefficient of Variation: The ratio of the standard deviation of a set of measurements to the mean (arithmetic or geometric) of the measurements.

Compliance Samples: Samples from exposed workers sent to a participating laboratory for analysis.

Control Charts: Graphic representations of the results for quality control samples being analyzed by a participating laboratory.

Control Limits: Statistical limits which define when an analytic procedure exceeds acceptable parameters; control limits provide a method of assessing the accuracy of analysts, laboratories, and discrete analytic runs.

Control Samples: Quality control samples.

F/T: The measured amount of an analyte divided by the theoretical value (defined below) for that analyte in the sample analyzed; this ratio is a measure of the recovery for a quality control sample.

Geometric Mean: The natural antilog of the mean of a set of natural log-transformed data.

Geometric Standard Deviation: The antilog of the standard deviation of a set of natural log-transformed data.

Limit of Detection: Using a predefined level of confidence, this is the lowest measured value at which some of the measured material is likely to have come from the sample.

Mean: A central tendency of a set of data; in this protocol, this mean is defined as the arithmetic mean (see definition of arithmetic mean above) unless stated otherwise.

Performance: A measure of the overall quality of data reported by a laboratory.

Pools: Groups of quality-control samples to be established for each target value (defined below) of an analyte. For the protocol provided in attachment 3, for example, the theoretical value of the quality control samples of the pool must be within a range defined as plus or minus (+ or -) 50% of the target value. Within each analyte pool, there must be quality control samples of at least 4 theoretical values.

Precision: The extent of agreement between repeated, independent measurements of the same quantity of an analyte.

Proficiency: The ability to satisfy a specified level of analyte performance.

Proficiency Samples: Specimens, the values of which are unknown to anyone at a participating laboratory, and which are submitted by a participating laboratory for proficiency testing.

Quality or Data Quality: A measure of the confidence in the measurement value.

Quality Control (QC) Samples: Specimens, the value of which is unknown to the analyst, but is known to the appropriate QA/QC personnel of a participating laboratory; when used as part of a laboratory QA/QC program, the theoretical values of these samples should not be known to the analyst until the analyses are complete. QC samples are to be run in sets consisting of one QC sample from each pool (see definition of "pools" above).

Sensitivity: For the purposes of this protocol, the limit of detection.

Standard Deviation: A measure of the distribution or spread of a data set about the mean; the standard deviation is equal to the positive square root of the variance, and is expressed in the same units as the original measurements in the data set.

Standards: Samples with values known by the analyst and used to calibrate equipment and to check calibration throughout an analytic run. In a laboratory QA/QC program, the values of the standards must exceed the values obtained for compliance samples such that the lowest standard value is near the limit of detection and the highest standard is higher than the highest compliance sample or QC sample. Standards of at least three different values are to be used for calibration, and should be constructed from at least 2 different sources.

Target Value: Those values of CDB, CDU or B(2)MU which trigger some action as prescribed in the medical surveillance section of the regulatory text of the final cadmium rule. For CDB, the target values are 5, 10, and 15 ug/l. For CDU, the target values are 3, 7, and 15 ug/g CRTU. For B(2)MU, the target values are 300, 750, and 1500 ug/g CRTU. (Note that target values may vary as a function of time.)

Theoretical Value (or Theoretical Amount): The reported concentration of a quality-control sample (or calibration standard) derived from prior characterizations of the sample.

Value or Measurement Value: The numerical result of a measurement.

Variance: A measure of the distribution or spread of a data set about the mean; the variance is the sum of the squares of the differences between the mean and each discrete measurement divided by one less than the number of measurements in the data set.

3.0 Protocol

This protocol provides procedures for characterizing and maintaining the quality of analytic results derived for the medical monitoring program mandated for workers under the final cadmium rule.

3.1 Overview

The goal of this protocol is to assure that medical monitoring data are of sufficient quality to facilitate proper interpretation. The data quality objectives (DQOs) defined for the medical monitoring program are summarized in Table 1. Based on available information, the DQOs presented in Table 1 should be achievable by the majority of laboratories offering the required analyses commercially; OSHA recommends that only laboratories meeting these DQOs be used for the analysis of biological samples collected for monitoring cadmium exposure.

TABLE 1
RECOMMENDED DATA QUALITY OBJECTIVES (DQOs) FOR THE CADMIUM MEDICAL MONITORING PROGRAM

Analyte/Concentration Pool		Limit of Detection	Precision (CV)	Accuracy
Cadmium in Blood		0.5 ug/l	-	+ or - 1 ug/l or 15% of the mean
	Less than or = to 2 ug/l	-	40%	
	Greater than 2 ug/l	-	20%	
Cadmium in Urine		0.5 ug/g creatinine	-	+ or - 1 ug/l or 15% of the mean
	Less than or = to 2 ug/l creatinine	-	40% |	
	Greater than 2 ug/l creatinine	-	20%	
B-2-Microglobulin in Urine		100 ug/g creatinine	-	+ or - 15% of the mean
100 ug/g creatinine		-	5%	

To satisfy the DQOs presented in Table 1, OSHA provides the following guidelines:

1. Procedures for the collection and handling of blood and urine are specified (Section 3.4.1 of this protocol);
2. Preferred analytic methods for the analysis of CDB, CDU and B(2)MU are defined (and a method for the determination of CRTU also is specified since CDU and B(2)MU results are to be normalized to the level of CRTU).
3. Procedures are described for identifying laboratories likely to provide the required analyses in an accurate and reliable manner;
4. These guidelines (Sections 3.2.1 to 3.2.3, and Section 3.3) include recommendations regarding internal QA/QC programs for participating laboratories, as well as levels of proficiency through participation in an interlaboratory proficiency program;
5. Procedures for QA/QC record keeping (Section 3.3.2), and for reporting QC/QA results are described (Section 3.3.3); and,
6. Procedures for interpreting medical monitoring results are specified (Section 3.4.3).

Methods recommended for the biological monitoring of eligible workers are:

1. The method of Stoeppler and Brandt (1980) for CDB determinations (limit of detection: 0.5 ug/l);
2. The method of Pruszkowska et al. (1983) for CDU determinations (limit of detection: 0.5 ug/l of urine); and,
3. The Pharmacia Delphia test kit (Pharmacia 1990) for the determination of B(2)MU (limit of detection: 100 ug/l urine).

Because both CDU and B(2)MU should be reported in ug/g CRTU, an independent determination of CRTU is recommended. Thus, both the OSHA Salt Lake City Technical Center (OSLTC) method (OSHA, no date) and the

Jaffe method (Du Pont, no date) for the determination of CRTU are specified under this protocol (i.e., either of these 2 methods may be used). Note that although detection limits are not reported for either of these CRTU methods, the range of measurements expected for CRTU (0.9-1.7 ug/l) are well above the likely limit of detection for either of these methods (Harrison, 1987).

Laboratories using alternate methods should submit sufficient data to the responsible physicians demonstrating that the alternate method is capable of satisfying the defined data quality objectives of the program. Such laboratories also should submit a QA/QC plan that documents the performance of the alternate method in a manner entirely equivalent to the QA/QC plans proposed in Section 3.3.1.

3.2 Duties of the Responsible Physician

The responsible physician will evaluate biological monitoring results provided by participating laboratories to determine whether such laboratories are proficient and have satisfied the QA/QC recommendations. In determining which laboratories to employ for this purpose, these physicians should review proficiency and QA/QC data submitted to them by the participating laboratories.

Participating laboratories should demonstrate proficiency for each analyte (CDU, CDB and B(2)MU) sampled under the biological monitoring program. Participating laboratories involved in analyzing CDU and B(2)MU also should demonstrate proficiency for CRTU analysis, or provide evidence of a contract with a laboratory proficient in CRTU analysis.

3.2.1 Recommendations for Selecting Among Existing Laboratories

OSHA recommends that existing laboratories providing commercial analyses for CDB, CDU and/or B(2)MU for the medical monitoring program satisfy the following criteria:

1. Should have performed commercial analyses for the appropriate analyte (CDB, CDU and/or B(2)MU) on a regular basis over the last 2 years;
2. Should provide the responsible physician with an internal QA/QC plan;
3. If performing CDU or B(2)MU analyses, the participating laboratory should be accredited by the CAP for CRTU analysis, and should be enrolled in the corresponding CAP survey (note that alternate credentials may be acceptable, but acceptability is to be determined by the responsible physician); and,
4. Should have enrolled in the CTQ interlaboratory comparison program for the appropriate analyte (CDB, CDU and/or B(2)MU).

Participating laboratories should submit appropriate documentation demonstrating compliance with the above criteria to the responsible physician. To demonstrate compliance with the first of the above criteria, participating laboratories should submit the following documentation for each analyte they plan to analyze (note that each document should cover a period of at least 8 consecutive quarters, and that the period designated by the term "regular analyses" is at least once a quarter):

1. Copies of laboratory reports providing results from regular analyses of the appropriate analyte (CDB, CDU and/or B(2)MU);
2. Copies of 1 or more signed and executed contracts for the provision of regular analyses of the appropriate analyte (CDB, CDU and/or B(2)MU); or,
3. Copies of invoices sent to 1 or more clients requesting payment for the provision of regular analyses of the appropriate analyte (CDB, CDU and/or B(2)MU). Whatever the form of documentation submitted, the specific analytic procedures conducted should be identified directly. The forms that are copied for submission to the responsible physician also should identify the laboratory which provided these analyses.

To demonstrate compliance with the second of the above criteria, a laboratory should submit to the responsible physician an internal QA/QC plan detailing the standard operating procedures to be adopted for satisfying the recommended QA/QC procedures for the analysis of each specific analyte (CDB, CDU and/or B(2)MU). Procedures for internal QA/QC programs are detailed in Section 3.3.1 below.

To satisfy the third of the above criteria, laboratories analyzing for CDU or B(2)MU also should submit a QA/QC plan for creatinine analysis (CRTU); the QA/QC plan and characterization analyses for CRTU must come from the laboratory performing the CRTU analysis, even if the CRTU analysis is being performed by a contract laboratory.

Laboratories enrolling in the CTQ program (to satisfy the last of the above criteria) must remit, with the enrollment application, an initial fee of approximately $100 per analyte. (Note that this fee is only an estimate, and is subject to revision without notice.) Laboratories should indicate on the application that they agree to have proficiency test results sent by the CTQ directly to the physicians designated by participating laboratories.

Once a laboratory's application is processed by the CTQ, the laboratory will be assigned a code number which will be provided to the laboratory on the initial confirmation form, along with identification of the specific analytes for which the laboratory is participating. Confirmation of participation will be sent by the CTQ to physicians designated by the applicant laboratory.

3.2.2 Recommended Review of Laboratories Selected to Perform Analyses

Six months after being selected initially to perform analyte determinations, the status of participating laboratories should be reviewed by the responsible physicians. Such reviews should then be repeated every 6 months or whenever additional proficiency or QA/QC documentation is received (whichever occurs first).

As soon as the responsible physician has received the CTQ results from the first 3 rounds of proficiency testing (i.e., 3 sets of 3 samples each for CDB, CDU and/or B(2)MU) for a participating laboratory, the status of the laboratory's continued participation should be reviewed.

Over the same initial 6-month period, participating laboratories also should provide responsible physicians the results of their internal QA/QC monitoring program used to assess performance for each analyte (CDB, CDU and/or B(2)MU) for which the laboratory performs determinations. This information should be submitted using appropriate forms and documentation.

The status of each participating laboratory should be determined for each analyte (i.e., whether the laboratory satisfies minimum proficiency guidelines based on the proficiency samples sent by the CTQ and the results of the laboratory's internal QA/QC program). To maintain competency for analysis of CDB, CDU and/or B(2)MU during the first review, the laboratory should satisfy performance requirements for at least 2 of the 3 proficiency samples provided in each of the 3 rounds completed over the 6-month period. Proficiency should be maintained for the analyte(s) for which the laboratory conducts determinations.

To continue participation for CDU and/or B(2)MU analyses, laboratories also should either maintain accreditation for CRTU analysis in the CAP program and participate in the CAP surveys, or they should contract the CDU and B(2)MU analyses to a laboratory which satisfies these requirements (or which can provide documentation of accreditation/participation in an equivalent program).

The performance requirement for CDB analysis is defined as an analytical result within + or - 1 ug/l blood or 15% of the consensus mean (whichever is greater). For samples exhibiting a consensus mean less than 1 ug/l, the performance requirement is defined as a concentration between the detection limit of the analysis and a maximum of 2 ug/l. The purpose for redefining the acceptable interval for low CDB values is to encourage proper reporting of the actual values obtained during measurement; laboratories, therefore, will not be penalized (in terms of a narrow range of acceptability) for reporting measured concentrations smaller than 1 ug/l.

The performance requirement for CDU analysis is defined as an analytical result within + or - 1 ug/l urine or 15% of the consensus mean (whichever is greater). For samples exhibiting a consensus mean less than 1 ug/l urine, the performance requirement is defined as a concentration between the detection limit of the analysis and a maximum of 2 ug/l urine. Laboratories also should demonstrate proficiency in creatinine analysis as defined by the CAP. Note that reporting CDU results, other than for the CTQ proficiency samples (i.e., compliance samples), should be accompanied with results of analyses for CRTU, and these 2 sets of results should be combined to provide a measure of CDU in units of ug/g CRTU.

The performance requirement for B(2)MU is defined as analytical results within + or - 15% of the consensus mean. Note that reporting B(2)MU results, other than for CTQ proficiency samples (i.e., compliance samples), should be accompanied with results of analyses for CRTU, and these 2 sets of results should be combined to provide a measure of B(2)MU in units of ug/g CRTU.

There are no recommended performance checks for CRTU analyses. As stated previously, laboratories performing CRTU analysis in support of CDU or B(2)MU analyses should be accredited by the CAP, and participating in the CAP's survey for CRTU.

Following the first review, the status of each participating laboratory should be reevaluated at regular intervals (i.e., corresponding to receipt of results from each succeeding round of proficiency testing and submission of reports from a participating laboratory's internal QA/QC program).

After a year of collecting proficiency test results, the following proficiency criterion should be added to the set of criteria used to determine the participating laboratory's status (for analyzing CDB, CDU and/or B(2)MU): A participating laboratory should not fail performance requirements for more than 4 samples from the 6 most recent consecutive rounds used to assess proficiency for CDB, CDU and/or B(2)MU separately (i.e., a total of 18 discrete proficiency samples for each analyte). Note that this requirement does not replace, but supplements, the recommendation that a laboratory should satisfy the performance criteria for at least 2 of the 3 samples tested for each round of the program.

3.2.3 Recommendations for Selecting Among Newly-Formed Laboratories (or Laboratories that Previously Failed to Meet the Protocol Guidelines)

OSHA recommends that laboratories that have not previously provided commercial analyses of CDB, CDU and/or B(2)MU (or have done so for a period less than 2 years), or which have provided these analyses for 2 or more years but have not conformed previously with these protocol guidelines, should satisfy the following provisions for each analyte for which determinations are to be made prior to being selected to analyze biological samples under the medical monitoring program:

1. Submit to the responsible physician an internal QA/QC plan detailing the standard operating procedures to be adopted for satisfying the QA/QC guidelines (guidelines for internal QA/QC programs are detailed in Section 3.3.1;

2. Submit to the responsible physician the results of the initial characterization analyses for each analyte for which determinations are to be made;

3. Submit to the responsible physician the results, for the initial 6-month period, of the internal QA/QC program for each analyte for which determinations are to be made (if no commercial analyses have been conducted previously, a minimum of 2 mock standardization trials for each analyte should be completed per month for a 6-month period;

4. Enroll in the CTQ program for the appropriate analyte for which determinations are to be made, and arrange to have the CTQ program submit the initial confirmation of participation and proficiency test results directly to the designated physicians. Note that the designated physician should receive results from 3 completed rounds from the CTQ program before approving a laboratory for participation in the biological monitoring program;

5. Laboratories seeking participation for CDU and/or B(2)MU analyses should submit to the responsible physician documentation of accreditation by the CAP for CRTU analyses performed in conjunction with CDU and/or B(2)MU determinations (if CRTU analyses are conducted by a contract laboratory, this laboratory should submit proof of CAP accreditation to the responsible physician); and,

6. Documentation should be submitted on an appropriate form.

To participate in CDB, CDU and/or B(2)MU analyses, the laboratory should satisfy the above criteria for a minimum of 2 of the 3 proficiency samples provided in each of the 3 rounds of the CTQ program over a 6-month period; this procedure should be completed for each appropriate analyte. Proficiency should be maintained for each analyte to continue participation. Note that laboratories seeking participation for CDU or B(2)MU also should address the performance requirements for CRTU, which involves providing evidence of accreditation by the CAP and participation in the CAP surveys (or an equivalent program).

The performance requirement for CDB analysis is defined as an analytical result within + or - 1 ug/l or 15% of the consensus mean (whichever is greater). For samples exhibiting a consensus mean less than 1 ug/l, the performance requirement is defined as a concentration between the detection limit of the analysis and a maximum of 2 ug/l. The purpose of redefining the acceptable interval for low CDB values is to encourage proper reporting of the actual values obtained during measurement; laboratories, therefore, will not be penalized (in terms of a narrow range of acceptability) for reporting measured concentrations less than 1 ug/l.

The performance requirement for CDU analysis is defined as an analytical result within + or - 1 ug/l urine or 15% of the consensus mean (whichever is greater). For samples exhibiting a consensus mean less than 1 ug/l urine, the performance requirement is defined as a concentration that falls between the detection limit of the analysis and a maximum of 2 ug/l urine. Performance requirements for the companion CRTU analysis (defined by the CAP) also should be met. Note that reporting CDU results, other than for CTQ proficiency testing should be accompanied with results of CRTU analyses, and these 2 sets of results should be combined to provide a measure of CDU in units of ug/g CRTU.

The performance requirement for B(2)MU is defined as an analytical result within + or - 15% of the consensus mean. Note that reporting B(2)MU results, other than for CTQ proficiency testing should be accompanied with results of CRTU analysis, these 2 sets of results should be combined to provide a measure of B(2)MU in units of ug/g CRTU.

Once a new laboratory has been approved by the responsible physician for conducting analyte determinations, the status of this approval should be reviewed periodically by the responsible physician as per the criteria presented under Section 3.2.2.

Laboratories which have failed previously to gain approval of the responsible physician for conducting determinations of 1 or more analytes due to lack of compliance with the criteria defined above for existing laboratories (Section 3.2.1), may obtain approval by satisfying the criteria for newly-formed laboratories defined under this section; for these laboratories, the second of the above criteria may be satisfied by submitting a new set of characterization analyses for each analyte for which determinations are to be made.

Reevaluation of these laboratories is discretionary on the part of the responsible physician. Reevaluation, which normally takes about 6 months, may be expedited if the laboratory can achieve 100% compliance with the proficiency test criteria using the 6 samples of each analyte submitted to the CTQ program during the first 2 rounds of proficiency testing.

For laboratories seeking reevaluation for CDU or B(2)MU analysis, the guidelines for CRTU analyses also should be satisfied, including accreditation for CRTU analysis by the CAP, and participation in the CAP survey program (or accreditation/participation in an equivalent program).

3.2.4 Future Modifications to the Protocol Guidelines

As participating laboratories gain experience with analyses for CDB, CDU and B(2)MU, it is anticipated that the performance achievable by the majority of laboratories should improve until it approaches that reported by the research groups which developed each method. OSHA, therefore, may choose to recommend stricter performance guidelines in the future as the overall performance of participating laboratories improves.

3.3 Guidelines for Record Keeping and Reporting

To comply with these guidelines, participating laboratories should satisfy the above-stated performance and proficiency recommendations, as well as the following internal QA/QC, record keeping, and reporting provisions.

If a participating laboratory fails to meet the provisions of these guidelines, it is recommended that the responsible physician disapprove further analyses of biological samples by that laboratory until it demonstrates compliance with these guidelines. On disapproval, biological samples should be sent to a laboratory that can demonstrate compliance with these guidelines, at least until the former laboratory is reevaluated by the responsible physician and found to be in compliance.

The following record keeping and reporting procedures should be practiced by participating laboratories.

3.3.1 Internal Quality Assurance/Quality Control Procedures

Laboratories participating in the cadmium monitoring program should develop and maintain an internal quality assurance/quality control (QA/QC) program that incorporates procedures for establishing and maintaining control for each of the analytic procedures (determinations of CDB, CDU and/or B(2)MU) for which the laboratory is seeking participation. For laboratories analyzing CDU and/or B(2)MU, a QA/QC program for CRTU also should be established.

Written documentation of QA/QC procedures should be described in a formal QA/QC plan; this plan should contain the following information: Sample acceptance and handling procedures (i.e., chain-of-custody); sample preparation procedures; instrument parameters; calibration procedures; and, calculations. Documentation of QA/QC procedures should be sufficient to identify analytical problems, define criteria under which analysis of compliance samples will be suspended, and describe procedures for corrective actions.

3.3.1.1 QA/QC procedures for establishing control of CDB and CDU analyses

The QA/QC program for CDB and CDU should address, at a minimum, procedures involved in calibration, establishment of control limits, internal QC analyses and maintaining control, and corrective-action protocols. Participating laboratory should develop and maintain procedures to assure that analyses of compliance samples are within control limits, and that these procedures are documented thoroughly in a QA/QC plan.

A nonmandatory QA/QC protocol is presented in Attachment 1. This attachment is illustrative of the procedures that should be addressed in a proper QA/QC program.

Calibration. Before any analytic runs are conducted, the analytic instrument should be calibrated. Calibration should be performed at the beginning of each day on which QC and/or compliance samples are run. Once calibration is established, QC or compliance samples may be run. Regardless of the type of samples run, about every fifth sample should serve as a standard to assure that calibration is being maintained.

Calibration is being maintained if the standard is within + or - 15% of its theoretical value. If a standard is more than + or - 15% of its theoretical value, the run has exceeded control limits due to calibration error; the entire set of samples then should be reanalyzed after recalibrating or the results should be recalculated based on a statistical curve derived from that set of standards.

It is essential that the value of the highest standard analyzed be higher than the highest sample analyzed; it may be necessary, therefore, to run a high standard at the end of the run, which has been selected based on results obtained over the course of the run (i.e., higher than any standard analyzed to that point).

