



March 8, 2017

Dept. of Labor & Industries
DOSH Discrimination, Audit, & Appeals
Received

MAR 30 2017

Ms. Ann Soiza
Assistant Director
Division of Occupational Safety and Health
Washington State Department of Labor & Industries
PO Box 44000
Olympia, WA 98504-4000

RE: Washington State Rulemaking Related to Lead

Dear Ms. Soiza,

The Pacific Northwest Section of AIHA supports the rulemaking process to update the occupational lead standards (WAC 296-62-07521 and WAC 296-155-176) in Washington State.

There is a broad scientific consensus on the health effects of low-level lead exposure that demonstrates that worker blood lead levels (BLLs) should be reduced below current WAC criteria in order to reduce potential neurological and neurobehavioral effects, and reproductive effects. We are pleased to see that Washington State is in the process of updating the Washington lead standards to reflect the current scientific knowledge of lead toxicity.

We support changes to the rule that will include 1) reductions in the concentrations of lead in air that trigger protective measures and actions, 2) lowering the blood lead level that prompts medical removal from work and surveillance requirements, 3) enhanced medical monitoring for lead-related health problems, and 4) modifications related to protective clothing, hygiene practices, training, and education.

Thank you for your efforts to protect Washington State workers from lead exposures in the workplace. We look forward to reviewing the draft rule when it is ready.

Sincerely,

James R. Martin, CIH
President, Pacific Northwest Section – American Industrial Hygiene Association (PNS-AIHA)