Standards should be kept fresh; as samples age, they should be compared with new standards and replaced if necessary.

Internal Quality Control Analyses. Internal QC samples should be determined interspersed with analyses of compliance samples. At a minimum, these samples should be run at a rate of 5% of the compliance samples or at least one set of QC samples per analysis of compliance samples, whichever is greater. If only 2 samples are run, they should contain different levels of cadmium.

Internal QC samples may be obtained as commercially-available reference materials and/or they may be internally prepared. Internally-prepared samples should be well characterized and traced, or compared to a reference material for which a consensus value is available.

Levels of cadmium contained in QC samples should not be known to the analyst prior to reporting the results of the analysis.

Internal QC results should be plotted or charted in a manner which describes sample recovery and laboratory control limits.

Internal Control Limits. The laboratory protocol for evaluating internal QC analyses per control limits should be clearly defined. Limits may be based on statistical methods (e.g., as 2 unbiased standard deviation from the laboratory mean recovery), or on proficiency testing limits (e.g., + or - 1 ug or 15% of the mean, whichever is greater). Statistical limits that exceed + or - 40% should be reevaluated to determine the source error in the analysis.

When laboratory limits are exceeded, analytic work should terminate until the source of error is determined and corrected; compliance samples affected by the error should be reanalyzed. In addition, the laboratory protocol should address any unusual trends that develop which may be biasing the results. Numerous, consecutive results above or below laboratory mean recoveries, or outside laboratory statistical limits, indicate that problems may have developed.

Corrective Actions. The QA/QC plan should document in detail specific actions taken if control limits are exceeded or unusual trends develop. Corrective actions should be noted on an appropriate form, accompanied by supporting documentation.

In addition to these actions, laboratories should include whatever additional actions are necessary to assure that accurate data are reported to the responsible physicians.

Reference Materials. The following reference materials may be available:

Cadmium in Blood (CDB)

1.	Centre de Toxicologie du Quebec, Le Centre Hospitalier de l'Universite Laval, 2705 boul. Laurier, Quebec, Que., Canada G1V 4G2. (Prepared 6 times per year at 1-15 ug Cd/l.)
2.	H. Marchandise, Community Bureau of Reference-BCR, Directorate General XII, Commission of the European Communities, 200, rue de la Loi, B-1049, Brussels, Belgium. (Prepared as Bl CBM-1 at 5.37 ug Cd/l, and Bl CBM-2 at 12.38 ug Cd/l.)
3.	Kaulson Laboratories Inc., 691 Bloomfield Ave., Caldwell, NJ 07006; tel: (201) 226-9494, FAX (201) 226-3244. (Prepared as #0141 [As, Cd, Hg, Pb] at 2 levels.)

Cadmium in Urine (CDU)

1.	Centre de Toxicologie du Quebec, Le Centre Hospitalier de l'Universite Laval, 2705 boul. Laurier, Quebec, Que., Canada G1V 4G2. (Prepared 6 times per year.)
2.	National Institute of Standards and Technology (NIST), Dept. of Commerce, Gaithersburg, MD; tel: (301) 975-6776. (Prepared as SRM 2670 freeze-dried urine [metals]; set includes normal and elevated levels of metals; cadmium is certified for elevated level of 88.0 ug/l in reconstituted urine.)
3.	Kaulson Laboratories Inc., 691 Bloomfield Ave., Caldwell, NJ 07006; tel: (201) 226-9494, FAX (201) 226-3244. (Prepared as #0140 [As, Cd, Hg, Pb] at 2 levels.)

3.3.1.2 QA/QC procedures for establishing control of B(2)MU

A written, detailed QA/QC plan for B(2)MU analysis should be developed. The QA/QC plan should contain a protocol similar to those protocols developed for the CDB/CDU analyses. Differences in analyses may warrant some differences in the QA/QC protocol, but procedures to ensure analytical integrity should be developed and followed.

Examples of performance summaries that can be provided include measurements of accuracy (i.e., the means of measured values verses target values for the control samples) and precision (i.e., based on duplicate analyses). It is recommended that the accuracy and precision measurements be compared to those reported as achievable by the Pharmacia Delphia kit (Pharmacia 1990) to determine if and when unsatisfactory analyses have arisen. If the measurement error of 1 or more of the control samples is more than 15%, the run exceeds control limits. Similarly, this decision is warranted when the average CV for duplicate samples is greater than 5%.

3.3.2 Procedures for Record Keeping

To satisfy reporting requirements for commercial analyses of CDB, CDU and/or B(2)MU performed for the medical monitoring program mandated under the cadmium rule, participating laboratories should maintain the following documentation for each analyte:

1. For each analytic instrument on which analyte determinations are made, records relating to the most recent calibration and QC sample analyses;
2. For these instruments, a tabulated record for each analyte of those determinations found to be within and outside of control limits over the past 2 years;
3. Results for the previous 2 years of the QC sample analyses conducted under the internal QA/QC program (this information should be: Provided for each analyte for which determinations are made and for each analytic instrument used for this purpose, sufficient to demonstrate that internal QA/QC programs are being executed properly, and consistent with data sent to responsible physicians).

4. Duplicate copies of monitoring results for each analyte sent to clients during the previous 5 years, as well as associated information; supporting material such as chain-of-custody forms also should be retained; and,

5. Proficiency test results and related materials received while participating in the CTQ interlaboratory program over the past 2 years; results also should be tabulated to provide a serial record of relative error (derived per Section 3.3.3 below).

3.3.3 Reporting Procedures

Participating laboratories should maintain these documents: QA/QC program plans; QA/QC status reports; CTQ proficiency program reports; and, analytical data reports. The information that should be included in these reports is summarized in Table 2; a copy of each report should be sent to the responsible physician.

TABLE 2
REPORTING PROCEDURES FOR LABORATORIES PARTICIPATING IN THE CADMIUM MEDICAL MONITORING PROGRAM

Report	Frequency (Time Frame)	Contents
1 QA/QC Program Plan	Once (initially)	A detailed description of the QA/QC protocol to be established by the laboratory to maintain control of analyte determinations.
2 QA/QC Status Report	Every 2 months	Results of the QC samples incorporated into regular runs for each instrument (over the period since the last report).
3 Proficiency Report	Attached to every data report	Results from the last full year of proficiency samples submitted to the CTQ program. Results of the 100 most recent QC samples incorporated into regular runs for each instrument.
4 Analytical Data Report	For all reports of data results	Date the sample was received. Date the sample was analyzed. Appropriate chain-of-custody information. Types of analyses performed. Results of the analyses. Copy of the most current proficiency report.

As noted in Section 3.3.1, a QA/QC program plan should be developed that documents internal QA/QC procedures (defined under Section 3.3.1) to be implemented by the participating laboratory for each analyte; this plan should provide a list identifying each instrument used in making analyte determinations.

A QA/QC status report should be written bimonthly for each analyte. In this report, the results of the QC program during the reporting period should be reported for each analyte in the following manner: The number (N) of QC samples analyzed during the period; a table of the target levels defined for each sample and the corresponding measured values; the mean of F/T value (as defined below) for the set of QC samples run during the period; and, use of the mean + or - 2 unbiased standard deviation (as defined below) for the set of QC samples run during the period as a measure of precision.

As noted in Section 2, an F/T value for a QC sample is the ratio of the measured concentration of analyte to the established (i.e., reference) concentration of analyte for that QC sample. The equation below describes the derivation of the mean for F/T values, the mean, (with N being the total number of samples analyzed):

$$\bar{X} = \frac{\Sigma(F/T)}{N}$$

The standard deviation, unbiased standard deviation, for these measurements is derived using the following equation (note that 2 unbiased standard deviation is twice this value):

$$\hat{\sigma} = \left[\frac{\Sigma(F/T - \bar{X})^2}{N-1}\right]^{\frac{1}{2}}$$

The nonmandatory QA/QC protocol (see Attachment 1) indicates that QC samples should be divided into several discrete pools, and a separate estimate of precision for each pool then should be derived. Several precision estimates should be provided for concentrations which differ in average value. These precision measures may be used to document improvements in performance with regard to the combined pool.

Participating laboratories should use the CTQ proficiency program for each analyte. Results of the this program will be sent by CTQ directly to physicians designated by the participating laboratories. Proficiency results from the CTQ program are used to establish the accuracy of results from each participating laboratory, and should be provided to responsible physicians for use in trend analysis. A proficiency report consisting of these proficiency results should accompany data reports as an attachment.

For each analyte, the proficiency report should include the results from the 6 previous proficiency rounds in the following format:

1. Number (N) of samples analyzed;
2. Mean of the target levels, (1/N) E (T(i), with T(i) being a consensus mean for the sample;
3. Mean of the measurements, (1/N) E M(i), with M(i) being a sample measurement;
4. A measure of error defined by:

$$(1/N)\ E\ (T(i) - M(i))(2)$$

Analytical data reports should be submitted to responsible physicians directly. For each sample, report the following information: The date the sample was received; the date the sample was analyzed; appropriate chain-of-custody information; the type(s) of analyses performed; and, the results of the analyses. This information should be reported on a form similar to the form provided or an appropriate form. The most recent proficiency program report should accompany the analytical data reports (as an attachment).

Confidence intervals for the analytical results should be reported as X + or - 2 unbiased standard deviation, with X being the measured value and 2 unbiased standard deviation the standard deviation calculated as described above.

For CDU or B(2)MU results, which are combined with CRTU measurements for proper reporting, the 95% confidence limits are derived from the limits for CDU or B(2)MU, (p), and the limits for CRTU, (q), as follows:

$$\frac{X}{Y} + \text{or} - \frac{(1)}{(Y(2))}\left(Y(2) \times p(2) + X(2) \times q(2)\right)^{1/2}$$

For these calculations, X + or - p is the measurement and confidence limits for CDU or B(2)MU, and Y + or - q is the measurement and confidence limit for CRTU.

Participating laboratories should notify responsible physicians as soon as they receive information indicating a change in their accreditation status with the CTQ or the CAP. These physicians should not be expected to wait until formal notice of a status change has been received from the CTQ or the CAP.

3.4 Instructions to Physicians

Physicians responsible for the medical monitoring of cadmium-exposed workers must collect the biological samples from workers; they then should select laboratories to perform the required analyses, and should interpret the analytic results.

3.4.1 Sample Collection and Holding Procedures

Blood Samples. The following procedures are recommended for the collection, shipment and storage of blood samples for CDB analysis to reduce analytical variability; these recommendations were obtained primarily through personal communications with J.P. Weber of the CTQ (1991), and from reports by the Centers for Disease Control (CDC, 1986) and Stoeppler and Brandt (1980).

To the extent possible, blood samples should be collected from workers at the same time of day. Workers should shower or thoroughly wash their hands and arms before blood samples are drawn. The following materials are needed for blood sample collection: Alcohol wipes; sterile gauze sponges; band-aids; 20 gauge, 1.5 - in. stainless steel needles (sterile); preprinted labels; tourniquets; vacutainer holders; 3 - ml "metal free" vacutainer tubes (i.e., dark-blue caps), with EDTA as an anti-coagulant; and, styrofoam vacutainer shipping containers.

Whole blood samples are taken by venipuncture. Each blue-capped tube should be labeled or coded for the worker and company before the sample is drawn. (Blue-capped tubes are recommended instead of red-capped tubes because the latter may consist of red coloring pigment containing cadmium, which could contaminate the samples.) Immediately after sampling, the vacutainer tubes must be thoroughly mixed by inverting the tubes at least 10 times manually or mechanically using a Vortex device (for 15 sec). Samples should be refrigerated immediately or stored on ice until they can be packed for shipment to the participating laboratory for analysis.

The CDC recommends that blood samples be shipped with a "cool pak" to keep the samples cold during shipment. However, the CTQ routinely ships and receives blood samples for cadmium analysis that have not been kept cool during shipment. The CTQ has found no deterioration of cadmium in biological fluids that were shipped via parcel post without a cooling agent, even though these deliveries often take 2 weeks to reach their destination.

Urine Samples. The following are recommended procedures for the collection, shipment and storage of urine for CDU and B(2)MU analyses, and were obtained primarily through personal communications with J.P. Weber of the CTQ (1991), and from reports by the CDC (1986) and Stoeppler and Brandt (1980).

Single "spot" samples are recommended. As B2M can degrade in the bladder, workers should first empty their bladder and then drink a large glass of water at the start of the visit. Urine samples then should be collected within 1 hour. Separate samples should be collected for CDU and B(2)MU using the following materials: Sterile urine collection cups (250 ml); small sealable plastic bags; preprinted labels; 15-ml polypropylene or polyethylene screw-cap tubes; lab gloves ("metal free"); and, preservatives (as indicated).

The sealed collection cup should be kept in the plastic bag until collection time. The workers should wash their hands with soap and water before receiving the collection cup. The collection cup should not be opened until just before voiding and the cup should be sealed immediately after filling. It is important that the inside of the container and cap are not touched by, or come into contact with, the body, clothing or other surfaces.

For CDU analyzes, the cup is swirled gently to resuspend any solids, and the 15-ml tube is filled with 10-12 ml urine. The CDC recommends the addition of 100 ul concentrated HNO(3) as a preservative before sealing the tube and then freezing the sample. The CTQ recommends minimal handling and does not acidify their interlaboratory urine reference materials prior to shipment, nor do they freeze the sample for shipment. At the CTQ, if the urine sample has much sediment, the sample is acidified in the lab to free any cadmium in the precipitate.

For B2M, the urine sample should be collected directly into a polyethylene bottle previously washed with dilute nitric acid. The pH of the urine should be measured and adjusted to 8.0 with 0.1 N NaOH immediately following collection. Samples should be frozen and stored at -20 deg. C until testing is performed. The B2M in the samples should be stable for 2 days when stored at 2-8 deg. C, and for at least 2 months at -20 deg. C. Repeated freezing and thawing should be avoided to prevent denaturing the B2M (Pharmacia 1990).

3.4.2 Recommendations for Evaluating Laboratories

Using standard error data and the results of proficiency testing obtained from CTQ, responsible physicians can make an informed choice of which laboratory to select to analyze biological samples. In general, laboratories with small standard errors and little disparity between target and measured values tend to make precise and accurate sample determinations. Estimates of precision provided to the physicians with each set of monitoring results can be compared to previously-reported proficiency and precision estimates. The latest precision estimates should be at least as small as the standard error reported previously by the laboratory. Moreover, there should be no indication that precision is deteriorating (i.e., increasing values for the precision estimates). If precision is deteriorating, physicians may decide to use another laboratory for these analyses. QA/QC information provided by the participating laboratories to physicians can, therefore, assist physicians in evaluating laboratory performance.

3.4.3 Use and Interpretation of Results

When the responsible physician has received the CDB, CDU and/or B(2)MU results, these results must be compared to the action levels discussed in the final rule for cadmium. The comparison of the sample results to action levels is straightforward. The measured value reported from the laboratory can be compared directly to the action levels; if the reported value exceeds an action level, the required actions must be initiated.

4.0 BACKGROUND

Cadmium is a naturally-occurring environmental contaminant to which humans are continually exposed in food, water, and air. The average daily intake of cadmium by the U.S. population is estimated to be 10-20 ug/day. Most of this intake is via ingestion, for which absorption is estimated at 4-7% (Kowal et al. 1979). An additional nonoccupational source of cadmium is smoking tobacco; smoking a pack of cigarettes a day adds an additional 2-4 ug cadmium to the daily intake, assuming absorption via inhalation of 25-35% (Nordberg and Nordberg 1988; Friberg and Elinder 1988; Travis and Haddock 1980).

Exposure to cadmium fumes and dusts in an occupational setting where air concentrations are 20-50 ug/m(3) results in an additional daily intake of several hundred micrograms (Friberg and Elinder 1988, p. 563). In such a setting, occupational exposure to cadmium occurs primarily via inhalation, although additional exposure may occur through the ingestion of material via contaminated hands if workers eat or smoke without first washing. Some of the particles that are inhaled initially may be ingested when the material is deposited in the upper respiratory tract, where it may be cleared by mucociliary transport and subsequently swallowed.

Cadmium introduced into the body through inhalation or ingestion is transported by the albumin fraction of the blood plasma to the liver, where it accumulates and is stored principally as a bound form complexed with the protein metallothionein. Metallothionein-bound cadmium is the main form of cadmium subsequently transported to the kidney; it is these 2 organs, the liver and kidney, in which the majority of the cadmium body burden accumulates. As much as one half of the total body burden of cadmium may be found in the kidneys (Nordberg and Nordberg 1988).

Once cadmium has entered the body, elimination is slow; about 0.02% of the body burden is excreted per day via urinary/fecal elimination. The whole-body half-life of cadmium is 10-35 years, decreasing slightly with increasing age (Travis and Haddock 1980).

The continual accumulation of cadmium is the basis for its chronic noncarcinogenic toxicity. This accumulation makes the kidney the target organ in which cadmium toxicity usually is first observed (Piscator 1964). Renal damage may occur when cadmium levels in the kidney cortex approach 200 ug/g wet tissue-weight (Travis and Haddock 1980).

The kinetics and internal distribution of cadmium in the body are complex, and depend on whether occupational exposure to cadmium is ongoing or has terminated. In general, cadmium in blood is related principally to recent cadmium exposure, while cadmium in urine reflects cumulative exposure (i.e., total body burden)(Lauwerys et al. 1976; Friberg and Elinder 1988).

4.1 Health Effects

Studies of workers in a variety of industries indicate that chronic exposure to cadmium may be linked to several adverse health effects including kidney dysfunction, reduced pulmonary function, chronic lung disease and cancer (Federal Register 1990). The primary sites for cadmium-associated cancer appear to be the lung and the prostate. Cancer. Evidence for an association between cancer and cadmium exposure comes from both epidemiological studies and animal experiments. Pott (1965) found a statistically significant elevation in the incidence of prostate cancer among a cohort of cadmium workers. Other epidemiology studies also report an elevated incidence of prostate cancer; however, the increases observed in these other studies were not statistically significant (Meridian Research, Inc. 1989).

One study (Thun et al. 1985) contains sufficiently quantitative estimates of cadmium exposure to allow evaluation of dose-response relationships between cadmium exposure and lung cancer. A statistically significant excess of lung cancer attributed to cadmium exposure was found in this study, even after accounting for confounding variables such as coexposure to arsenic and smoking habits (Meridian Research, Inc. 1989).

Evidence for quantifying a link between lung cancer and cadmium exposure comes from a single study (Takenaka et al. 1983). In this study, dose-response relationships developed from animal data were extrapolated to humans using a variety of models. OSHA chose the multistage risk model for estimating the risk of cancer for humans using these animal data. Animal injection studies also suggest an association between cadmium exposure and cancer, particularly observations of an increased incidence of tumors at sites remote from the point of injection. The International Agency for Research on Cancer (IARC) (Supplement 7, 1987) indicates that this, and related, evidence is sufficient to classify cadmium as an animal carcinogen. However, the results of these injection studies cannot be used to quantify risks attendant to human occupational exposures due to differences in routes of exposure (Meridian Research, Inc. 1989).

Based on the above-cited studies, the U.S. Environmental Protection Agency (EPA) classifies cadmium as "B1," a probable human carcinogen (USEPA 1985). IARC in 1987 recommended that cadmium be listed as a probable human carcinogen.

Kidney Dysfunction. The most prevalent nonmalignant effect observed among workers chronically exposed to cadmium is kidney dysfunction. Initially, such dysfunction is manifested by proteinuria (Meridian Research, Inc. 1989; Roth Associates, Inc. 1989). Proteinuria associated with cadmium exposure is most commonly characterized by excretion of low-molecular weight proteins (15,000-40,000 MW), accompanied by loss of electrolytes, uric acid, calcium, amino acids, and phosphate. Proteins commonly excreted include B-2-microglobulin (B2M), retinol binding protein (RBP), immunoglobulin light chains, and lysozyme. Excretion of low molecular weight proteins is characteristic of damage to the proximal tubules of the kidney (Iwao et al. 1980).

Exposure to cadmium also may lead to urinary excretion of high- molecular weight proteins such as albumin, immunoglobulin G, and glycoproteins (Meridian Research, Inc. 1989; Roth Associates, Inc. 1989). Excretion of high-molecular weight proteins is indicative of damage to the glomeruli of the kidney. Bernard et al. (1979) suggest that cadmium-associated damage to the glomeruli and damage to the proximal tubules of the kidney develop independently of each other, but may occur in the same individual.

Several studies indicate that the onset of low-molecular weight proteinuria is a sign of irreversible kidney damage (Friberg et al. 1974; Roels et al. 1982; Piscator 1984; Elinder et al. 1985; Smith et al. 1986). For many workers, once sufficiently elevated levels of B2M are observed in association with cadmium exposure, such levels do not appear to return to normal even when cadmium exposure is eliminated by removal of the worker from the cadmium-contaminated work environment (Friberg, exhibit 29, 1990).

Some studies indicate that cadmium-induced proteinuria may be progressive; levels of B(2)MU increase even after cadmium exposure has ceased (Elinder et al. 1985). Other researchers have reached similar conclusions (Frieburg testimony, OSHA docket exhibit 29, Elinder testimony, OSHA docket exhibit 55, and OSHA docket exhibits 8-86B). Such observations are not universal, however (Smith et al. 1986; Tsuchiya 1976). Studies in which proteinuria has not been observed, however, may have initiated the reassessment too early (Meridian Research, Inc. 1989; Roth Associates, Inc. 1989; Roels 1989).

A quantitative assessment of the risks of developing kidney dysfunction as a result of cadmium exposure was performed using the data from Ellis et al. (1984) and Falck et al. (1983). Meridian Research, Inc. (1989) and Roth Associates, Inc. (1989) employed several mathematical models to evaluate the data from the 2 studies, and the results indicate that cumulative cadmium exposure levels between 5 and 100 ug-years/m(3) correspond with a one-in-a-thousand probability of developing kidney dysfunction.

When cadmium exposure continues past the onset of early kidney damage (manifested as proteinuria), chronic nephrotoxicity may occur (Meridian Research, Inc. 1989; Roth Associates, Inc. 1989). Uremia, which is the loss of the glomerulus' ability to adequately filter blood, may result. This condition leads to severe disturbance of electrolyte concentrations, which may result in various clinical complications including atherosclerosis, hypertension, pericarditis, anemia, hemorrhagic tendencies, deficient cellular immunity, bone changes, and other problems. Progression of the disease may require dialysis or a kidney transplant.

Studies in which animals are chronically exposed to cadmium confirm the renal effects observed in humans (Friberg et al. 1986). Animal studies also confirm cadmium-related problems with calcium metabolism and associated skeletal effects, which also have been observed among humans. Other effects commonly reported in chronic animal studies include anemia, changes in liver morphology, immunosuppression and hypertension. Some of these effects may be associated with cofactors; hypertension, for example, appears to be associated with diet, as well as with cadmium exposure. Animals injected with cadmium also have shown testicular necrosis.

4.2 Objectives for Medical Monitoring

In keeping with the observation that renal disease tends to be the earliest clinical manifestation of cadmium toxicity, the final cadmium standard mandates that eligible workers must be medically monitored to prevent this condition (as well as cadmium-induced cancer). The objectives of medical-monitoring, therefore, are to: Identify workers at significant risk of adverse health effects from excess, chronic exposure to cadmium; prevent future cases of cadmium-induced disease; detect and minimize existing cadmium-induced disease; and, identify workers most in need of medical intervention.

The overall goal of the medical monitoring program is to protect workers who may be exposed continuously to cadmium over a 45-year occupational lifespan. Consistent with this goal, the medical monitoring program should assure that:

1. Current exposure levels remain sufficiently low to prevent the accumulation of cadmium body burdens sufficient to cause disease in the future by monitoring CDB as an indicator of recent cadmium exposure;
2. Cumulative body burdens, especially among workers with undefined historical exposures, remain below levels potentially capable of leading to damage and disease by assessing CDU as an indicator of cumulative exposure to cadmium; and,
3. Health effects are not occurring among exposed workers by determining B(2)MU as an early indicator of the onset of cadmium-induced kidney disease.

4.3 Indicators of Cadmium Exposure and Disease

Cadmium is present in whole blood bound to albumin, in erythrocytes, and as a metallothionein-cadmium complex. The metallothionein-cadmium complex that represents the primary transport mechanism for cadmium delivery to the kidney. CDB concentrations in the general, nonexposed population average 1 ug Cd/l whole blood, with smokers exhibiting higher levels (see Section 5.1.6). Data presented in Section 5.1.6 shows that 95% of the general population not occupationally exposed to cadmium have CDB levels less than 5 ug Cd/l. If total body burdens of cadmium remain low, CDB concentrations indicate recent exposure (i.e., daily intake). This conclusion is based on data showing that cigarette smokers exhibit CDB concentrations of 2-7 ug/l depending on the number of cigarettes smoked per day (Nordberg and Nordberg 1988), while CDB levels for those who quit smoking return to general population values (approximately 1 ug/l) within several weeks (Lauwerys et al. 1976). Based on these observations, Lauwerys et al. (1976) concluded that CDB has a biological half-life of a few weeks to less than 3 months. As indicated in Section 3.1.6, the upper 95th percentile for CDB levels observed among those who are not occupationally exposed to cadmium is 5 ug/l, which suggests that the absolute upper limit to the range reported for smokers by Nordberg and Nordberg may have been affected by an extreme value (i.e., beyond 2 o(sigma) above the mean).

Among occupationally-exposed workers, the occupational history of exposure to cadmium must be evaluated to interpret CDB levels. New workers, or workers with low exposures to cadmium, exhibit CDB levels that are representative of recent exposures, similar to the general population. However, for workers with a history of chronic exposure to cadmium, who have accumulated significant stores of cadmium in the kidneys/liver, part of the CDB concentrations appear to indicate body burden. If such workers are removed from cadmium exposure, their CDB levels remain elevated, possibly for years, reflecting prior long-term accumulation of cadmium in body tissues. This condition tends to occur, however, only beyond some threshold exposure value, and possibly indicates the capacity of body tissues to accumulate cadmium which cannot be excreted readily (Friberg and Elinder 1988; Nordberg and Nordberg 1988).

CDU is widely used as an indicator of cadmium body burdens (Nordberg and Nordberg 1988). CDU is the major route of elimination and, when CDU is measured, it is commonly expressed either as ug Cd/l urine (unadjusted), ug Cd/l urine (adjusted for specific gravity), or ug Cd/g CRTU (see Section 5.2.1). The metabolic model for CDU is less complicated than CDB, since CDU is dependent in large part on the body (i.e., kidney) burden of cadmium. However, a small proportion of CDU still be attributed to recent cadmium exposure, particularly if exposure to high airborne concentrations of cadmium occurred. Note that CDU is subject to larger interindividual and day-to-day variations than CDB, so repeated measurements are recommended for CDU evaluations.

CDU is bound principally to metallothionein, regardless of whether the cadmium originates from metallothionein in plasma or from the cadmium pool accumulated in the renal tubules. Therefore, measurement of metallothionein in urine may provide information similar to CDU, while avoiding the contamination problems that may occur during collection and handling urine for cadmium analysis (Nordberg and Nordberg 1988). However, a commercial method for the determination of metallothionein at the sensitivity levels required under the final cadmium rule is not currently available; therefore, analysis of CDU is recommended.

Among the general population not occupationally exposed to cadmium, CDU levels average less than 1 ug/l (see Section 5.2.7). Normalized for creatinine (CRTU), the average CDU concentration of the general population is less than 1 ug/g CRTU. As cadmium accumulates over the lifespan, CDU increases with age. Also, cigarette smokers may eventually accumulate twice the cadmium body burden of nonsmokers, CDU is slightly higher in smokers than in nonsmokers, even several years after smoking cessation (Nordberg and Nordberg 1988). Despite variations due to age and smoking habits, 95% of those not occupationally exposed to cadmium exhibit levels of CDU less than 3 ug/g CRTU (based on the data presented in Section 5.2.7).

About 0.02% of the cadmium body burden is excreted daily in urine. When the critical cadmium concentration (about 200 ppm) in the kidney is reached, or if there is sufficient cadmium-induced kidney dysfunction, dramatic increases in CDU are observed (Nordberg and Nordberg 1988). Above 200 ppm, therefore, CDU concentrations cease to be an indicator of cadmium body burden, and are instead an index of kidney failure.

Proteinuria is an index of kidney dysfunction, and is defined by OSHA to be a material impairment. Several small proteins may be monitored as markers for proteinuria. Below levels indicative of proteinuria, these small proteins may be early indicators of increased risk of cadmium-induced renal tubular disease. Analytes useful for monitoring cadmium-induced renal tubular damage include:

1. B-2-Microglobulin (B2M), currently the most widely used assay for detecting kidney dysfunction, is the best characterized analyte available (Iwao et al. 1980; Chia et al. 1989);

2. Retinol Binding Protein (RBP) is more stable than B2M in acidic urine (i.e., B2M breakdown occurs if urinary pH is less than 5.5; such breakdown may result in false [i.e., low] B2M values [Bernard and Lauwerys, 1990]);

3. N-Acetyl-B-Glucosaminidase (NAG) is the analyte of an assay that is simple, inexpensive, reliable, and correlates with cadmium levels under 10 ug/g CRTU, but the assay is less sensitive than RBP or B2M (Kawada et al. 1989);

4. Metallothionein (MT) correlates with cadmium and B2M levels, and may be a better predictor of cadmium exposure than CDU and B2M (Kawada et al. 1989);

5. Tamm-Horsfall Glycoprotein (THG) increases slightly with elevated cadmium levels, but this elevation is small compared to increases in urinary albumin, RBP, or B2M (Bernard and Lauwerys 1990);

6. Albumin (ALB), determined by the biuret method, is not sufficiently sensitive to serve as an early indicator of the onset of renal disease (Piscator 1962);

7. Albumin (ALB), determined by the Amido Black method, is sensitive and reproducible, but involves a time-consuming procedure (Piscator 1962);

8. Glycosaminoglycan (GAG) increases among cadmium workers, but the significance of this effect is unknown because no relationship has been found between elevated GAG and other indices of tubular damage (Bernard and Lauwerys 1990);

9. Trehalase seems to increase earlier than B2M during cadmium exposure, but the procedure for analysis is complicated and unreliable (Iwata et al. 1988); and,

10. Kallikrein is observed at lower concentrations among cadmium- exposed workers than among normal controls (Roels et al. 1990).

Of the above analytes, B2M appears to be the most widely used and best characterized analyte to evaluate the presence/absence, as well as the extent of, cadmium-induced renal tubular damage (Kawada, Koyama, and Suzuki 1989; Shaikh and Smith 1984; Nogawa 1984). However, it is important that samples be collected and handled so as to minimize B2M degradation under acidic urine conditions.

The threshold value of B(2)MU commonly used to indicate the presence of kidney damage 300 ug/g CRTU (Kjellstrom et al. 1977a; Buchet et al. 1980; and Kowal and Zirkes 1983). This value represents the upper 95th or 97.5th percentile level of urinary excretion observed among those without tubular dysfunction (Elinder, exbt L-140-45, OSHA docket H057A). In agreement with these conclusions, the data presented in Section 5.3.7 of this protocol generally indicate that the level of 300 ug/g CRTU appears to define the boundary for kidney dysfunction. It is not clear, however, that this level represents the upper 95th percentile of values observed among those who fail to demonstrate proteinuria effects.

Although elevated B(2)MU levels appear to be a fairly specific indicator of disease associated with cadmium exposure, other conditions that may lead to elevated B(2)MU levels include high fevers from influenza, extensive physical exercise, renal disease unrelated to cadmium exposure, lymphomas, and AIDS (Iwao et al. 1980; Schardun and van Epps 1987). Elevated B2M levels observed in association with high fevers from influenza or from extensive physical exercise are transient, and will return to normal levels once the fever has abated or metabolic rates return to baseline values following exercise.

The other conditions linked to elevated B2M levels can be diagnosed as part of a properly-designed medical examination. Consequently, monitoring B2M, when accompanied by regular medical examinations and CDB and CDU determinations (as indicators of present and past cadmium exposure), may serve as a specific, early indicator of cadmium-induced kidney damage.

4.4 Criteria for Medical Monitoring of Cadmium Workers

Medical monitoring mandated by the final cadmium rule includes a combination of regular medical examinations and periodic monitoring of 3 analytes: CDB, CDU and B(2)MU. As indicated above, CDB is monitored as an indicator of current cadmium exposure, while CDU serves as an indicator of the cadmium body burden; B(2)MU is assessed as an early marker of irreversible kidney damage and disease.

The final cadmium rule defines a series of action levels that have been developed for each of the 3 analytes to be monitored. These action levels serve to guide the responsible physician through a decision-making process. For each action level that is exceeded, a specific response is mandated. The sequence of action levels, and the attendant actions, are described in detail in the final cadmium rule.

Other criteria used in the medical decision-making process relate to tests performed during the medical examination (including a determination of the ability of a worker to wear a respirator). These criteria, however, are not affected by the results of the analyte determinations addressed in the above paragraphs and, consequently, will not be considered further in these guidelines.

4.5 Defining to Quality and Proficiency of the Analyte Determinations

As noted above in Sections 2 and 3, the quality of a measurement should be defined along with its value to properly interpret the results. Generally, it is necessary to know the accuracy and the precision of a measurement before it can be properly evaluated. The precision of the data from a specific laboratory indicates the extent to which the repeated measurements of the same sample vary within that laboratory. The accuracy of the data provides an indication of the extent to which these results deviate from average results determined from many laboratories performing the same measurement (i.e., in the absence of an independent determination of the true value of a measurement). Note that terms are defined operationally relative to the manner in which they will be used in this protocol. Formal definitions for the terms in italics used in this section can be found in the list of definitions (Section 2).

Another data quality criterion required to properly evaluate measurement results is the limit of detection of that measurement. For measurements to be useful, the range of the measurement which is of interest for biological monitoring purposes must lie entirely above the limit of detection defined for that measurement.

The overall quality of a laboratory's results is termed the performance of that laboratory. The degree to which a laboratory satisfies a minimum performance level is referred to as the proficiency of the laboratory. A successful medical monitoring program, therefore, should include procedures developed for monitoring and recording laboratory performance; these procedures can be used to identify the most proficient laboratories.

5.0 Overview of Medical Monitoring Tests for CDB, CDU, B(2)MU and CRTU

To evaluate whether available methods for assessing CDB, CDU, B(2)MU and CRTU are adequate for determining the parameters defined by the proposed action levels, it is necessary to review procedures available for sample collection, preparation and analysis. A variety of techniques for these purposes have been used historically for the determination of cadmium in biological matrices (including CDB and CDU), and for the determination of specific proteins in biological matrices (including B(2)MU). However, only the most recent techniques are capable of satisfying the required accuracy, precision and sensitivity (i.e., limit of detection) for monitoring at the levels mandated in the final cadmium rule, while still facilitating automated analysis and rapid processing.

5.1 Measuring Cadmium in Blood (CDB)

Analysis of biological samples for cadmium requires strict analytical discipline regarding collection and handling of samples. In addition to occupational settings, where cadmium contamination would be apparent, cadmium is a ubiquitous environmental contaminant, and much care should be exercised to ensure that samples are not contaminated during collection, preparation or analysis. Many common chemical reagents are contaminated with cadmium at concentrations that will interfere with cadmium analysis; because of the widespread use of cadmium compounds as colored pigments in plastics and coatings, the analyst should continually monitor each manufacturer's chemical reagents and collection containers to prevent contamination of samples.

Guarding against cadmium contamination of biological samples is particularly important when analyzing blood samples because cadmium concentrations in blood samples from nonexposed populations are generally less than 2 ug/l (2 ng/ml), while occupationally-exposed workers can be at medical risk to cadmium toxicity if blood concentrations exceed 5 ug/l (ACGIH 1991 and 1992). This narrow margin between exposed and unexposed samples requires that exceptional care be used in performing analytic determinations for biological monitoring for occupational cadmium exposure.

Methods for quantifying cadmium in blood have improved over the last 40 years primarily because of improvements in analytical instrumentation. Also, due to improvements in analytical techniques, there is less need to perform extensive multi-step sample preparations prior to analysis. Complex sample preparation was previously required to enhance method sensitivity (for cadmium), and to reduce interference by other metals or components of the sample.

5.1.1 Analytical Techniques Used to Monitor Cadmium in Biological Matrices

TABLE 3
COMPARISON OF ANALYTICAL PROCEDURES/INSTRUMENTATION FOR DETERMINATION OF CADMIUM IN BIOLOGICAL SAMPLES

Analytical procedure	Limit of detection [ng/ (g or ml)]	Specified biological matrix	Reference	Comments
Flame Atomic Absorption Spectroscopy (FAAS).	|> or = 1.0	Any Matrix	Perkin- Elmer (1982)	Not sensitive enough for biomonitoring without extensive sample digestion metal chelation and organic solvent extraction.
Graphite Furnace Atomic	0.04	Urine	Pruszkowska et al (1983)	Methods of choice for routine cadmium analysis.
Absorption Spectroscopy (GFAAS).	|> or = 0.20	Blood	Stoeppler and Brandt (1980)	
Inductively-Coupled Argon Plasma Atomic Emission Spectroscopy (ICAP AES).	2.0	Any matrix	NIOSH (1984A)	Requires extensive sample preparation and concentration of metal with chelating resin. Advantage is simultaneous analyses for as many as 10 metals from 1 sample.
Neutron Activation Gamma Spectroscopy NA).	1.5	In vivo (liver)	Ellis et al. (1983)	Only available in vivo method for direct determination of cadmium body tissue burdens; expensive; absolute determination of cadmium in reference materials.
Isotope Dilution Mass Spectroscopy (IDMS).	< 1.0	Any matrix	Michiels and DeBievre (1986)	Suitable for absolute determination of cadmium in reference materials; expensive.
Differential Pulse Anodic Stripping Voltammetry (DPASV).	< 1.0	Any matrix	Stoeppler and Brandt (1980)	Suitable for absolute determination of cadmium in reference materials; efficient method to check accuracy of analytical method.

A number of analytical techniques have been used for determining cadmium concentrations in biological materials. A summary of the characteristics of the most widely employed techniques is presented in Table 3. The technique most suitable for medical monitoring for cadmium is atomic absorption spectroscopy (AAS).

To obtain a measurement using AAS, a light source (i.e., hollow cathode or lectrode-free discharge lamp) containing the element of interest as the cathode, is energized and the lamp emits a spectrum that is unique for that element. This light source is focused through a sample cell, and a selected wavelength is monitored by a monochrometer and photodetector cell. Any ground state atoms in the sample that match those of the lamp element and are in the path of the emitted light may absorb some of the light and decrease the amount of light that reaches the photodetector cell. The amount of light absorbed at each characteristic wavelength is proportional to the number of ground state atoms of the corresponding element that are in the pathway of the light between the source and detector.

To determine the amount of a specific metallic element in a sample using AAS, the sample is dissolved in a solvent and aspirated into a high-temperature flame as an aerosol. At high temperatures, the solvent is rapidly evaporated or decomposed and the solute is initially solidified; the majority of the sample elements then are transformed into an atomic vapor. Next, a light beam is focused above the flame and the amount of metal in the sample can be determined by measuring the degree of absorbance of the atoms of the target element released by the flame at a characteristic wavelength.

A more refined atomic absorption technique, flameless AAS, substitutes an electrothermal, graphite furnace for the flame. An aliquot (10-100 ul) of the sample is pipetted into the cold furnace, which is then heated rapidly to generate an atomic vapor of the element.

AAS is a sensitive and specific method for the elemental analysis of metals; its main drawback is nonspecific background absorption and scattering of the light beam by particles of the sample as it decomposes at high temperatures; nonspecific absorbance reduces the sensitivity of the analytical method. The problem of nonspecific absorbance and scattering can be reduced by extensive sample pretreatment, such as ashing and/or acid digestion of the sample to reduce its organic content.

Current AAS instruments employ background correction devices to adjust electronically for background absorption and scattering. A common method to correct for background effects is to use a deuterium arc lamp as a second light source. A continuum light source, such as the deuterium lamp, emits a broad spectrum of wavelengths instead of specific wavelengths characteristic of a particular element, as with the hollow cathode tube. With this system, light from the primary source and the continuum source are passed alternately through the sample cell. The target element effectively absorbs light only from the primary source (which is much brighter than the continuum source at the characteristic wavelengths), while the background matrix absorbs and scatters light from both sources equally. Therefore, when the ratio of the two beams is measured electronically, the effect of nonspecific background absorption and scattering is eliminated. A less common, but more sophisticated, background correction system is based on the Zeeman effect, which uses a magnetically-activated light polarizer to compensate electronically for nonspecific absorption and scattering.

Atomic emission spectroscopy with inductively-coupled argon plasma (AES-ICAP) is widely used to analyze for metals. With this instrument, the sample is aspirated into an extremely hot argon plasma flame, which excites the metal atoms; emission spectra specific for the sample element then are generated. The quanta of emitted light passing through a monochrometer are amplified by photomultiplier tubes and measured by a photodetector to determine the amount of metal in the sample. An advantage of AES-ICAP over AAS is that multi-elemental analyses of a sample can be performed by simultaneously measuring specific elemental emission energies. However, AES-ICAP lacks the sensitivity of AAS, exhibiting a limit of detection which is higher than the limit of detection for graphite-furnace AAS (Table 3).

Neutron activation (NA) analysis and isotope dilution mass spectrometry (IDMS) are 2 additional, but highly specialized, methods that have been used for cadmium determinations. These methods are expensive because they require elaborate and sophisticated instrumentation.

NA analysis has the distinct advantage over other analytical methods of being able to determine cadmium body burdens in specific organs (e.g., liver, kidney) in vivo (Ellis et al. 1983). Neutron bombardment of the target transforms cadmium-113 to cadmium-114, which promptly decays (< 10(-14) sec) to its ground state, emitting gamma rays that are measured using large gamma detectors; appropriate shielding and instrumentation are required when using this method.

IDMS analysis, a definitive but laborious method, is based on the change in the ratio of 2 isotopes of cadmium (cadmium 111 and 112) that occurs when a known amount of the element (with an artificially altered ratio of the same isotopes [i.e., a cadmium 111 "spike"] is added to a weighed aliquot of the sample (Michiels and De Bievre 1986).

5.1.2 Methods Developed for CDB Determinations

A variety of methods have been used for preparing and analyzing CDB samples; most of these methods rely on one of the analytical techniques described above. Among the earliest reports, Princi (1947) and Smith et al. (1955) employed a colorimetric procedure to analyze for CDB and CDU. Samples were dried and digested through several cycles with concentrated mineral acids (HNO(3) and H(2)SO(4)) and hydrogen peroxide (H(2)O(2)). The digest was neutralized, and the cadmium was complexed with diphenylthiocarbazone and extracted with chloroform. The dithizone-cadmium complex then was quantified using a spectrometer.

Colorimetric procedures for cadmium analyses were replaced by methods based on atomic absorption spectroscopy (AAS) in the early 1960s, but many of the complex sample preparation procedures were retained. Kjellstrom (1979) reports that in Japanese, American and Swedish laboratories during the early 1970s, blood samples were wet ashed with mineral acids or ashed at high temperature and wetted with nitric acid. The cadmium in the digest was complexed with metal chelators including diethyl dithiocarbamate (DDTC), ammonium pyrrolidine dithiocarbamate (APDC) or diphenylthiocarbazone (dithizone) in ammonia-citrate buffer and extracted with methyl isobutyl ketone (MIBK). The resulting solution then was analyzed by flame AAS or graphite-furnace AAS for cadmium determinations using deuterium-lamp background correction.

In the late 1970s, researchers began developing simpler preparation procedures. Roels et al. (1978) and Roberts and Clark (1986) developed simplified digestion procedures. Using the Roberts and Clark method, a 0.5 ml aliquot of blood is collected and transferred to a digestion tube containing 1 ml concentrated HNO(3). The blood is then digested at 110 deg. C for 4 hours. The sample is reduced in volume by continued heating, and 0.5 ml 30% H(2)O(2) is added as the sample dries. The residue is dissolved in 5 ml dilute (1%) HNO(3), and 20 ul of sample is then analyzed by graphite-furnace AAS with deuterium-background correction.

The current trend in the preparation of blood samples is to dilute the sample and add matrix modifiers to reduce background interference, rather than digesting the sample to reduce organic content. The method of Stoeppler and Brandt (1980), and the abbreviated procedure published in the American Public Health Association's (APHA) Methods for Biological Monitoring (1988), are straightforward and are nearly identical. For the APHA method, a small aliquot (50-300 ul) of whole blood that has been stabilized with ethylenediaminetetraacetate (EDTA) is added to 1.0 ml 1M HNO(3), vigorously shaken and centrifuged. Aliquots (10-25 ul) of the supernatant then are then analyzed by graphite-furnace AAS with appropriate background correction.

Using the method of Stoeppler and Brandt (1980), aliquots (50-200 ul) of whole blood that have been stabilized with EDTA are pipetted into clean polystyrene tubes and mixed with 150-600 ul of 1M HNO(3). After vigorous shaking, the solution is centrifuged and a 10-25 ul aliquot of the supernatant then is analyzed by graphite-furnace AAS with appropriate background correction.

Claeys-Thoreau (1982) and DeBenzo et al. (1990) diluted blood samples at a ratio of 1:10 with a matrix modifier (0.2% Triton X-100, a wetting agent) for direct determinations of CDB. DeBenzo et al. also demonstrated that aqueous standards of cadmium, instead of spiked, whole-blood samples, could be used to establish calibration curves if standards and samples are treated with additional small volumes of matrix modifiers (i.e., 1% HNO(3), 0.2% ammonium hydrogenphosphate and 1 mg/ml magnesium salts.)

These direct dilution procedures for CDB analysis are simple and rapid. Laboratories can process more than 100 samples a day using a dedicated graphite-furnace AAS, an auto-sampler, and either a Zeeman- or a deuterium-background correction system. Several authors emphasize using optimum settings for graphite-furnace temperatures during the drying, charring, and atomization processes associated with the flameless AAS method, and the need to run frequent QC samples when performing automated analysis.

5.1.3 Sample Collection and Handling

Sample collection procedures are addressed primarily to identify ways to minimize the degree of variability that may be introduced by sample collection during medical monitoring. It is unclear at this point the extent to which collection procedures contribute to variability among CDB samples. Sources of variation that may result from sampling procedures include time-of-day effects and introduction of external contamination during the collection process. To minimize these sources, strict adherence to a sample collection protocol is recommended. Such a protocol must include provisions for thorough cleaning of the site from which blood will be extracted; also, every effort should be made to collect samples near the same time of day. It is also important to recognize that under the recent OSHA blood-borne pathogens standard (29 CFR 1910.1030), blood samples and certain body fluids must be handled and treated as if they are infectious.

5.1.4 Best Achievable Performance

The best achievable performance using a particular method for CDB determinations is assumed to be equivalent to the performance reported by research laboratories in which the method was developed.

For their method, Roberts and Clark (1986) demonstrated a limit of detection of 0.4 ug Cd/l in whole blood, with a linear response curve from 0.4 to 16.0 ug Cd/l. They report a coefficient of variation (CV) of 6.7% at 8.0 ug/l.

The APHA (1988) reports a range of 1.0-25 ug/l, with a CV of 7.3% (concentration not stated). Insufficient documentation was available to critique this method.

Stoeppler and Brandt (1980) achieved a detection limit of 0.2 ug Cd/l whole blood, with a linear range of 0.4-12.0 ug Cd/l, and a CV of 15-30%, for samples at < 1.0 ug/l. Improved precision (CV of 3.8%) was reported for CDB concentrations at 9.3 ug/l.

5.1.5 General Method Performance

For any particular method, the performance expected from commercial laboratories may be somewhat lower than that reported by the research laboratory in which the method was developed. With participation in appropriate proficiency programs and use of a proper in-house QA/QC program incorporating provisions for regular corrective actions, the performance of commercial laboratories is expected to approach that reported by research laboratories. Also, the results reported for existing proficiency programs serve as a gauge of the likely level of performance that currently can be expected from commercial laboratories offering these analyses.

Weber (1988) reports on the results of the proficiency program run by the Centre de Toxicologie du Quebec (CTQ). As indicated previously, participants in that program receive 18 blood samples per year having cadmium concentrations ranging from 0.2-20 ug/l. Currently, 76 laboratories are participating in this program. The program is established for several analytes in addition to cadmium, and not all of these laboratories participate in the cadmium proficiency-testing program.

Under the CTQ program, cadmium results from individual laboratories are compared against the consensus mean derived for each sample. Results indicate that after receiving 60 samples (i.e., after participation for approximately three years), 60% of the laboratories in the program are able to report results that fall within + or - ug/l or 15% of the mean, whichever is greater. (For this procedure, the 15% criterion was applied to concentrations exceeding 7 ug/l.) On any single sample of the last 20 samples, the percentage of laboratories falling within the specified range is between 55 and 80%.

The CTQ also evaluates the performance of participating laboratories against a less severe standard: + or - ug/l or 15% of the mean, whichever is greater (Weber 1988); 90% of participating laboratories are able to satisfy this standard after approximately 3 years in the program. (The 15% criterion is used for concentrations in excess of 13 ug/l.) On any single sample of the last 15 samples, the percentage of laboratories falling within the specified range is between 80 and 95% (except for a single test for which only 60% of the laboratories achieved the desired performance).

Based on the data presented in Weber (1988), the CV for analysis of CDB is nearly constant at 20% for cadmium concentrations exceeding 5 ug/l, and increases for cadmium concentrations below 5 ug/l. At 2 ug/l, the reported CV rises to approximately 40%. At 1 ug/l, the reported CV is approximately 60%.

Participating laboratories also tend to overestimate concentrations for samples exhibiting concentrations less than 2 ug/l (see Figure 11 of Weber 1988). This problem is due in part to the proficiency evaluation criterion that allows reporting a minimum + or - 2.0 ug/l for evaluated CDB samples. There is currently little economic or regulatory incentive for laboratories participating in the CTQ program to achieve greater accuracy for CDB samples containing cadmium at concentrations less than 2.0 ug/l, even if the laboratory has the experience and competency to distinguish among lower concentrations in the samples obtained from the CTQ.

The collective experience of international agencies and investigators demonstrate the need for a vigorous QC program to ensure that CDB values reported by participating laboratories are indeed reasonably accurate. As Friberg (1988) stated:

"Information about the quality of published data has often been lacking. This is of concern as assessment of metals in trace concentrations in biological media are fraught with difficulties from the collection, handling, and storage of samples to the chemical analyses. This has been proven over and over again from the results of interlaboratory testing and quality control exercises. Large variations in results were reported even from 'experienced' laboratories."

The UNEP/WHO global study of cadmium biological monitoring set a limit for CDB accuracy using the maximum allowable deviation method at Y = X + or - (0.1 X + 1) for a targeted concentration of 10 ug Cd/l (Friberg and Vahter 1983). The performance of participating laboratories over a concentration range of 1.5-12 ug/l was reported by Lind et al. (1987). Of the 3 QC runs conducted during 1982 and 1983, 1 or 2 of the 6 laboratories failed each run. For the years 1983 and 1985, between zero and 2 laboratories failed each of the consecutive QC runs.

In another study (Vahter and Friberg 1988), QC samples consisting of both external (unknown) and internal (stated) concentrations were distributed to laboratories participating in the epidemiology research. In this study, the maximum acceptable deviation between the regression analysis of reported results and reference values was set at Y = X + or - (0.05 X + 0.2) for a concentration range of 0.3-5.0 ug Cd/l. It is reported that only 2 of 5 laboratories had acceptable data after the first QC set, and only 1 of 5 laboratories had acceptable data after the second QC set. By the fourth QC set, however, all 5 laboratories were judged proficient.

The need for high quality CDB monitoring is apparent when the toxicological and biological characteristics of this metal are considered; an increase in CDB from 2 to 4 ug/l could cause a doubling of the cadmium accumulation in the kidney, a critical target tissue for selective cadmium accumulation (Nordberg and Nordberg 1988).

Historically, the CDC's internal QC program for CDB cadmium monitoring program has found achievable accuracy to be + or - 10% of the true value at CDB concentrations > or = 5.0 ug/l (Paschal 1990). Data on the performance of laboratories participating in this program currently are not available.

5.1.6 Observed CDB Concentrations

As stated in Section 4.3, CDB concentrations are representative of ongoing levels of exposure to cadmium. Among those who have been exposed chronically to cadmium for extended periods, however, CDB may contain a component attributable to the general cadmium body burden.

5.1.6.1 CDB concentrations among unexposed samples

Numerous studies have been conducted examining CDB concentrations in the general population, and in control groups used for comparison with cadmium-exposed workers. A number of reports have been published that present erroneously high values of CDB (Nordberg and Nordberg 1988). This problem was due to contamination of samples during sampling and analysis, and to errors in analysis. Early AAS methods were not sufficiently sensitive to accurately estimate CDB concentrations.

Table 4 presents results of recent studies reporting CDB levels for the general U.S. population not exposed occupationally to cadmium. Other surveys of tissue cadmium using U.S. samples and conducted as part of a cooperative effort among Japan, Sweden and the U.S., did not collect CDB data because standard analytical methodologies were unavailable, and because of analytic problems (Kjellstrom 1979; SWRI 1978).

TABLE 4.
BLOOD CADMIUM CONCENTRATIONS OF U.S. POPULATION NOT OCCUPATIONALLY EXPOSED TO CADMIUM(a)

Study No.	No. in study (n)	Sex	Age	Smoking habits (b)	Arithmetic mean (+/-S.D.) (c)	Absolute range or (95% CI) (d)	Geometric mean (+/- GSD) (c)	Lower 95th percentile of distribution (f)	Upper 95th percentile of distribution (f)	Reference
1	80	M	4 to 69	NS,S	1.13	0.35-3.3	0.91+/-1.63	0.4	2.4	Kowal et al. (1979).
	88	F	4 to 69	NS, S	1.03	0.21-3.3	0.98+/-1.71	0.4	2.0	
	115	M/F	4 to 69	NS,	0.95	0.21-3.3	0.85+/-1.59	0.4	1.8	
	31	M/F	4 to 69	S	1.54	0.4-3.3	1.37+/-1.65	0.6	3.2	
2	10	M	Adults.	(?)	2.0+/-2.1	(0.5-5.0)	-	(g)(0)	(g)(5.8)	Ellis et al. (1983)
3	24	M	Adults.	NS	-	-	0.6+/-1.87	0.2	1.8	Frieberg and Vahter (1983).
	20	M	Adults.	S	-	-	1.2+/-2.13	0.3	4.4	
	64	F	Adults.	NS	-	-	0.5+/-1.85	0.2	1.4	
	39	F	Adults.	S	-	-	0.8+/-2.22	0.2	3.1	
4	32	M	Adults.	S, NS		-	1.2+/-2.0	0.4	3.9	Thun et al. (1989).
5	35	M	Adults.	(?)	2.1+/-2.1	(0.5-7.3)	-	(g)(0)	(g)(5.6)	Mueller et al. (1989)

Footnote(a)	Concentrations reported in ug Cd/l blood unless otherwise stated.
Footnote(b)	NS - never smoked; S - current cigarette smoker.
Footnote(c)	S.D. - Arithmetic Standard Deviation.
Footnote(d)	C.I. - Confidence interval.
Footnote(e)	GSD - Geometric Standard Deviation.
Footnote(f)	Based on an assumed lognormal distribution.
Footnote(g)	Based on an assumed normal distribution.

Arithmetic and/or geometric means and standard deviations are provided in Table 4 for measurements among the populations defined in each study listed. The range of reported measurements and/or the 95% upper and lower confidence intervals for the means are presented when this information was reported in a study. For studies reporting either an arithmetic or geometric standard deviation along with a mean, the lower and upper 95th percentile for the distribution also were derived and reported in the table.

The data provided in table 4 from Kowal et al. (1979) are from studies conducted between 1974 and 1976 evaluating CDB levels for the general population in Chicago, and are considered to be representative of the U.S. population. These studies indicate that the average CDB concentration among those not occupationally exposed to cadmium is approximately 1 ug/l.

In several other studies presented in Table 4, measurements are reported separately for males and females, and for smokers and nonsmokers. The data in this table indicate that similar CDB levels are observed among males and females in the general population, but that smokers tend to exhibit higher CDB levels than nonsmokers. Based on the Kowal et al. (1979) study, smokers not occupationally exposed to cadmium exhibit an average CDB level of 1.4 ug/l.

In general, nonsmokers tend to exhibit levels ranging to 2 ug/l, while levels observed among smokers range to 5 ug/l. Based on the data presented in Table 4, 95% of those not occupationally exposed to cadmium exhibit CDB levels less than 5 ug/l.

5.1.6.2 CDB concentrations among exposed workers

Table 5 is a summary of results from studies reporting CDB levels among workers exposed to cadmium in the work place. As in Table 4, arithmetic and/or geometric means and standard deviations are provided if reported in the listed studies. The absolute range, or the 95% confidence interval around the mean, of the data in each study are provided when reported. In addition, the lower and upper 95th percentile of the distribution are presented for each study in which a mean and corresponding standard deviation were reported. Table 5 also provides estimates of the duration, and level, of exposure to cadmium in the work place if these data were reported in the listed studies. The data presented in Table 5 suggest that CDB levels are dose related. Sukuri et al. (1983) show that higher CDB levels are observed among workers experiencing higher work place exposure. This trend appears to be true of every the studies listed in the table.

CDB levels reported in table 5 are higher among those showing signs of cadmium-related kidney damage than those showing no such damage. Lauwerys et al. (1976) report CDB levels among workers with kidney lesions that generally are above the levels reported for workers without kidney lesions. Ellis et al. (1983) report a similar observation comparing workers with and without renal dysfunction, although they found more overlap between the 2 groups than Lauwerys et al.

TABLE 5.
BLOOD CADMIUM IN WORKERS EXPOSED TO CADMIUM IN THE WORKPLACE

Study No.	Work environment (worker population monitored)	No. in study	Employment in years (mean)	Mean concentration of cadmium in air (ug/m(3))	Concentrations of Cadmium in Blood(a)					Reference
					Arithmetic mean (+/- S.D.) (b)	Absolute range or (95% CI) (c)	Geometric mean (GSD) (d)	Lower 95th percentile of range (c)( )(f)	Upper 95th percentile of range (c)( )(f)	
1	Ni-Cd battery plant and Cd production plant:		3-40	< than = to 90	-	-	-	-	-	Lauwerys et al. 1976
	(Workers without kidney lesions)	96	-	-	21.4 +/- 1.9	-	-	(18)	(25)	
	(Workers with kidney lesions)	25	-	-	38.8 +/- 3.8	-	-	(32)	(45)	
2	Ni-Cd battery plant	-	-	-	-	-	-	-	-	Adamsson et al. (1979)
	(Smokers)	7	(5)	10.1	22.7	7.3 – 67.2	-	-	-	
	(Nonsmokers)	8	(9)	7.0	7.0	4.9 – 10.5	-	-	-	
3	Cadmium alloy plant:	-	-	-	-	-	-	-	-	Sukuri et al. 1982
	(High exposure group)	7	(10.6)	[1,000-5 yrs; 40-5 yrs]	20.8 +/- 7.1	-	-	(7.3)	(34)	
	(Low exposure group)	9	(7.3)	-	7.1 +/- 1.1	-	-	(5.1)	(9.1)	
4	Retrospective study of workers with renal problems:	19	15-41	-	-	-	-	-	-	Roels et al. 1982
	(Before removal)	-	(27.2)	-	39.9 +/- 3.7	11 – 179	-	(34)	(46)	
	(After removal)	-	(g)(4.2)	-	14.1 +/- 5.6	5.7 – 27.4	-	(4.4)	(24)	
5	Cadmium production plant:	-	-	-	-	-	-	-	-	Ellis et al. 1983
	(Workers without renal| dysfunction)	33	1-34	-	15 +/- 5.7	7 – 31	-	(5.4)	(25)	
	(Workers with renal dysfunction)	18	10-34	-	24 +/- 8.5	10 - 34	-	(9.3)	(39)	

TABLE 5.
BLOOD CADMIUM IN WORKERS EXPOSED TO CADMIUM IN THE WORKPLACE

Study No.	Work environment (worker population monitored)	No. in study	Employment in years (mean)	Mean concentration of cadmium in air (ug/m(3))	Concentrations of Cadmium in Blood(a)					Reference
					Arithmetic mean (+/- S.D.) (b)	Absolute range or (95% CI) (c)	Geometric mean (GSD) (d)	Lower 95th percentile of range (c)( )(f)	Upper 95th percentile of range (c)( )(f)	
6	Cd-Cu alloy plant	75	Up to 39	-	-	-	8.8 +/- 1.1	7.5	10	Mason et al. 1988
7	Cadmium recovery operation Current (19) and former (26) workers.	45	(19.0)	-	-	-	7.9 +/- 2.0	2.5	25	Thun et al. 1989
8	Cadmium recovery operation	40	-	-	10.2 +/- 5.3	2.2 – 18.8	-	(1.3)	(19)	Mueller et al. 1989

Footnote(a)	Concentrations reported in ug Cd/l blood unless otherwise stated.
Footnote(b)	S.D. - Standard Deviation.
Footnote(c)	C.I. - Confidence Interval.
Footnote(d)	GSD - Geometric Standard Deviation.
Footnote(e)	Based on assumed lognormal distribution.
Footnote(f)	Based on assumed normal distribution.
Footnote(g)	Years following removal.

The data in table 5 also indicate that CDB levels are higher among those experiencing current occupational exposure than those who have been removed from such exposure. Roels et al. (1982) indicate that CDB levels observed among workers experiencing ongoing exposure in the work place are almost entirely above levels observed among workers removed from such exposure. This finding suggests that CDB levels decrease once cadmium exposure has ceased.

A comparison of the data presented in tables 4 and 5 indicates that CDB levels observed among cadmium-exposed workers is significantly higher than levels observed among the unexposed groups. With the exception of 2 studies presented in table 5 (1 of which includes former workers in the sample group tested), the lower 95th percentile for CDB levels among exposed workers are greater than 5 ug/l, which is the value of the upper 95th percentile for CDB levels observed among those who are not occupationally exposed. Therefore, a CDB level of 5 ug/l represents a threshold above which significant work place exposure to cadmium may be occurring.

5.1.7 Conclusions and Recommendations for CDB

Based on the above evaluation, the following recommendations are made for a CDB proficiency program.

5.1.7.1 Recommended method

The method of Stoeppler and Brandt (1980) should be adopted for analyzing CDB. This method was selected over other methods for its straightforward sample-preparation procedures, and because limitations of the method were described adequately. It also is the method used by a plurality of laboratories currently participating in the CTQ proficiency program. In a recent CTQ interlaboratory comparison report (CTQ 1991), analysis of the methods used by laboratories to measure CDB indicates that 46% (11 of 24) of the participating laboratories used the Stoeppler and Brandt methodology (HNO(3) deproteinization of blood followed by analysis of the supernatant by GF-AAS). Other CDB methods employed by participating laboratories identified in the CTQ report include dilution of blood (29%), acid digestion (12%) and miscellaneous methods (12%).

Laboratories may adopt alternate methods, but it is the responsibility of the laboratory to demonstrate that the alternate methods meet the data quality objectives defined for the Stoeppler and Brandt method (see Section 5.1.7.2 below).

5.1.7.2 Data quality objectives

Based on the above evaluation, the following data quality objectives (DQOs) should facilitate interpretation of analytical results.

Limit of Detection. 0.5 ug/l should be achievable using the Stoeppler and Brandt method. Stoeppler and Brandt (1980) report a limit of detection equivalent to < or = 0.2 ug/l in whole blood using 25 ul aliquots of deproteinized, diluted blood samples.

Accuracy. Initially, some of the laboratories performing CDB measurements may be expected to satisfy criteria similar to the less severe criteria specified by the CTQ program, i.e., measurements within 2 ug/l or 15% (whichever is greater) of the target value. About 60% of the laboratories enrolled in the CTQ program could meet this criterion on the first proficiency test (Weber 1988).

Currently, approximately 12 laboratories in the CTQ program are achieving an accuracy for CDB analysis within the more severe constraints of + or - 1 ug/l or 15% (whichever is greater). Later, as laboratories gain experience, they should achieve the level of accuracy exhibited by these 12 laboratories. The experience in the CTQ program has shown that, even without incentives, laboratories benefit from the feedback of the program; after they have analyzed 40-50 control samples from the program, performance improves to the point where about 60% of the laboratories can meet the stricter criterion of + or - 1 ug/l or 15% (Weber 1988). Thus, this stricter target accuracy is a reasonable DQO.

Precision. Although Stoeppler and Brandt (1980) suggest that a coefficient of variation (CV) near 1.3% (for a 10 ug/l concentration) is achievable for within-run reproducibility, it is recognized that other factors affecting within- and between-run comparability will increase the achievable CV. Stoeppler and Brandt (1980) observed CVs that were as high as 30% for low concentrations (0.4 ug/l), and CVs of less than 5% for higher concentrations.

For internal QC samples (see Section 3.3.1), laboratories should attain an overall precision near 25%. For CDB samples with concentrations less than 2 ug/l, a target precision of 40% is reasonable, while precisions of 20% should be achievable for concentrations greater than 2 ug/l. Although these values are more strict than values observed in the CTQ interlaboratory program reported by Webber (1988), they are within the achievable limits reported by Stoeppler and Brandt (1980).

5.1.7.3 Quality assurance/quality control

Commercial laboratories providing measurement of CDB should adopt an internal QA/QC program that incorporates the following components: Strict adherence to the selected method, including all calibration requirements; regular incorporation of QC samples during actual runs; a protocol for corrective actions, and documentation of these actions; and, participation in an interlaboratory proficiency program.

Note that the nonmandatory QA/QC program presented in Attachment 1 is based on the Stoeppler and Brandt method for CDB analysis. Should an alternate method be adopted, the laboratory should develop a QA/QC program satisfying the provisions of Section 3.3.1.

5.2 Measuring Cadmium in Urine (CDU)

As in the case of CDB measurement, proper determination of CDU requires strict analytical discipline regarding collection and handling of samples. Because cadmium is both ubiquitous in the environment and employed widely in coloring agents for industrial products that may be used during sample collection, preparation and analysis, care should be exercised to ensure that samples are not contaminated during the sampling procedure.

Methods for CDU determination share many of the same features as those employed for the determination of CDB. Thus, changes and improvements to methods for measuring CDU over the past 40 years parallel those used to monitor CDB. The direction of development has largely been toward the simplification of sample preparation techniques made possible because of improvements in analytic techniques.

5.2.1 Units of CDU Measurement

Procedures adopted for reporting CDU concentrations are not uniform. In fact, the situation for reporting CDU is more complicated than for CDB, where concentrations are normalized against a unit volume of whole blood.

Concentrations of solutes in urine vary with several biological factors (including the time since last voiding and the volume of liquid consumed over the last few hours); as a result, solute concentrations should be normalized against another characteristic of urine that represents changes in solute concentrations. The 2 most common techniques are either to standardize solute concentrations against the concentration of creatinine, or to standardize solute concentrations against the specific gravity of the urine. Thus, CDU concentrations have been reported in the literature as "uncorrected" concentrations of cadmium per volume of urine (i.e., ug Cd/l urine), "corrected" concentrations of cadmium per volume of urine at a standard specific gravity (i.e., ug Cd/l urine at a specific gravity of 1.020), or "corrected" mass concentration per unit mass of creatinine (i.e., ug Cd/g creatinine). (CDU concentrations [whether uncorrected or corrected for specific gravity, or normalized to creatinine] occasionally are reported in nanomoles [i.e., nmoles] of cadmium per unit mass or volume. In this protocol, these values are converted to ug of cadmium per unit mass or volume using 89 nmoles of cadmium = 10 ug.)

While it is agreed generally that urine values of analytes should be normalized for reporting purposes, some debate exists over what correction method should be used. The medical community has long favored normalization based on creatinine concentration, a common urinary constituent. Creatinine is a normal product of tissue catabolism, is excreted at a uniform rate, and the total amount excreted per day is constant on a day-to-day basis (NIOSH 1984b). While this correction method is accepted widely in Europe, and within some occupational health circles, Kowals (1983) argues that the use of specific gravity (i.e., total solids per unit volume) is more straightforward and practical (than creatinine) in adjusting CDU values for populations that vary by age or gender.
Kowals (1983) found that urinary creatinine (CRTU) is lower in females than males, and also varies with age. Creatinine excretion is highest in younger males (20-30 years old), decreases at middle age (50-60 years), and may rise slightly in later years. Thus, cadmium concentrations may be underestimated for some workers with high CRTU levels.

Within a single void urine collection, urine concentration of any analyte will be affected by recent consumption of large volumes of liquids, and by heavy physical labor in hot environments. The absolute amount of analyte excreted may be identical, but concentrations will vary widely so that urine must be corrected for specific gravity (i.e., to normalize concentrations to the quantity of total solute) using a fixed value (e.g., 1.020 or 1.024). However, since heavy-metal exposure may increase urinary protein excretion, there is a tendency to underestimate cadmium concentrations in samples with high specific gravities when specific-gravity corrections are applied.

Despite some shortcomings, reporting solute concentrations as a function of creatinine concentration is accepted generally; OSHA therefore recommends that CDU levels be reported as the mass of cadmium per unit mass of creatinine (ug/g CTRU).

Reporting CDU as ug/g CRTU requires an additional analytical process beyond the analysis of cadmium: Samples must be analyzed independently for creatinine so that results may be reported as the ratio of cadmium to creatinine concentrations found in the urine sample. Consequently, the overall quality of the analysis depends on the combined performance by a laboratory on these 2 determinations. The analysis used for CDU determinations is addressed below in terms of ug Cd/l, with analysis of creatinine addressed separately. Techniques for assessing creatinine are discussed in Section 5.4.

Techniques for deriving cadmium as a ratio of CRTU, and the confidence limits for independent measurements of cadmium and CRTU, are provided in Section 3.3.3.

5.2.2 Analytical Techniques Used to Monitor CDU

Analytical techniques used for CDU determinations are similar to those employed for CDB determinations; these techniques are summarized in Table 3. As with CDB monitoring, the technique most suitable for CDU determinations is atomic absorption spectroscopy (AAS). AAS methods used for CDU determinations typically employ a graphite furnace, with background correction made using either the deuterium-lamp or Zeeman techniques; Section 5.1.1 provides a detailed description of AAS methods.

5.2.3 Methods Developed for CDU Determinations

Princi (1947), Smith et al. (1955), Smith and Kench (1957), and Tsuchiya (1967) used calorimetric procedures similar to those described in the CDB section above to estimate CDU concentrations. In these methods, urine (50 ml) is reduced to dryness by heating in a sand bath and digested (wet ashed) with mineral acids. Cadmium then is complexed with dithiazone, extracted with chloroform and quantified by spectrophotometry. These early studies typically report reagent blank values equivalent to 0.3 ug Cd/l, and CDU concentrations among nonexposed control groups at maximum levels of 10 ug Cd/l -- erroneously high values when compared to more recent surveys of cadmium concentrations in the general population.

By the mid-1970s, most analytical procedures for CDU analysis used either wet ashing (mineral acid) or high temperatures (>400 deg. C) to digest the organic matrix of urine, followed by cadmium chelation with APDC or DDTC solutions and extraction with MIBK. The resulting aliquots were analyzed by flame or graphite-furnace AAS (Kjellstrom 1979).

Improvements in control over temperature parameters with electrothermal heating devices used in conjunction with flameless AAS techniques, and optimization of temperature programs for controlling the drying, charring, and atomization processes in sample analyses, led to improved analytical detection of diluted urine samples without the need for sample digestion or ashing. Roels et al. (1978) successfully used a simple sample preparation, dilution of 1.0 ml aliquots of urine with 0.1 N HNO(3), to achieve accurate low-level determinations of CDU.

In the method described by Pruszkowska et al. (1983), which has become the preferred method for CDU analysis, urine samples were diluted at a ratio of 1:5 with water; diammonium hydrogenphosphate in dilute HNO(3) was used as a matrix modifier. The matrix modifier allows for a higher charring temperature without loss of cadmium through volatilization during preatomization. This procedure also employs a stabilized temperature platform in a graphite furnace, while nonspecific background absorption is corrected using the Zeeman technique. This method allows for an absolute detection limit of approximately 0.04 ug Cd/l urine.

5.2.4 Sample Collection and Handling

Sample collection procedures for CDU may contribute to variability observed among CDU measurements. Sources of variation attendant to sampling include time-of-day, the interval since ingestion of liquids, and the introduction of external contamination during the collection process. Therefore, to minimize contributions from these variables, strict adherence to a sample-collection protocol is recommended. This protocol should include provisions for normalizing the conditions under which urine is collected. Every effort also should be made to collect samples during the same time of day.

Collection of urine samples from an industrial work force for biological monitoring purposes usually is performed using "spot" (i.e., single-void) urine with the pH of the sample determined immediately. Logistic and sample-integrity problems arise when efforts are made to collect urine over long periods (e.g., 24 hrs). Unless single-void urines are used, there are numerous opportunities for measurement error because of poor control over sample collection, storage and environmental contamination.

To minimize the interval during which sample urine resides in the bladder, the following adaption to the "spot" collection procedure is recommended: The bladder should first be emptied, and then a large glass of water should be consumed; the sample may be collected within an hour after the water is consumed.

5.2.5 Best Achievable Performance

Performance using a particular method for CDU determinations is assumed to be equivalent to the performance reported by the research laboratories in which the method was developed. Pruszkowska et al. (1983) report a detection limit of 0.04 ug/l CDU, with a CV of < 4% between 0-5 ug/l. The CDC reports a minimum CDU detection limit of 0.07 ug/l using a modified method based on Pruszkowska et al. (1983). No CV is stated in this protocol; the protocol contains only rejection criteria for internal QC parameters used during accuracy determinations with known standards (Attachment 8 of exhibit 106 of OSHA docket H057A). Stoeppler and Brandt (1980) report a CDU detection limit of 0.2 ug/l for their methodology.

5.2.6 General Method Performance

For any particular method, the expected initial performance from commercial laboratories may be somewhat lower than that reported by the research laboratory in which the method was developed. With participation in appropriate proficiency programs, and use of a proper in-house QA/QC program incorporating provisions for regular corrective actions, the performance of commercial laboratories may be expected to improve and approach that reported by a research laboratories.

The results reported for existing proficiency programs serve to specify the initial level of performance that likely can be expected from commercial laboratories offering analysis using a particular method.

Weber (1988) reports on the results of the CTQ proficiency program, which includes CDU results for laboratories participating in the program. Results indicate that after receiving 60 samples (i.e., after participating in the program for approximately 3 years), approximately 80% of the participating laboratories report CDU results ranging between + or - 2 ug/l or 15% of the consensus mean, whichever is greater. On any single sample of the last 15 samples, the proportion of laboratories falling within the specified range is between 75 and 95%, except for a single test for which only 60% of the laboratories reported acceptable results.

For each of the last 15 samples, approximately 60% of the laboratories reported results within + or - 1 ug or 15% of the mean, whichever is greater. The range of concentrations included in this set of samples was not reported.

Another report from the CTQ (1991) summarizes preliminary CDU results from their 1991 interlaboratory program. According to the report, for 3 CDU samples with values of 9.0, 16.8, 31.5 ug/l, acceptable results (target of + or - 2 ug/l or 15% of the consensus mean, whichever is greater) were achieved by only 44-52% of the 34 laboratories participating in the CDU program. The overall CVs for these 3 CDU samples among the 34 participating laboratories were 31%, 25%, and 49%, respectively. The reason for this poor performance has not been determined.

A more recent report from the CTQ (Weber, private communication) indicates that 36% of the laboratories in the program have been able to achieve the target of + or - 1 ug/l or 15% for more than 75% of the samples analyzed over the last 5 years, while 45% of participating laboratories achieved a target of + or - 2 ug/l or 15% for more than 75% of the samples analyzed over the same period.

Note that results reported in the interlaboratory programs are in terms of ug Cd/l of urine, unadjusted for creatinine. The performance indicated, therefore, is a measure of the performance of the cadmium portion of the analyses, and does not include variation that may be introduced during the analysis of CRTU.

5.2.7 Observed CDU Concentrations

Prior to the onset of renal dysfunction, CDU concentrations provide a general indication of the exposure history (i.e., body burden)(see Section 4.3). Once renal dysfunction occurs, CDU levels appear to increase and are no longer indicative solely of cadmium body burden (Friberg and Elinder 1988).

5.2.7.1 Range of CDU Concentrations Observed Among Unexposed Samples

Surveys of CDU concentrations in the general population were first reported from cooperative studies among industrial countries (i.e., Japan, U.S. and Sweden) conducted in the mid-1970s. In summarizing these data, Kjellstrom (1979) reported that CDU concentrations among Dallas, Texas men (age range: < 9-59 years; smokers and nonsmokers) varied from 0.11-1.12 ug/l (uncorrected for creatinine or specific gravity). These CDU concentrations are intermediate between population values found in Sweden (range: 0.11-0.80 ug/l) and Japan (range: 0.14-2.32 ug/l).

Kowal and Zirkes (1983) reported CDU concentrations for almost 1,000 samples collected during 1978-79 from the general U.S. adult population (i.e., nine states; both genders; ages 20-74 years). They report that CDU concentrations are lognormally distributed; low levels predominated, but a small proportion of the population exhibited high levels. These investigators transformed the CDU concentrations values, and reported the same data 3 different ways: ug/l urine (unadjusted), ug/l (specific gravity adjusted to 1.020), and ug/g CRTU. These data are summarized in Tables 6 and 7.

Based on further statistical examination of these data, including the lifestyle characteristics of this group, Kowal (1988) suggested increased cadmium absorption (i.e., body burden) was correlated with low dietary intakes of calcium and iron, as well as cigarette smoking.

CDU levels presented in Table 6 are adjusted for age and gender. Results suggest that CDU levels may be slightly different among men and women (i.e., higher among men when values are unadjusted, but lower among men when the values are adjusted, for specific gravity or CRTU). Mean differences among men and women are small compared to the standard deviations, and therefore may not be significant. Levels of CDU also appear to increase with age. The data in Table 6 suggest as well that reporting CDU levels adjusted for specific gravity or as a function of CRTU results in reduced variability.

TABLE 6
URINE CADMIUM CONCENTRATIONS IN THE U.S. ADULT POPULATION: NORMAL AND CONCENTRATION-ADJUSTED VALUES BY AGE AND SEX(1)

		Geometric means (and geometric standard deviations)		
		Unadjusted (ug/l)	**SG-adjusted(2) (ug/l at 1.020)**	**Creatine- adjusted (ug/g)**
SEX:				
	Male (n=484)	0.55 (2.9)	0.73 (2.6)	0.55 (2.7)
	Female (n=498)	0.49 (3.0)	0.86 (2.7)	0.78 (2.7)
AGE:				
	20-29 (n=222)	0.32 (3.0)	0.43 (2.7)	0.32 (2.7)
	30-39 (n=141)	0.46 (3.2)	0.70 (2.8)	0.54 (2.7)
	40-49 (n=142)	0.50 (3.0)	0.81 (2.6)	0.70 (2.7)
	50-59 (n=117)	0.61 (2.9)	0.99 (2.4)	0.90 (2.3)
	60-69 (n=272)	0.76 (2.6)	1.16 (2.3)	1.03 (2.3)
Footnote(1)	From Kowal and Zirkes, 1983.			
Footnote(2)	SC-adjusted is adjusted for specific gravity.			

TABLE 7
URINE CADMIUM CONCENTRATIONS IN THE U.S. ADULT POPULATION: CUMULATIVE FREQUENCY DISTRIBUTION OF URINARY CADMIUM (N=982)(1)

Range of Concentrations	Unadjusted (ug/l) percent	SG-adjusted (ug/l at 1.020) percent	Creatine-adjusted (ug/g) percent
<0.5	43.9	28.0	35.8
0.6 - 1.0	71.7	56.4	65.6
1.1 - 1.5	84.4	74.9	81.4
1.6 - 2.0	91.3	84.7	88.9
2.1 - 3.0	97.3	94.4	95.8
3.1 - 4.0	98.8	97.4	97.2
4.1 - 5.0	99.4	98.2	97.9
5.1 - 10.0	99.6	99.4	99.3
10.0 - 20.0	99.8	99.6	99.6
Footnote(1)	Source: Kowal and Zirkes (1983)		

The data in the Table 6 indicate the geometric mean of CDU levels observed among the general population is 0.52 ug Cd/l urine (unadjusted), with a geometric standard deviation of 3.0. Normalized for creatinine, the geometric mean for the population is 0.66 ug/g CRTU, with a geometric standard deviation of 2.7. Table 7 provides the distributions of CDU concentrations for the general population studied by Kowal and Zirkes. The data in this table indicate that 95% of the CDU levels observed among those not occupationally exposed to cadmium are below 3 ug/g CRTU.

5.2.7.2 Range of CDU concentrations observed among exposed workers

Table 8 is a summary of results from available studies of CDU concentrations observed among cadmium-exposed workers. In this table, arithmetic and/or geometric means and standard deviations are provided if reported in these studies. The absolute range for the data in each study, or the 95% confidence interval around the mean of each study, also are provided when reported. The lower and upper 95th percentile of the distribution are presented for each study in which a mean and corresponding standard deviation were reported. Table 8 also provides estimates of the years of exposure, and the levels of exposure, to cadmium in the work place if reported in these studies. Concentrations reported in this table are in ug/g CRTU, unless otherwise stated.

TABLE 8.
URINE CADMIUM CONCENTRATIONS IN WORKERS EXPOSED TO CADMIUM IN THE WORKPLACE

Study No.	Work environment (worker population monitored)	No. in study (n)	Employment in years (mean)	Mean concentration of cadmium in air (ug/m(3))	Concentrations of Cadmium in Urine(a)					Reference
					Arithmetic mean (+/- S.D.) (b)	Absolute range or (95% C.I.) (c)	Geometric mean (GSD) (d)	Lower 95th percentile of range (c)( )(f)	Upper 95th percentile of range (c)( )(f)	
1	Ni-Cd battery plant and Cd production plant:	-	3-40	< than = to 90	-	-	-	-	-	Lauwerys et al. 1976
	(Workers without kidney lesions)	96	-	-	16.3 +/-16.7	-	-	(0)	(44)	
	(Workers with kidney lesions)	25	-	-	48.2 +/- 42.6	-	-	(0)	(120)	
2	Ni-Cd battery plant	-	-	-	-	-	-	-	-	Adamsson et al. (1979)
	(Smokers)	7	(5)	10.1	5.5	1.0 – 14.7	-	-	-	
	(Nonsmokers)	8	(9)	7.0	3.6	0.5 – 9.3	-	-	-	
3	Cadmium salts production facility	148	(15.4)	-	-15.8	2 - 150	-	-	-	Butchet et al. 1980
4	Retrospective study of workers with renal problems:	19	15-41	-	-	-	-	-	-	Roels et al. 1982
	(Before removal)	-	(27.2)	-	39.4 +/- 28.1	10.8 – 117	-	(0)	(88)	
	(After removal)	-	(4.2)(g)	-	16.4 +/- 9.0	80 – 42.3	-	(1.0)	(32)	
5	Cadmium production plant:	-	-	-	-	-	-	-	-	Ellis et al. 1983
	(Workers without renal| dysfunction)	33	1-34	-	9.7 +/- 6.9	2 – 27	-	(0)	(21)	
	(Workers with renal dysfunction)	18	10-34	-	22.8 +/- 12.7	8 - 55	-	(1.0)	(45)	
6	Cd-Cu alloy plant	75	Up to 39	Note h	6.9 +/- 9.4	-	-	(0)	(23)	Mason et al. 1988
7	Cadmium recovery operation	45	(19)	87	9.3 +/- 6.9	-	-	(0)	(21)	Thun et al. 1989

TABLE 8.
URINE CADMIUM CONCENTRATIONS IN WORKERS EXPOSED TO CADMIUM IN THE WORKPLACE

Study No.	Work environment (worker population monitored)	No. in study (n)	Employment in years (mean)	Mean concentration of cadmium in air (ug/m(3))	Concentrations of Cadmium in Urine(a)					Reference
					Arithmetic mean (+/- S.D.) (b)	Absolute range or (95% C.I.) (c)	Geometric mean (GSD) (d)	Lower 95th percentile of range (c)( )(f)	Upper 95th percentile of range (c)( )(f)	
8	Pigment manufacturing plant	29	(12.8)	0.18-3.0	-	0.2 – 9.5	1.1	-	-	Mueller et al. 1989
9	Pigment manufacturing plant	26	(12.1)	< than = to 3.0	-	-	1.25 +/- 2.45	0.3	6	Kavada et al. 1990

Footnote(a)	Concentrations reported in ug/g Cr.
Footnote(b)	S.D. - Standard Deviation.
Footnote(c)	C.I. - Confidence Interval.
Footnote(d)	GSD - Geometric Standard Deviation.
Footnote(e)	Based on assumed lognormal distribution.
Footnote(f)	Based on assumed normal distribution.
Footnote(g)	Years following removal.
Footnote(h)	Equivalent to 50 for 20-22 yrs.

Data in Table 8 from Lauwerys et al. (1976) and Ellis et al. (1983) indicate that CDU concentrations are higher among those exhibiting kidney lesions or dysfunction than among those lacking these symptoms. Data from the study by Roels et al. (1982) indicate that CDU levels decrease among workers removed from occupational exposure to cadmium in comparison to workers experiencing ongoing exposure. In both cases, however, the distinction between the 2 groups is not as clear as with CDB; there is more overlap in CDU levels observed among each of the paired populations than is true for corresponding CDB levels. As with CDB levels, the data in Table 8 suggest increased CDU concentrations among workers who experienced increased overall exposure.

Although a few occupationally-exposed workers in the studies presented in Table 8 exhibit CDU levels below 3 ug/g CRTU, most of those workers exposed to cadmium levels in excess of the PEL defined in the final cadmium rule exhibit CDU levels above 3 ug/g CRTU; this level represents the upper 95th percentile of the CDU distribution observed among those who are not occupationally exposed to cadmium (Table 7).

The mean CDU levels reported in Table 8 among occupationally-exposed groups studied (except 2) exceed 3 ug/g CRTU. Correspondingly, the level of exposure reported in these studies (with 1 exception) are significantly higher than what workers will experience under the final cadmium rule. The 2 exceptions are from the studies by Mueller et al. (1989) and Kawada et al. (1990); these studies indicate that workers exposed to cadmium during pigment manufacture do not exhibit CDU levels as high as those levels observed among workers exposed to cadmium in other occupations. Exposure levels, however, were lower in the pigment manufacturing plants studied. Significantly, workers removed from occupational cadmium exposure for an average of 4 years still exhibited CDU levels in excess of 3 ug/g CRTU (Roels et al. 1982). In the single-exception study with a reported level of cadmium exposure lower than levels proposed in the final rule (i.e., the study of a pigment manufacturing plant by Kawada et al. 1990), most of the workers exhibited CDU levels less than 3 ug/g CRTU (i.e., the mean value was only 1.3 ug/g CRTU). CDU levels among workers with such limited cadmium exposure are expected to be significantly lower than levels of other studies reported in Table 8.

Based on the above data, a CDU level of 3 ug/g CRTU appears to represent a threshold above which significant work place exposure to cadmium occurs over the work span of those being monitored. Note that this threshold is not as distinct as the corresponding threshold described for CDB. In general, the variability associated with CDU measurements among exposed workers appears to be higher than the variability associated with CDB measurements among similar workers.

5.2.8 Conclusions and Recommendations for CDU

The above evaluation supports the following recommendations for a CDU proficiency program. These recommendations address only sampling and analysis procedures for CDU determinations specifically, which are to be reported as an unadjusted ug Cd/l urine. Normalizing this result to creatinine requires a second analysis for CRTU so that the ratio of the 2 measurements can be obtained. Creatinine analysis is addressed in Section 5.4. Formal procedures for combining the 2 measurements to derive a value and a confidence limit for CDU in ug/g CRTU are provided in Section 3.3.3.

5.2.8.1 Recommended Method

The method of Pruszkowska et al. (1983) should be adopted for CDU analysis. This method is recommended because it is simple, straightforward and reliable (i.e., small variations in experimental conditions do not affect the analytical results).

A synopsis of the methods used by laboratories to determine CDU under the interlaboratory program administered by the CTQ (1991) indicates that more than 78% (24 of 31) of the participating laboratories use a dilution method to prepare urine samples for CDU analysis. Laboratories may adopt alternate methods, but it is the responsibility of the laboratory to demonstrate that the alternate methods provide results of comparable quality to the Pruszkowska method.

5.2.8.2 Data Quality Objectives

The following data quality objectives should facilitate interpretation of analytical results, and are achievable based on the above evaluation.

Limit of Detection. A level of 0.5 ug/l (i.e., corresponding to a detection limit of 0.5 ug/g CRTU, assuming 1 g CRT/l urine) should be achievable. Pruszkowska et al. (1983) achieved a limit of detection of 0.04 ug/l for CDU based on the slope the curve for their working standards (0.35 pg Cd/0.0044, A signal=1% absorbance using GF-AAS).

The CDC reports a minimum detection limit for CDU of 0.07 ug/l using a modified Pruszkowska method. This limit of detection was defined as 3 times the standard deviation calculated from 10 repeated measurements of a "low level" CDU test sample (Attachment 8 of exhibit 106 of OSHA docket H057A).

Stoeppler and Brandt (1980) report a limit of detection for CDU of 0.2 ug/l using an aqueous dilution (1:2) of the urine samples.

Accuracy. A recent report from the CTQ (Weber, private communication) indicates that 36% of the laboratories in the program achieve the target of + or - 1 ug/l or 15% for more than 75% of the samples analyzed over the last 5 years, while 45% of participating laboratories achieve a target of + or - 2 ug/l or 15% for more than 75% of the samples analyzed over the same period. With time and a strong incentive for improvement, it is expected that the proportion of laboratories successfully achieving the stricter level of accuracy should increase. It should be noted, however, these indices of performance do not include variations resulting from the ancillary measurement of CRTU (which is recommended for the proper recording of results).

The low cadmium levels expected to be measured indicate that the analysis of creatinine will contribute relatively little to the overall variability observed among creatinine-normalized CDU levels (see Section 5.4). The initial target value for reporting CDU under this program, therefore, is set at + or - 1 ug/g CRTU or 15% (whichever is greater).

Precision. For internal QC samples (which are recommended as part of an internal QA/QC program, Section 3.3.1), laboratories should attain an overall precision of 25%. For CDB samples with concentrations less than 2 ug/l, a target precision of 40% is acceptable, while precisions of 20% should be achievable for CDU concentrations greater than 2 ug/l. Although these values are more stringent than those observed in the CTQ interlaboratory program reported by Webber (1988), they are well within limits expected to be achievable for the method as reported by Stoeppler and Brandt (1980).

5.2.8.3 Quality Assurance/Quality Control

Commercial laboratories providing CDU determinations should adopt an internal QA/QC program that incorporates the following components: Strict adherence to the selected method, including calibration requirements; regular incorporation of QC samples during actual runs; a protocol for corrective actions, and documentation of such actions; and, participation in an interlaboratory proficiency program. Note that the nonmandatory program presented in Attachment 1 as an example of an acceptable QA/QC program, is based on using the Pruszkowska method for CDU analysis. Should an alternate method be adopted by a laboratory, the laboratory should develop a QA/QC program equivalent to the nonmandatory program, and which satisfies the provisions of Section 3.3.1.

5.3 Monitoring B-2-Microglobulin in Urine (B(2)MU)

As indicated in Section 4.3, B(2)MU appears to be the best of several small proteins that may be monitored as early indicators of cadmium- induced renal damage. Several analytic techniques are available for measuring B2M.

5.3.1 Units of B(2)MU Measurement

Procedures adopted for reporting B(2)MU levels are not uniform. In these guidelines, OSHA recommends that B(2)MU levels be reported as ug/g CRTU, similar to reporting CDU concentrations. Reporting B(2)MU normalized to the concentration of CRTU requires an additional analytical process beyond the analysis of B2M: Independent analysis for creatinine so that results may be reported as a ratio of the B2M and creatinine concentrations found in the urine sample. Consequently, the overall quality of the analysis depends on the combined performance on these 2 analyses. The analysis used for B(2)MU determinations is described in terms of ug B2M/l urine, with analysis of creatinine addressed separately. Techniques used to measure creatinine are provided in Section 5.4. Note that Section 3.3.3 provides techniques for deriving the value of B2M as function of CRTU, and the confidence limits for independent measurements of B2M and CRTU.

5.3.2 Analytical Techniques Used to Monitor B(2)MU

One of the earliest tests used to measure B(2)MU was the radial immunodiffusion technique. This technique is a simple and specific method for identification and quantitation of a number of proteins found in human serum and other body fluids when the protein is not readily differentiated by standard electrophoretic procedures. A quantitative relationship exists between the concentration of a protein deposited in a well that is cut into a thin agarose layer containing the corresponding monospecific antiserum, and the distance that the resultant complex diffuses. The wells are filled with an unknown serum and the standard (or control), and incubated in a moist environment at room temperature. After the optimal point of diffusion has been reached, the diameters of the resulting precipition rings are measured. The diameter of a ring is related to the concentration of the constituent substance. For B(2)MU determinations required in the medical monitoring program, this method requires a process that may be insufficient to concentrate the protein to levels that are required for detection.

Radioimmunoassay (RIA) techniques are used widely in immunologic assays to measure the concentration of antigen or antibody in body-fluid samples. RIA procedures are based on competitive-binding techniques. If antigen concentration is being measured, the principle underlying the procedure is that radioactive-labeled antigen competes with the sample's unlabeled antigen for binding sites on a known amount of immobile antibody. When these 3 components are present in the system, an equilibrium exists. This equilibrium is followed by a separation of the free and bound forms of the antigen. Either free or bound radioactive-labeled antigen can be assessed to determine the amount of antigen in the sample. The analysis is performed by measuring the level of radiation emitted either by the bound complex following removal of the solution containing the free antigen, or by the isolated solution containing the residual-free antigen.

The main advantage of the RIA method is the extreme sensitivity of detection for emitted radiation and the corresponding ability to detect trace amounts of antigen. Additionally, large numbers of tests can be performed rapidly.

The enzyme-linked immunosorbent assay (ELISA) techniques are similar to RIA techniques except that nonradioactive labels are employed. This technique is safe, specific and rapid, and is nearly as sensitive as RIA techniques. An enzyme-labeled antigen is used in the immunologic assay; the labeled antigen detects the presence and quantity of unlabeled antigen in the sample. In a representative ELISA test, a plastic plate is coated with antibody (e.g., antibody to B2M). The antibody reacts with antigen (B2M) in the urine and forms an antigen-antibody complex on the plate. A second anti-B2M antibody (i.e., labeled with an enzyme) is added to the mixture and forms an antibody-antigen-antibody complex. Enzyme activity is measured spectrophotometrically after the addition of a specific chromogenic substrate which is activated by the bound enzyme. The results of a typical test are calculated by comparing the spectrophotometric reading of a serum sample to that of a control or reference serum. In general, these procedures are faster and require less laboratory work than other methods.

In a fluorescent ELISA technique (such as the one employed in the Pharmacia Delphia test for B2M), the labeled enzyme is bound to a strong fluorescent dye. In the Pharmacia Delphia test, an antigen bound to a fluorescent dye competes with unlabeled antigen in the sample for a predetermined amount of specific, immobile antibody. Once equilibrium is reached, the immobile phase is removed from the labeled antigen in the sample solution and washed; an enhancement solution then is added that liberates the fluorescent dye from the bound antigen-antibody complex. The enhancement solution also contains a chelate that complexes with the fluorescent dye in solution; this complex increases the fluorescent properties of the dye so that it is easier to detect.

To determine the quantity of B2M in a sample using the Pharmacia Delphia test, the intensity of the fluorescence of the enhancement solution is measured. This intensity is proportional to the concentration of labeled antigen that bound to the immobile antibody phase during the initial competition with unlabeled antigen from the sample. Consequently, the intensity of the fluorescence is an inverse function of the concentration of antigen (B2M) in the original sample. The relationship between the fluorescence level and the B2M concentration in the sample is determined using a series of graded standards, and extrapolating these standards to find the concentration of the unknown sample.

5.3.3 Methods Developed for B(2)MU Determinations

B(2)MU usually is measured by radioimmunoassay (RIA) or enzyme-linked immunosorbent assay (ELISA); however, other methods (including gel electrophoresis, radial immunodiffusion, and nephelometric assays) also have been described (Schardun and van Epps 1987). RIA and ELISA methods are preferred because they are sensitive at concentrations as low as micrograms per liter, require no concentration processes, are highly reliable and use only a small sample volume.

Based on a survey of the literature, the ELISA technique is recommended for monitoring B(2)MU. While RIAs provide greater sensitivity (typically about 1 ug/l, Evrin et al. 1971), they depend on the use of radioisotopes; use of radioisotopes requires adherence to rules and regulations established by the Atomic Energy Commission, and necessitates an expensive radioactivity counter for testing. Radioisotopes also have a relatively short half-life, which corresponds to a reduced shelf life, thereby increasing the cost and complexity of testing. In contrast, ELISA testing can be performed on routine laboratory spectrophotometers, do not necessitate adherence to additional rules and regulations governing the handling of radioactive substances, and the test kits have long shelf lives. Further, the range of sensitivity commonly achieved by the recommended ELISA test (i.e., the Pharmacia Delphia test) is approximately 100 ug/l (Pharmacia 1990), which is sufficient for monitoring B(2)MU levels resulting from cadmium exposure. Based on the studies listed in Table 9 (Section 5.3.7), the average range of B2M concentrations among the general, nonexposed population falls between 60 and 300 ug/g CRTU. The upper 95th percentile of distributions, derived from studies in Table 9 which reported standard deviations, range between 180 and 1,140 ug/g CRTU. Also, the Pharmacia Delphia test currently is the most widely used test for assessing B(2)MU.

5.3.4 Sample Collection and Handling

As with CDB or CDU, sample collection procedures are addressed primarily to identify ways to minimize the degree of variability introduced by sample collection during medical monitoring. It is unclear the extent to which sample collection contributes to B(2)MU variability. Sources of variation include time-of-day effects, the interval since consuming liquids and the quantity of liquids consumed, and the introduction of external contamination during the collection process. A special problem unique to B2M sampling is the sensitivity of this protein to degradation under acid conditions commonly found in the bladder. To minimize this problem, strict adherence to a sampling protocol is recommended. The protocol should include provisions for normalizing the conditions under which the urine is collected. Clearly, it is important to minimize the interval urine spends in the bladder. It also is recommended that every effort be made to collect samples during the same time of day.

Collection of urine samples for biological monitoring usually is performed using "spot" (i.e., single-void) urine. Logistics and sample integrity become problems when efforts are made to collect urine over extended periods (e.g., 24 hrs). Unless single-void urines are used, numerous opportunities exist for measurement error because of poor control over sample collection, storage and environmental contamination.

To minimize the interval that sample urine resides in the bladder, the following adaption to the "spot" collection procedure is recommended: The bladder should be emptied and then a large glass of water should be consumed; the sample then should be collected within an hour after the water is consumed.

5.3.5 Best Achievable Performance

The best achievable performance is assumed to be equivalent to the performance reported by the manufacturers of the Pharmacia Delphia test kits (Pharmacia 1990). According to the insert that comes with these kits, QC results should be within + or - 2 SDs of the mean for each control sample tested; a CV of less than or equal to 5.2% should be maintained. The total CV reported for test kits is less than or equal to 7.2%.

5.3.6 General Method Performance

Unlike analyses for CDB and CDU, the Pharmacia Delphia test is standardized in a commercial kit that controls for many sources of variation. In the absence of data to the contrary, it is assumed that the achievable performance reported by the manufacturer of this test kit will serve as an achievable performance objective. The CTQ proficiency testing program for B(2)MU analysis is expected to use the performance parameters defined by the test kit manufacturer as the basis of the B(2)MU proficiency testing program.

Note that results reported for the test kit are expressed in terms of ug B2M/l of urine, and have not been adjusted for creatinine. The indicated performance, therefore, is a measure of the performance of the B2M portion of the analyses only, and does not include variation that may have been introduced during the analysis of creatinine.

5.3.7 Observed B(2)MU Concentrations

As indicated in Section 4.3, the concentration of B(2)MU may serve as an early indicator of the onset of kidney damage associated with cadmium exposure.

5.3.7.1 Range of B(2)MU Concentrations Among Unexposed Samples

Most of the studies listed in Table 9 report B(2)MU levels for those who were not occupationally exposed to cadmium. Studies noted in the second column of this table (which contain the footnote "d") reported B(2)MU concentrations among cadmium-exposed workers who, nonetheless, showed no signs of proteinuria. These latter studies are included in this table because, as indicated in Section 4.3, monitoring B(2)MU is intended to provide advanced warning of the onset of kidney dysfunction associated with cadmium exposure, rather than to distinguish relative exposure. This table, therefore, indicates the range of B(2)MU levels observed among those who had no symptoms of renal dysfunction (including cadmium-exposed workers with none of these symptoms).

Table 9
B-2-Microglogulin Concentrations Observed in Urine Among Those not Occupationally Exposed to Cadmium

Study No.	No. in study	Geometric mean	Geometric standard deviation	Lower 95th percentile of distribution (a)	Upper 95th percentile of distribution (a)	Reference
1.	133 m(b)	115 ug/g(c)	4.02	12	1,140 ug/g(c)	Ishizaki et al 1989
2.	161 f(b)	146 ug/g(c)	3.11	23	940 ug/g(c)	Ishizaki et al 1989
3.	10	84 ug/g	-	-	-	Ellis et. al. 1983
4.	203	76 ug/1	-	-	-	Stewart and Hughes 1981
5.	0	103 ug/g	-	-	-	Chia et al. 1989
6	47(d)	86 ug/L	1.9	30 ug/1	250 ug/L	Kjellstron et al 1977
7	1,000(e)	68.1 ug/gr Cr(f)	3.1 m & f	< 10 u/gr Cr(h)	320 ug/gr Cr(h)	Kowal 1983
8	87	71 ug/g(i)	-	7(h)	200(h)	Buchet et al. 1980.
9	10	0.073 mg/24h	-	-	-	Evrin et al.1971
10	59	156 ug/g	1.1(j)	130	180	Mason et al. 1988
11	8	118 ug/g	-	-	-	Iwao et al.1980
12	34	79 ug/g	-	-	-	Wibowo et al. 1982
13	41 m	-	-	-	400 ug/gr Cr(k)	Falck et al. 1983
14	35(n)	67	-	-	-	Roels et al. 1991
15	31(d)	63	-	-	-	Roels et al. 1991
16	36(d)	77(i)	-	-	-	Miksche et al. 1981
17	18(n)	130	-	-	-	Kawada et al. 1989
18	32(p)	122	-	-	-	Kawada et al. 1989
19	18(d)	295	1.4	170	510	Thun et al. 1989

Footnote(a)	Based on an assumed lognormal distribution
Footnote(b)	m = males, f = females
Footnote(c)	Aged general population from non-polluted area; 47.9% population aged 50-69; 52.1% > than or = to 70 years of age; values reported in study
Footnote(d)	Exposed workers without proteinuria
Footnote(e)	492 females, 484 males
Footnote(f)	Creatinine-adjusted; males = 68.1 ug/g Cr, females = 64.3 ug/g Cr
Footnote(h)	Reported in the study
Footnote(i)	Arithmetic mean
Footnote(j)	Geometric standard error
Footnote(k)	Upper 95% tolerance limits: for Falck this is based on the 24 hour urine sample
Footnote(n)	Controls
Footnote(p)	Exposed synthetic resin and pigment workers without proteinuria; Cadmium in urine levels up to 10 ug/g Cr

To the extent possible, the studies listed in Table 9 provide geometric means and geometric standard deviations for measurements among the groups defined in each study. For studies reporting a geometric standard deviation along with a mean, the lower and upper 95th percentile for these distributions were derived and reported in the table.

The data provided from 15 of the 19 studies listed in Table 9 indicate that the geometric mean concentration of B2M observed among those who were not occupationally exposed to cadmium is 70-170 ug/g CRTU. Data from the 4 remaining studies indicate that exposed workers who exhibit no signs of proteinuria show mean B(2)MU levels of 60-300 ug/g CRTU. B(2)MU values in the study by Thun et al. (1989), however, appear high in comparison to the other 3 studies.

If this study is removed, B(2)MU levels for those who are not occupationally exposed to cadmium are similar to B(2)MU levels found among cadmium-exposed workers who exhibit no signs of kidney dysfunction. Although the mean is high in the study by Thun et al., the range of measurements reported in this study is within the ranges reported for the other studies.

Determining a reasonable upper limit from the range of B2M concentrations observed among those who do not exhibit signs of proteinuria is problematic. Elevated B(2)MU levels are among the signs used to define the onset of kidney dysfunction. Without access to the raw data from the studies listed in Table 9, it is necessary to rely on reported standard deviations to estimate an upper limit for normal B(2)MU concentrations (i.e., the upper 95th percentile for the distributions measured). For the 8 studies reporting a geometric standard deviation, the upper 95th percentiles for the distributions are 180-1140 ug/g CRTU. These values are in general agreement with the upper 95th percentile for the distribution (i.e., 631 ug/g CRTU) reported by Buchet et al. (1980). These upper limits also appear to be in general agreement with B(2)MU values (i.e., 100-690 ug/g CRTU) reported as the normal upper limit by Iwao et al. (1980), Kawada et al. (1989), Wibowo et al. (1982), and Schardun and van Epps (1987). These values must be compared to levels reported among those exhibiting kidney dysfunction to define a threshold level for kidney dysfunction related to cadmium exposure.

5.3.7.2 Range of B(2)MU Concentrations Among Exposed Workers

Table 10 presents results from studies reporting B(2)MU determinations among those occupationally exposed to cadmium in the work place; in some of these studies, kidney dysfunction was observed among exposed workers, while other studies did not make an effort to distinguish among exposed workers based on kidney dysfunction. As with Table 9, this table provides geometric means and geometric standard deviations for the groups defined in each study if available. For studies reporting a geometric standard deviation along with a mean, the lower and upper 95th percentiles for the distributions are derived and reported in the table.

Table 10.
B(2)-Microglobulin Concentrations Observed in Urine Among Occupationally-Exposed Workers

Study No.	N	Concentration of B(2)-microglobulin in urine				Reference
		Geometric mean. (ug/g)(a)	Geometric standard deviation	Lower 95th percentile of range (b)	Upper 95th percentile of range (b)	
1.	1,424	160	6.19	8.1	3,300	Ishizaki et al 1989
2.	1,765	260	6.5	12	5,600	Ishizaki et al 1989
3.	33	210	-	-	-	Ellis et. al. 1983
4.	65	210	-	-	-	Chia et al. 1989
5.	(c)44	5,700	6.49	(d)300	(d)98.000	Kjellstron et al 1977
6	148	(e)180	-	(f)110	(f)280	Buchet et al. 1980.
7	37	160	3.90	17	1,500	Kenzaburo et al. 1979
8	(c)56	3,300	8.70	(d)310	(d)89,000	Mason et al. 1988
9	(c)10	6,100	5.99	(f)650	(f)57,000	Falck et al. 1983
10	(c)11	3,900	2.96	(d)710	(d)15,000	Elinderet al. 1985
11	(c)12	300	-	-	-	Roels et al. 1991
12	(g)8	7,400	-	-	-	Roels et al. 1991
13	(c)23	(h)1,800	-	-	-	Roels et al. 1989
14	10	690	-	-	-	Iwao et al. 1980
15	34	71	-	-	-	Wibowo et al. 1982
16	(c)15	4,700	6.49	(d)590	(d)93,000	Thun et al. 1989

Footnote(a)	Unless otherwise stated.
Footnote(b)	Based on an assumed lognormal distribution.
Footnote(c)	Among workers diagnosed as having renal dysfunction; for Elinder this means B(2) levels greater than 300 micrograms per gram creatinine (ug/gr Cr); for Roels, 1991, range = 31-35, 170 ugB(2)/gr Cr and geometric mean = 63 among healthy workers; for Mason B(2)>300 ug/gr Cr.
Footnote(d)	Based on a detailed review of the data by OSHA.
Footnote(e)	Arithmetic mean.
Footnote(f)	Reported in the study.
Footnote(g)	Retired workers.
Footnote(h)	1,800 ugB(2)/gr Cr for first survey; second survey = 1,600; third survey = 2,600; fourth survey = 2,600; fifth survey = 2,600.

The data provided in Table 10 indicate that the mean B(2)MU concentration observed among workers experiencing occupational exposure to cadmium (but with undefined levels of proteinuria) is 160-7400 ug/g CRTU. One of these studies reports geometric means lower than this range (i.e., as low as 71 ug/g CRTU); an explanation for this wide spread in average concentrations is not available.

Seven of the studies listed in Table 10 report a range of B(2)MU levels among those diagnosed as having renal dysfunction. As indicated in this table, renal dysfunction (proteinuria) is defined in several of these studies by B(2)MU levels in excess of 300 ug/g CRTU (see footnote "c" of Table 10); therefore, the range of B(2)MU levels observed in these studies is a function of the operational definition used to identify those with renal dysfunction. Nevertheless, a B(2)MU level of 300 ug/g CRTU appears to be a meaningful threshold for identifying those having early signs of kidney damage. While levels much higher than 300 ug/g CRTU have been observed among those with renal dysfunction, the vast majority of those not occupationally exposed to cadmium exhibit much lower B(2)MU concentrations (see Table 9). Similarly, the vast majority of workers not exhibiting renal dysfunction are found to have levels below 300 ug/g CRTU (Table 9).

The 300 ug/g CRTU level for B(2)MU proposed in the above paragraph has support among researchers as the threshold level that distinguishes between cadmium-exposed workers with and without kidney dysfunction. For example, in the guide for physicians who must evaluate cadmium-exposed workers written for the Cadmium Council by Dr. Lauwerys, levels of B2M greater than 200-300 ug/g CRTU are considered to require additional medical evaluation for kidney dysfunction (exhibit 8-447, OSHA docket H057A). The most widely used test for measuring B2M (i.e., the Pharmacia Delphia test) defines B(2)MU levels above 300 ug/l as abnormal (exhibit L-140-1, OSHA docket H057A).

Dr. Elinder, chairman of the Department of Nephrology at the Karolinska Institute, testified at the hearings on the proposed cadmium rule. According to Dr. Elinder (exhibit L-140-45, OSHA docket H057A), the normal concentration of B(2)MU has been well documented (Evrin and Wibell 1972; Kjellstrom et al. 1977a; Elinder et al. 1978, 1983; Buchet et al. 1980; Jawaid et al. 1983; Kowal and Zirkes, 1983). Elinder stated that the upper 95 or 97.5 percentiles for B(2)MU among those without tubular dysfunction is below 300 ug/g CRTU (Kjellstrom et al. 1977a; Buchet et al. 1980; Kowal and Zirkes, 1983). Elinder defined levels of B2M above 300 ug/g CRTU as "slight" proteinuria.

5.3.8 Conclusions and Recommendations for B(2)MU

Based on the above evaluation, the following recommendations are made for a B(2)MU proficiency testing program. Note that the following discussion addresses only sampling and analysis for B(2)MU determinations (i.e., to be reported as an unadjusted ug B(2)M/l urine). Normalizing this result to creatinine requires a second analysis for CRTU (see Section 5.4) so that the ratio of the 2 measurements can be obtained.

5.3.8.1 Recommended Method

The Pharmacia Delphia method (Pharmacia 1990) should be adopted as the standard method for B(2)MU determinations. Laboratories may adopt alternate methods, but it is the responsibility of the laboratory to demonstrate that alternate methods provide results of comparable quality to the Pharmacia Delphia method.

5.3.8.2 Data Quality Objectives

The following data quality objectives should facilitate interpretation of analytical results, and should be achievable based on the above evaluation.

Limit of Detection. A limit of 100 ug/l urine should be achievable, although the insert to the test kit (Pharmacia 1990) cites a detection limit of 150 ug/l; private conversations with representatives of Pharmacia, however, indicate that the lower limit of 100 ug/l should be achievable provided an additional standard of 100 ug/l B2M is run with the other standards to derive the calibration curve (Section 3.3.1.1). The lower detection limit is desirable due to the proximity of this detection limit to B(2)MU values defined for the cadmium medical monitoring program.

Accuracy. Because results from an interlaboratory proficiency testing program are not available currently, it is difficult to define an achievable level of accuracy. Given the general performance parameters defined by the insert to the test kits, however, an accuracy of + or - 15% of the target value appears achievable.

Due to the low levels of B(2)MU to be measured generally, it is anticipated that the analysis of creatinine will contribute relatively little to the overall variability observed among creatinine-normalized B(2)MU levels (see Section 5.4). The initial level of accuracy for reporting B(2)MU levels under this program should be set at + or - 15%.

Precision. Based on precision data reported by Pharmacia (1990), a precision value (i.e., CV) of 5% should be achievable over the defined range of the analyte. For internal QC samples (i.e., recommended as part of an internal QA/QC program, Section 3.3.1), laboratories should attain precision near 5% over the range of concentrations measured.

5.3.8.3 Quality Assurance/Quality Control

Commercial laboratories providing measurement of B(2)MU should adopt an internal QA/QC program that incorporates the following components: Strict adherence to the Pharmacia Delphia method, including calibration requirements; regular use of QC samples during routine runs; a protocol for corrective actions, and documentation of these actions; and, participation in an interlaboratory proficiency program.

Procedures that may be used to address internal QC requirements are presented in Attachment 1. Due to differences between analyses for B(2)MU and CDB/CDU, specific values presented in Attachment 1 may have to be modified. Other components of the program (including characterization runs), however, can be adapted to a program for B(2)MU.

5.4 Monitoring Creatinine in Urine (CRTU)

Because CDU and B(2)MU should be reported relative to concentrations of CRTU, these concentrations should be determined in addition CDU and B(2)MU determinations.

5.4.1 Units of CRTU Measurement

CDU should be reported as ug Cd/g CRTU, while B(2)MU should be reported as ug B2M/g CRTU. To derive the ratio of cadmium or B2M to creatinine, CRTU should be reported in units of g crtn/l of urine. Depending on the analytical method, it may be necessary to convert results of creatinine determinations accordingly.

5.4.2 Analytical Techniques Used to Monitor CRTU

Of the techniques available for CRTU determinations, an absorbance spectrophotometric technique and a high-performance liquid chromatography (HPLC) technique are identified as acceptable in this protocol.

5.4.3 Methods Developed for CRTU Determinations

CRTU analysis performed in support of either CDU or B(2)MU determinations should be performed using either of the following 2 methods:

1. The Du Pont method (i.e., Jaffe method), in which creatinine in a sample reacts with picrate under alkaline conditions, and the resulting red chromophore is monitored (at 510 nm) for a fixed interval to determine the rate of the reaction; this reaction rate is proportional to the concentration of creatinine present in the sample (a copy of this method is provided in Attachment 2 of this protocol); or,
2. The OSHA SLC Technical Center (OSLTC) method, in which creatinine in an aliquot of sample is separated using an HPLC column equipped with a UV detector; the resulting peak is quantified using an electrical integrator (a copy of this method is provided in Attachment 3 of this protocol).

5.4.4 Sample Collection and Handling

CRTU samples should be segregated from samples collected for CDU or B(2)MU analysis. Sample-collection techniques have been described under Section 5.2.4. Samples should be preserved either to stabilize CDU (with HNO(3)) or B(2)MU (with NaOH). Neither of these procedures should adversely affect CRTU analysis (see Attachment 3).

5.4.5 General Method Performance

Data from the OSLTC indicate that a CV of 5% should be achievable using the OSLTC method (Septon, L private communication). The achievable accuracy of this method has not been determined.

Results reported in surveys conducted by the CAP (CAP 1991a, 1991b and 1992) indicate that a CV of 5% is achievable. The accuracy achievable for CRTU determinations has not been reported.

Laboratories performing creatinine analysis under this protocol should be CAP accredited and should be active participants in the CAP surveys.

5.4.6 Observed CRTU Concentrations

Published data suggest the range of CRTU concentrations is 1.0-1.6 g in 24-hour urine samples (Harrison 1987). These values are equivalent to about 1 g/l urine.

5.4.7 Conclusions and Recommendations for CRTU

5.4.7.1 Recommended Method

Use either the Jaffe method (Attachment 2) or the OSLTC method (Attachment 3). Alternate methods may be acceptable provided adequate performance is demonstrated in the CAP program.

5.4.7.2 Data Quality Objectives

Limit of Detection. This value has not been formally defined; however, a value of 0.1 g/l urine should be readily achievable.

Accuracy. This value has not been defined formally; accuracy should be sufficient to retain accreditation from the CAP.

Precision. A CV of 5% should be achievable using the recommended methods.

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ATTACHMENT 1
NONMANDATORY PROTOCOL FOR AN INTERNAL QUALITY ASSURANCE/QUALITY CONTROL PROGRAM

The following is an example of the type of internal quality assurance/quality control program that assures adequate control to satisfy OSHA requirements under this protocol. However, other approaches may also be acceptable.

As indicated in Section 3.3.1 of the protocol, the QA/QC program for CDB and CDU should address, at a minimum, the following:

- calibration;
- establishment of control limits;
- internal QC analyses and maintaining control; and
- corrective action protocols.

This illustrative program includes both initial characterization runs to establish the performance of the method and ongoing analysis of quality control samples intermixed with compliance samples to maintain control.

Calibration

Before any analytical runs are conducted, the analytic instrument must be calibrated. This is to be done at the beginning of each day on which quality control samples and/or compliance samples are run. Once calibration is established, quality control samples or compliance samples may be run. Regardless of the type of samples run, every fifth sample must be a standard to assure that the calibration is holding.

Calibration is defined as holding if every standard is within plus or minus (+ or -) 15% of its theoretical value. If a standard is more than plus or minus 15% of its theoretical value, then the run is out of control due to calibration error and the entire set of samples must either be reanalyzed after recalibrating or results should be recalculated based on a statistical curve derived from the measurement of all standards.

It is essential that the highest standard run is higher than the highest sample run. To assure that this is the case, it may be necessary to run a high standard at the end of the run, which is selected based on the results obtained over the course of the run.

All standards should be kept fresh, and as they get old, they should be compared with new standards and replaced if they exceed the new standards by + or - 15%.

Initial Characterization Runs and Establishing Control

A participating laboratory should establish four pools of quality control samples for each of the analytes for which determinations will be made. The concentrations of quality control samples within each pool are to be centered around each of the four target levels for the particular analyte identified in Section 4.4 of the protocol.

Within each pool, at least 4 quality control samples need to be established with varying concentrations ranging between plus or minus 50% of the target value of that pool. Thus for the medium-high cadmium in blood pool, the theoretical values of the quality control samples may range from 5 to 15 ug/l, (the target value is 10 ug/l). At least 4 unique theoretical values must be represented in this pool.

The range of theoretical values of plus or minus 50% of the target value of a pool means that there will be overlap of the pools. For example, the range of values for the medium-low pool for cadmium in blood is 3.5 to 10.5 ug/l while the range of values for the medium-high pool is 5 to 15 ug/l.

Therefore, it is possible for a quality control sample from the medium-low pool to have a higher concentration of cadmium than a quality control sample from the medium-high pool.

Quality control samples may be obtained as commercially available reference materials, internally prepared, or both. Internally prepared samples should be well characterized and traced or compared to a reference material for which a consensus value for concentration is available. Levels of analyte in the quality control samples must be concealed from the analyst prior to the reporting of analytical results. Potential sources of materials that may be used to construct quality control samples are listed in Section 3.3.1 of the protocol.

Before any compliance samples are analyzed, control limits must be established. Control limits should be calculated for every pool of each analyte for which determinations will be made and control charts should be kept for each pool of each analyte. A separate set of control charts and control limits should be established for each analytical instrument in a laboratory that will be used for analysis of compliance samples.

At the beginning of this QA/QC program, control limits should be based on the results of the analysis of 20 quality control samples from each pool of each analyte. For any given pool, the 20 quality control samples should be run on 20 different days. Although no more than one sample should be run from any single pool on a particular day, a laboratory may run quality control samples from different pools on the same day. This constitutes a set of initial characterization runs.

For each quality control sample analyzed, the value F/T (defined in the glossary) should be calculated. To calculate the control limits for a pool of an analyte, it is first necessary to calculate the mean, of the F/T values for each quality control sample in a pool and then to calculate its standard deviation o(sigma). Thus, for the control limit for a pool, the mean is calculated as:

$$\frac{\left(\sum \frac{F}{T}\right)}{N}$$

And O(sigma) is calculated as

$$\left[\frac{\sum\left(\frac{F}{T}-\overline{X}\right)^2}{(N-1)}\right]^{\frac{1}{2}}$$

Where N is the number of quality control samples run for a pool.

The control limit for a particular pool is then given by the mean plus or minus 2 standard deviations (unbiased).

The control limits may be no greater than 40% of the mean F/T value. If three standard deviations are greater than 40% of the mean F/T value, then analysis of compliance samples may not begin(1). Instead, an investigation into the causes of the large standard deviation should begin, and the inadequacies must be remedied. Then, control limits must be reestablished which will mean repeating the running 20 quality control samples from each pool over 20 days.

Footnote(1) Note that the value, "40%" may change over time as experience is gained with the program.

Internal Quality Control Analyses and Maintaining Control

Once control limits have been established for each pool of an analyte, analysis of compliance samples may begin. During any run of compliance samples, quality control samples are to be interspersed at a rate of no less than 5% of the compliance sample workload. When quality control samples are run, however, they should be run in sets consisting of one quality control sample from each pool. Therefore, it may be necessary, at times, to intersperse quality control samples at a rate greater than 5%.

There should be at least one set of quality control samples run with any analysis of compliance samples. At a minimum, for example, 4 quality control samples should be run even if only 1 compliance sample is run. Generally, the number of quality control samples that should be run are a multiple of four with the minimum equal to the smallest multiple of four that is greater than 5% of the total number of samples to be run. For example, if 300 compliance samples of an analyte are run, then at least 16 quality control samples should be run (16 is the smallest multiple of four that is greater than 15, which is 5% of 300).

Control charts for each pool of an analyte (and for each instrument in the laboratory to be used for analysis of compliance samples) should be established by plotting F/T versus date as the quality control sample results are reported. On the graph there should be lines representing the control limits for the pool, the mean F/T limits for the pool, and the theoretical F/T of 1.000. Lines representing plus or minus (+ or -) 2 unbiased standard deviation should also be represented on the charts. A theoretical example of a control chart is presented in Figure 1.

FIGURE 1
THEORETICAL EXAMPLE OF A CONTROL CHART FOR A POOL OF AN ANALYTE

						X					1.162	(Upper Control Limit)
		X									1.096	(Upper 2 unbiased standard deviation Line)
	X										1.000	(Theoretical Mean)
				X	X		X	X		X	0.964	(Mean)
			X								0.832	(Lower 2 unbiased standard deviation Line)
									X		0.766	(Lower Control Limit)
March	2	2	3	5	6	9	10	13	16	17		

All quality control samples should be plotted on the chart, and the charts should be checked for visual trends. If a quality control sample falls above or below the control limits for its pool, then corrective steps must be taken (see the section on corrective actions below). Once a laboratory's program has been established, control limits should be updated every 2 months.

The updated control limits should be calculated from the results of the last 100 quality control samples run for each pool. If 100 quality control samples from a pool have not been run at the time of the update, then the limits should be based on as many as have been run provided at least 20 quality control samples from each pool have been run over 20 different days.

The trends that should be looked for on the control charts are:

1. 10 consecutive quality control samples falling above or below the mean;
2. 3 consecutive quality control samples falling more than 2 unbiased standard deviation from the mean (above or below the 2 unbiased standard deviation lines of the chart); or
3. the mean calculated to update the control limits falls more than 10% above or below the theoretical mean of 1.000.

If any of these trends is observed, then all analysis must be stopped, and an investigation into the causes of the errors must begin. Before the analysis of compliance samples may resume, the inadequacies must be remedied and the control limits must be reestablished for that pool of an analyte. Reestablishment of control limits will entail running 20 sets of quality control samples over 20 days.

Note that alternative procedures for defining internal quality control limits may also be acceptable. Limits may be based, for example, on proficiency testing, such as + or - 1 ug or 15% of the mean (whichever is greater). These should be clearly defined.

Corrective actions

Corrective action is the term used to describe the identification and remediation of errors occurring within an analysis. Corrective action is necessary whenever the result of the analysis of any quality control sample falls outside of the established control limits. The steps involved may include simple things like checking calculations of basic instrument maintenance, or it may involve more complicated actions like major instrument repair. Whatever the source of error, it must be identified and corrected (and a Corrective Action Report (CAR) must be completed. CARs should be kept on file by the laboratory.

Attachment 2

Creatinine in Urine (Jaffe Procedure)

Intended Use: The CREA pack is used in the Du Pont ACA(R) discrete clinical analyzer to quantitatively measure creatinine in serum and urine.

Summary: The CREA method employs a modification of the kinetic Jaffe reaction reported by Larsen. This method has been reported to be less susceptible than conventional methods to interference from noncreatinine, Jaffe-positive compounds(1).

Footnote(1) Note: Numbered subscripts refer to the bibliography and lettered subscripts refer to footnotes.

A split sample comparison between the CREA method and a conventional Jaffe procedure on Autoanalyzer(R) showed a good correlation. (See Specific Performance Characteristics).

Autoanalyzer,(R) is a registered trademark of Technicon Corp., Tarrytown, NY.

Principles of Procedure: In the presence of a strong base such as NaOH, picrate reacts with creatinine to form a red chromophore. The rate of increasing absorbance at 510 nm due to the formation of this chromophore during a 17.07-second measurement period is directly proportional to the creatinine concentration in the sample.

NaOH

Creatinine + Picrate ----> Red chromophore (absorbs at 510 nm)			
Reagents:			
Compartment(a)	**Form**	**Ingredient**	**Quantity(b)**
No. 2, 3, & 4	Liquid	Picrate	0.11 mmol.
No. 6	Liquid	NaOH (for pH adjustment(c)	
Footnote(a)	Compartments are numbered 1-7, with compartment #7 located closest to pack fill position #2.		
Footnote(b)	Nominal value at manufacture.		
Footnote(c)	See Precautions.		

Precautions: Compartment #6 Contains 75uL of 10 N NaOH; Avoid Contact; Skin Irritant; Rinse Contacted Area With Water. Comply With OSHA's Bloodborne Pathogens Standard While Handling Biological Samples (29 CFR 1910.1039).

Used Packs Contain Human Body Fluids; Handle With Appropriate Care.

FOR IN VITRO DIAGNOSTIC USE.

Mixing and Diluting: Mixing and diluting are automatically performed by the ACA(R) discrete clinical analyzer. The sample cup must contain sufficient quantity to accommodate the sample volume plus the "dead volume"; precise cup filling is not required.

SAMPLE CUP VOLUMES (uL)

Analyzer	**Standard**		**Microsystem**	
	Dead	**Total**	**Dead**	**Total**
II, III	120	3000	10	500
IV, SX	120	3000	30	500
V	90	3000	10	500

Storage of Unprocessed Packs: Store at 2-8 deg. C. Do not freeze. Do not expose to temperatures above 35 deg. C or to direct sunlight.

Expiration: Refer to EXPIRATION DATE on the tray label.

Specimen Collection: Serum or urine can be collected and stored by normal procedures.(2)

Known Interfering Substances:(3)

- Serum Protein Influence -- Serum protein levels exert a direct influence on the CREA assay. The following should be taken into account when this method is used for urine samples and when it is calibrated: Aqueous creatinine standards or urine specimens will give CREA results depressed by approximately 0.7 mg/dL [62 umol/L](d) and will be less precise than samples containing more than 3 g/dL [30 g/L] protein.

Footnote(d) Systeme International d'unites (S.I. Units) are in brackets.

All urine specimens should be diluted with an albumin solution to give a final protein concentration of at least 3 g/dL [30 g/L]. Du Pont Enzyme Diluent (Cat. #790035-901) may be used for this purpose.

- High concentration of endrogenous bilirubin (>20 mg/dL [>342 umol/L]) will give depressed CREA results (average depression 0.8 mg/dL [71 umol/L]).(4)

- Grossly hemolyzed (hemoglobin >100 mg/dL [>62 umol/L]) or visibly lipemic specimens may cause falsely elevated CREA results.(5),(6)

- The following cephalosporin antibiotics do not interfere with the CREA method when present at the concentrations indicated. Systematic inaccuracies (bias) due to these substances are less than or equal to 0.1 mg/dL [8.84 umol/L] at CREA concentrations of approximately 1 mg/dL [88 umol/L].

Antibiotic	**Peak Serum Level (7),(8),(9)**		**Drug Concentration**	
	mg/dL	**[mmol/L]**	**mg/dL**	**[mmol/L]**
Cephaloridine	1.4	0.3	25	6.0
Cephalexin	0.6 – 2.0	0.2 – 0.6	25	7.2
Cephamandole	1.3 – 2.5	0.3 – 0.5	25	4.9
Cephapirin	2.0	D0.4	25	5.6
Cephradine	1.5 – 2.0	0.4 – 0.6	25	7.1
Cefazolin	2.5 – 5.0	0.55 – 1.1	50	11.0

- The following cephalosporin antibiotics have been shown to affect CREA results when present at the indicated concentrations. System inaccuracies (bias) due to these substances are greater that 0.1 mg/dL [8.84 umol/L] at CREA concentrations of:

Antibiotic	**Peak Serum Level (8),(10)**		**Drug Concentration**		
	mg/dL	**[mmol/L]**	**mg/dL**	**[mmol/L]**	**Effect**
Cephalothin	1 – 6	0.2 – 1.5	100	25.2	Below 20 – 25 percent
Cephoxitin	2.0	0.5	5.0	1.2	Above 35 - 40 percent

- The single wavelength measurement used in this method eliminates interference from chromophores whose 510 nm absorbance is constant throughout the measurement period.

- Each laboratory should determine the acceptability of its own blood collection tubes and serum separation products. Variations in these products may exist between manufacturers and, at times, from lot to lot.

Procedure:

TEST MATERIALS

Item	II,III DuPont cat No.	IV, SX DuPont cat No.	V DuPont cat No.
ACA(R) CREA Analytical Test Pack	701976901	701976901	701976901
Sample System Kit	710642901	710642901	713697901
or			
Micro Sample System Kit	702694901	710356901	NA
and			
Micro Sample System Holders	702785000	NA	NA
DYLUX(R) Photosensitive Printer Paper	700036000	NA	NA
Thermal Printer Paper	NA	710639901	713645901
DuPont Purified Water	704209901	710615901	710815901
Cell Wash Solution	701864901	710664901	710864901

Test Steps: The operator need only load the sample kit and appropriate test pack(s) into a properly prepared ACA(R) discrete clinical analyzer. It automatically advances the pack(s) through the test steps and prints a result(s). See the Instrument Manual of the ACA(R) analyzer for details of mechanical travel of the test pack(s).

Preset Creatinine (CREA) Test Conditions

- Sample Volume: 200 uL.
- Diluent: Purified Water.
- Temperature: 37.0 + or - 0.1 deg. C.
- Reaction Period: 29 seconds.
- Type of Measurement: Rate.
- Measurement Period: 17.07 seconds.
- Wavelength: 510 nm.
- Units: mg/dL [umol/L].

Calibration: The general calibration procedure is described in the Calibration/Verification chapter of the Manuals. The following information should be considered when calibrating the CREA method.

- Assay Range: 0-20 mg/mL [0-1768 umol/L](e)

Footnote(e) For the results in S.I. units [umol/L] the conversion factory is 88.4.

Reference Material: Protein containing primary standards(f) or secondary calibrators such as Du Pont Elevated Chemistry Control (Cat. #790035903) and Normal Chemistry Control (Cat. #790035905)(g).

Footnote(f) Refer to the Creatinine Standard Preparation and Calibration Procedure available on request from a Du Pont Representative.

Footnote(g) If the Du Pont Chemistry Controls are being used, prepare them according to the instructions on the product insert sheets.

- Suggested Calibration Levels: 1,5,20, mg/mL [88, 442, 1768 umol/L].
- Calibration Scheme: 3 levels, 3 packs per level.
- Frequency: Each new pack lot. Every 3 months for any one pack lot.

PRESET CREATININE (CREA) TEST CONDITIONS

Item	ACA(R) II analyzer	ACA(R) III, IV, SX, V analyzer
Count by	One(1) [Five (5)]	NA
Decimal Point	0.0 mg/dL	000.0 mg/dL
Location	[000. umol/L]	000 umol/L]
Assigned Starting	999.8	- 1.000 E1
Point or Offset C(0)	[9823.]	[- 8.840 E2]
Scale Factor or	0.2000	2.004 E-1(h)
Assigned	mg/dL/count(h)	
Linear Term C(1)(h)	[0.3536 umol/L/count.	[1.772E1]

Footnote(h) The preset scale factor (linear term) was derived from the molar absorptivity of the indicator and is based on an absorbance to activity relationship (sensitivity) of 0.596 (mA/min)/(U/L). Due to small differences in filters and electronic components between instruments, the actual scale factor (linear term) may differ slightly from that given above.

Quality Control: Two types of quality control procedures are recommended:

- General Instrument Check. Refer to the Filter Balance Procedure and the Absorbance Test Method described in the ACA Analyzer Instrument Manual. Refer also to the ABS Test Methodology literature.

- Creatinine Method Check. At least once daily run a CREA test on a solution of known creatinine activity such as an assayed control or calibration standard other than that used to calibrate the CREA method. For further details review the Quality Assurance Section of the Chemistry Manual. The result obtained should fall within acceptable limits defined by the day-to-day variability of the system as measured in the user's laboratory. (See SPECIFIC PERFORMANCE CHARACTERISTICS for guidance.) If the result falls outside the laboratory's acceptable limits, follow the procedure outlined in the Chemistry Troubleshooting Section of the Chemistry Manual.

A possible system malfunction is indicated when analysis of a sample with five consecutive test packs gives the following results:

Level	SD
1 mg/dL	>0.15 mg/dL
[88 umol/L]	[>13 umol/L]
20 mg/dL	>0.68 mg/dL
[1768 umol/L]	[>60 umol/L]

Refer to the procedure outlined in the Trouble Shooting Section of the Manual.

Results: The ACA(R) analyzer automatically calculates and prints the CREA result in mg/dL [umol/L].

Limitation of Procedure: Results >20 mg/dL [1768 umol/L]:

- Dilute with suitable protein base diluent. Reassay. Correct for diluting before reporting.

The reporting system contains error messages to warn the operator of specific malfunctions. Any report slip containing a letter code or word immediately following the numerical value should not be reported. Refer to the Manual for the definition of error codes.

REFERENCE INTERVAL	
Serum:(11)(i)	
Males	0.8-1.3 md/dL [71-115 umol/L]
Females	0.6-1.0 md/dL [53-88 umol/L]
Urine:(12)	
Males	0.6-2.5 g/24 hr [53-221 mmol/24 hr]
Females	0.6-1.5 g/24 hr [53-133 mmol/24 hr]

Footnote(i) Reference interval data obtained from 200 apparently healthy individuals (71 males, 129 females) between the ages of 19 and 72.

Each laboratory should establish its own reference intervals for CREA as performed on the analyzer. Specific Performance Characteristics(j)

Footnote(j) All specific performance characteristics tests were run after normal recommended equipment quality control checks were performed (see Instrument Manual).

REPRODUCIBILITY(k)			
Material	**Mean**	**Standard Deviation (% CV)**	
		Within-Run	**Between-Day**
Lyophilized	1.3	0.05 (3.7)	0.05 (3.7)
Control	[115]	[4.4]	[4.4]
Lyophilized	20.6	0.12 (0.6)	0.37 (1.8)
Control	[1821]	[10.6]	[32.7]

Footnote(k) Specimens at each level were analyzed in duplicate for twenty days. The within-run and between-day standard deviations were calculated by the analysis of variance method.

CORRELATION
(Regression statistics)(l)

Comparative Method	Slope	Intercept	Correlation Coefficient	n
Autoanalyzer (R)	1.03	0.03[2.7]	0.997	260

Footnote(l) Model equation for regression statistics is:

Result of ACA(R) Analyzer = Slope (Comparative method result) + intercept Assay Range:(m) 0.0-20.0 mg/dl [0-1768 umol]

Footnote(m) See REPRODUCIBILITY for method performance within the assay range.

Analytical Specificity:
See KNOWN INTERFERING SUBSTANCES section for details.

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(8) Henry, JB, Clinical Diagnosis and Management by Laboratory Methods, W.B. Saunders Co., Philadelphia, PA 1979, Vol. III.
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Attachment 3
Analysis of Creatinine for the Normalization of Cadmium and Beta-2-Microglobulin Concentrations in Urine (OSLTC Procedure).

Matrix: Urine

Target Concentration: 1.1 g/L (this amount is representative of creatinine concentrations found in urine).

Procedure: A 1.0 mL aliquot of urine is passed through a C18 SEP-PAK(R) (Waters Associates). Approximately 30 mL of HPLC (high performance liquid chromatography) grade water is then run through the SEP-PAK. The resulting solution is diluted to volume in a 100-mL volumetric flask and analyzed by HPLC using an ultraviolet (UV) detector.

Special Requirements: After collection, samples should be appropriately stabilized for cadmium (Cd) analysis by using 10% high purity (with low Cd background levels) nitric acid (exactly 1.0 mL of 10% nitric acid per 10 mL of urine) or stabilized for Beta-2-Microglobulin (B2M) by taking to pH 7 with dilute NaOH (exactly 1.0 mL of 0.11 N NaOH per 10 mL of urine). If not immediately analyzed, the samples should be frozen and shipped by overnight mail in an insulated container.

Date: January 1992
David B. Armitage,
Duane Lee,
Chemists.
Organic Service Branch II OSHA Technical Center Salt Lake City, Utah.

1. General Discussion

1.1. Background

1.1.1. History of procedure

Creatinine has been analyzed by several methods in the past.

The earliest methods were of the wet chemical type. As an example, creatinine reacts with sodium picrate in basic solution to form a red complex, which is then analyzed calorimetrically (Refs. 5.1. and 5.2.).

Since industrial hygiene laboratories will be analyzing for Cd and B2M in urine, they will be normalizing those concentrations to the concentration of creatinine in urine. A literature search revealed several HPLC methods (Refs. 5.3., 5.4., 5.5. and 5.6.) for creatinine in urine and because many industrial hygiene laboratories have HPLC equipment, it was desirable to develop an industrial hygiene HPLC method for creatinine in urine.

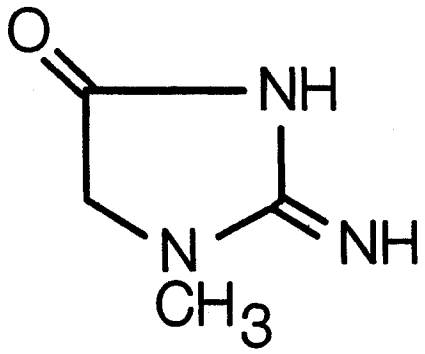
The method of Hausen, Fuchs, and Wachter was chosen as the starting point for method development. SEP-PAKs were used for sample clarification and cleanup in this method to protect the analytical column. The urine aliquot which has been passed through the SEP-PAK is then analyzed by reverse-phase HPLC using ion-pair techniques.

This method is very similar to that of Ogata and Taguchi (Ref. 5.6.), except they used centrifugation for sample clean-up. It is also of note that they did a comparison of their HPLC results to those of the Jaffe method (a picric acid method commonly used in the health care industry) and found a linear relationship of close to 1:1. This indicates that either HPLC or colorimetric methods may be used to measure creatinine concentrations in urine.

1.1.2. Physical properties (Ref. 5.7.)

- Molecular weight: 113.12
- Molecular formula: C(4)-H(7)-N(3)-O
- Chemical name: 2-amino-1.5-dihydro-1-methyl-4H-imidazol-4-one
- CAS#: 60-27-5
- Melting point: 300 deg. C (decomposes)
- Appearance: white powder
- Solubility: soluble in water; slightly soluble in alcohol; practically insoluble in acetone, ether, and chloroform
- Synonyms: 1-methylglycocyamidine, 1-methylhydantoin-2-imide
- Structure: see Figure #1

Figure 1



1.2. Advantages

1.2.1. This method offers a simple, straightforward, and specific alternative method to the Jaffe method.

1.2.2. HPLC instrumentation is commonly found in may industrial hygiene laboratories.

2. Sample stabilization procedure

2.1. Apparatus Metal-free plastic container for urine sample.

2.2. Reagents

2.2.1. Stabilizing Solution -

(1) Nitric acid (10% high purity with low Cd background levels) for stabilizing urine for Cd analysis or

(2) NaOH, 0.11 N, for stabilizing urine for B2M analysis.

2.2.2. HPLC grade water

2.3. Technique

2.3.1. Stabilizing solution is added to the urine sample (see section 2.2.1.).

The stabilizing solution should be such that for each 10 mL of urine, add exactly 1.0 mL of stabilizer solution. (Never add water or urine to acid or base. Always add acid or base to water or urine.) Exactly 1.0 mL of 0.11 N NaOH added to 10 mL of urine should result in a pH of 7. Or add 1.0 mL of 10% nitric acid to 10 mL of urine.

2.3.2. After sample collection seal the plastic bottle securely and wrap it with an appropriate seal.

Urine samples should be frozen and then shipped by overnight mail (if shipping is necessary) in an insulated container. (Do not fill plastic bottle too full. This will allow for expansion of contents during the freezing process.)

2.4. The Effect of Preparation and Stabilization Techniques on Creatinine Concentrations.

Three urine samples were prepared by making one sample acidic, not treating a second sample, and adjusting a third sample to pH 7. The samples were analyzed in duplicate by two different procedures. For the first procedure a 1.0 mL aliquot of urine was put in a 100 - mL volumetric flask, diluted to volume with HPLC grade water, and then analyzed directly on an HPLC. The other procedure used SEP-PAKs. The SEP-PAK was rinsed with approximately 5 mL of methanol followed by approximately 10 mL of HPLC grade water and both rinses were discarded. Then, 1.0 mL of the urine sample was put through the SEP-PAK, followed by 30 mL of HPLC grade water. The urine and water were transferred to a 100 – mL volumetric flask, diluted to volume with HPLC grade water, and analyzed by HPLC. These three urine samples were analyzed on the day they were obtained and then frozen.

The results show that whether the urine is acidic, untreated or adjusted to pH 7, the resulting answer for creatinine is essentially unchanged. The purpose of stabilizing the urine by making it acidic or neutral is for the analysis of Cd or B2M respectively.

COMPARISON OF PREPARATION AND STABILIZATION TECHNIQUES

Sample	w/o SEP-PAC (g/L creatinine)	with SEP-PAK (g/L creatinine)
Acid	1.10	1.10
Acid	1.11	1.10
Untreated	1.12	1.11
Untreated	1.11	1.12
pH 7	1.08	1.02
pH 7	1.11	1.08

2.5. Storage

After 4 days and 54 days of storage in a freezer, the samples were thawed, brought to room temperature and analyzed using the same procedures as in section 2.4. The results of several days of storage show that the resulting answer for creatinine is essentially unchanged.

STORAGE DATA

Sample	4 days		54 days	
	w/o SEP-PAC (g/L creatinine)	with SEP-PAK (g/L creatinine)	w/o SEP-PAC (g/L creatinine)	with SEP-PAK (g/L creatinine)
Acid	1.09	1.09	1.08	1.09
Acid	1.10	1.10	1.09	1.10
Acid	-	-	1.09	1.09
Untreated	1.13	1.14	1.09	1.11
Untreated	1.15	1.14	1.10	1.10
Untreated	-	-	1.09	1.10
pH 7	1.14	1.13	1.12	1.12
pH 7	1.14	1.13	1.12	1.12
pH 7	-	-	1.12	1.12

2.6. Interferences

None.

2.7. Safety precautions

2.7.1. Make sure samples are properly sealed and frozen before shipment to avoid leakage.

2.7.2. Follow the appropriate shipping procedures.

The following modified special safety precautions are based on those recommended by the Centers for Disease Control (CDC)(Ref. 5.8.) and OSHA's Bloodborne Pathogens standard (29 CFR 1910.1039).

2.7.3. Wear gloves, lab coat, and safety glasses while handling all human urine products.

Disposable plastic, glass, and paper (pipet tips, gloves, etc.) that contact urine should be placed in a biohazard autoclave bag.

These bags should be kept in appropriate containers until sealed and autoclaved. Wipe down all work surfaces with 10% sodium hypochlorite solution when work is finished.

2.7.4. Dispose of all biological samples and diluted specimens in a biohazard autoclave bag at the end of the analytical run.

2.7.5. Special care should be taken when handling and dispensing nitric acid.

Always remember to add acid to water (or urine). Nitric acid is a corrosive chemical capable of severe eye and skin damage. Wear metal-free gloves, a lab coat, and safety glasses. If the nitric acid comes in contact with any part of the body, quickly wash with copious quantities of water for at least 15 minutes.

2.7.6. Special care should be taken when handling and dispensing NaOH.

Always remember to add base to water (or urine). NaOH can cause severe eye and skin damage. Always wear the appropriate gloves, a lab coat, and safety glasses. If the NaOH comes in contact with any part of the body, quickly wash with copious quantities of water for at least 15 minutes.

3. Analytical Procedure

3.1. Apparatus

3.1.1. A high performance liquid chromatograph equipped with pump, sample injector and UV detector.
3.1.2. A C18 HPLC column; 25 cm X 4.6 mm I.D.
3.1.3. An electronic integrator, or some other suitable means of determining analyte response.
3.1.4. Stripchart recorder.
3.1.5. C18 SEP-PAKs (Waters Associates) or equivalent.
3.1.6. Luer-lock syringe for sample preparation (5 mL or 10 mL).
3.1.7. Volumetric pipettes and flasks for standard and sample preparation.
3.1.8. Vacuum system to aid sample preparation (optional).

3.2. Reagents

3.2.1. Water, HPLC grade.
3.2.2. Methanol, HPLC grade.
3.2.3. PIC B-7(R) (Waters Associates) in small vials.
3.2.4. Creatinine, anhydrous, Sigma Chemical Corp., purity not listed.
3.2.5. 1-Heptanesulfonic acid, sodium salt monohydrate.
3.2.6. Phosphoric acid.
3.2.7. Mobile phase.

It can be prepared by mixing one vial of PIC B-7 into a 1 L solution of 50% methanol and 50% water. The mobile phase can also be made by preparing a solution that is 50% methanol and 50% water with 0.005M heptanesulfonic acid and adjusting the pH of the solution to 3.5 with phosphoric acid.

3.3. Standard preparation

3.3.1. Stock standards are prepared by weighing 10 to 15 mg of creatinine. This is transferred to a 25-mL volumetric flask and diluted to volume with HPLC grade water.

3.3.2. Dilutions to a working range of 3 to 35 ug/mL are made in either HPLC grade water or HPLC mobile phase (standards give the same detector response in either solution).

3.4. Sample preparation

3.4.1. The C18 SEP-PAK is connected to a Luer-lock syringe. It is rinsed with 5 mL HPLC grade methanol and then 10 mL HPLC grade methanol and then 10 mL of HPLC grade water. These rinses are discarded.

3.4.2. Exactly 1.0 mL of urine is pipetted into the syringe. The urine is put through the SEP-PAK into a suitable container using a vacuum system.

3.4.3. The walls of the syringe are rinsed in several stages with a total of approximately 30 mL of HPLC grade water. These rinses are put through the SEP-PAK into the same container. The resulting solution is transferred to a 100-mL volumetric flask and then brought to volume with HPLC grade water.

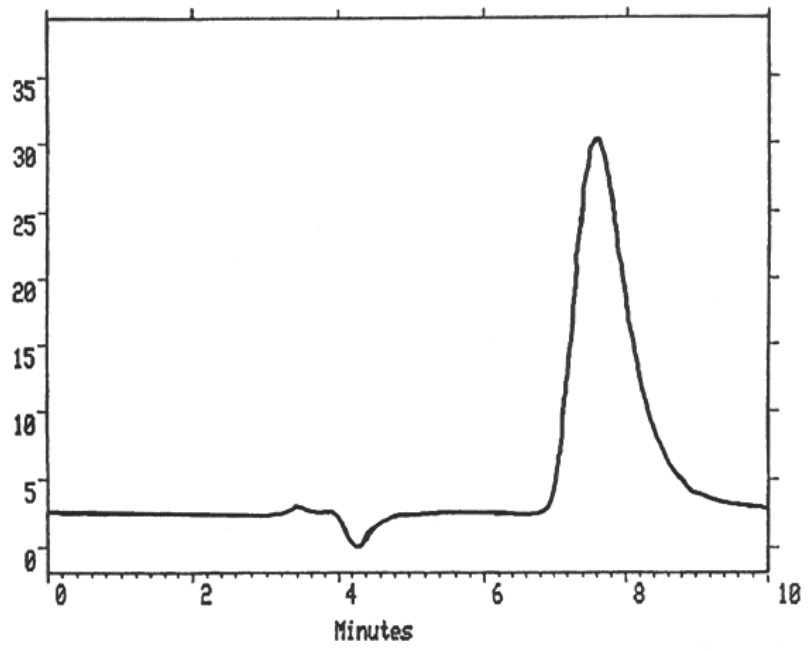
3.5. Analysis (conditions and hardware are those used in this evaluation.)

3.5.1. Instrument conditions

- Column: Zorbax(R) ODS, 5-6 um particle size; 25 cm X 4.6 mm I.D.
- Mobile phase: See Section 3.2.7.
- Detector: Dual wavelength UV; 229 nm (primary) 254 nm (secondary).
- Flow rate: 0.7 mL/minute.
- Retention time: 7.2 minutes.
- Sensitivity: 0.05 AUFS.
- Injection volume: 20 uL

3.5.2. Chromatogram (See Figure #2).

Figure 2
CHROMATOGRAM OF A CREATININE STANDARD



3.6. Interferences

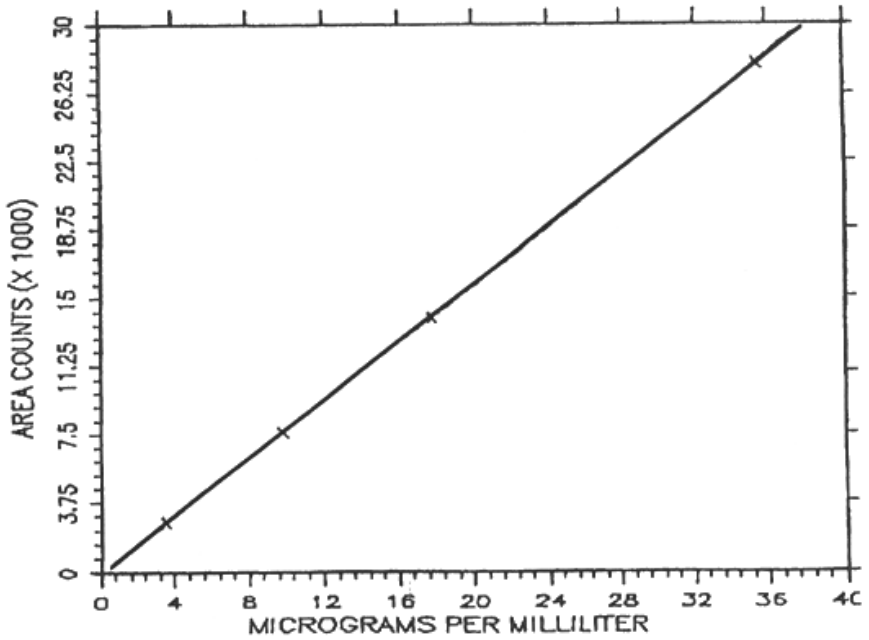
3.6.1. Any compound that has the same retention time as creatinine and absorbs at 229 nm is an interference.

3.6.2. HPLC conditions may be varied to circumvent interferences. In addition, analysis at another UV wavelength (i.e. 254 nm) would allow a comparison of the ratio of response of a standard to that of a sample. Any deviations would indicate an interference.

3.7. Calculations

3.7.1. A calibration curve is constructed by plotting detector response versus standard concentration (See Figure #3).

Figure 3
CALIBRATION CURVE FOR CREATININE



3.7.2. The concentration of creatinine in a sample is determined by finding the concentration corresponding to its detector response. (See Figure #3).

3.7.3. The ug/mL creatinine from section 3.7.2. is then multiplied by 100 (the dilution factor). This value is equivalent to the micrograms of creatinine in the 1.0 mL stabilized urine aliquot or the milligrams of creatinine per liter of urine. The desired units, g/L is determined by the following relationship:

$$g/L = \frac{ug/mL}{1000} = \frac{mg/L}{1000}$$

3.7.4. The resulting value for creatinine is used to normalize the urinary concentration of the desired analyte (A) (Cd or B2M) by using the following formula.

$$\text{ug A/g creatinine} = \frac{\text{ug A/g creatinine}}{\text{g/L creatinine}}$$

Where A is the desired analyte. The protocol of reporting such normalized results is ug A/g creatinine.

3.8. Safety precautions. See section 2.7.

4. Conclusions

The determination of creatinine in urine by HLPC is a good alternative to the Jaffe method for industrial hygiene laboratories. Sample clarification with SEP-PAKs did not change the amount of creatinine found in urine samples. However, it does protect the analytical column. The results of the creatinine in urine procedure are unaffected by the pH of the urine sample under the conditions tested by this procedure. Therefore, no special measures are required for creatinine analysis whether the urine sample has been stabilized with 10% nitric acid for the Cd analysis or brought to a pH of 7 with 0.11 NaOH for the B2M analysis.

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