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DIVISION OF OCCUPATIONAL SAFETY & HEALTH
WASHINGTON STATE ASSOCIATION OF LOCAL PUBLIC HEALTH OFFICIALS

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

November 28, 2016

Ms. Soiza,

The Local Health Officers Committee (HOC) and Environmental Public Health Directors Committee (EPHC) of WSALPHO support updates to the two codes that are designed to protect workers from occupational exposures to lead:

- WAC 296-62-07521: General industry lead standard
- WAC 296-155-176: Lead in construction standard


More specifically, our committees wish to support Public Health--Seattle and King County's (PHSKC) recommendations to:


1. Decrease the permissible concentrations of lead in air that trigger regulatory action,
2. Lower the permissible blood lead level that prompts medical removal from work,
3. Enhance medical monitoring for lead-related health problems and
4. Make improvements to protective clothing, hygiene practices, training, and education

These recommendations should not only improve worker safety, but also reduce cases of workers bringing lead contamination home to their families inadvertently exposing family members including children. We have enclosed the PHSKC factsheet for your reference.

As you know, according to Centers for Disease Control there is no safe level of lead exposure.

Respectfully,


Alan Melnick, MD, MPH, CPH
Clark County Health Officer
Chair, HOC


Todd Phillips R.S.
Environmental Health Director GCHD
Chair, EPHC



King County

Updating the occupational lead standards in Washington state

Updated October 12, 2016

Objective

Ensure the Washington State Department of Labor and Industries (L&I) issues draft rules to update the occupational lead standards that protect workers and their families from lead poisoning.

No level of lead exposure is safe

According to the Centers for Disease Control and Prevention (CDC), there is no safe level of lead exposure.

The occupational lead standards are 45 years old

Washington state's current standards are based on our scientific knowledge about lead toxicity from the 1970s. We now know that lead levels that were previously considered acceptable are not safe.

The state's rules have not been updated to match today's science.

Existing Federal and state laws do not adequately protect workers from lead poisoning

Workers can legally be exposed to dangerous levels of lead that are associated with serious health effects, like cardiovascular disease, infertility, and miscarriage.

Women exposed to lead in their workplaces can also expose their unborn children to lead, resulting in birth defects.

Workers can also inadvertently bring lead dust into their homes from work – on their clothes, boots, tools, and shoes – exposing their families and posing a special risk to children in the home.

Lead poisoning disproportionately impacts workers of color and immigrants

In King County, workers of color are more likely to experience lead poisoning – both in general industry and the construction trades.

A recent analysis of lead poisoning data for adult residents of King County showed that most cases are associated with work in battery manufacturing,

bridge painting, and gun ranges. Hispanic and Asian workers are at particular risk.

L&I is currently updating the lead standards

In 2012, Public Health – Seattle & King County (PHSKC) petitioned Governor Inslee and L&I to update our outdated occupational lead standards (WAC 296-62-07521 and WAC 296-155-176).

L&I has convened a series of stakeholder meetings to gather recommendations and has opened rulemaking by filing a CR101. We expect L&I to release its draft updated lead rules in 2017.

PHSKC is working to ensure the state's lead rules are based on the best available science and data

We have developed a series of recommendations to ensure that workers maintain their blood lead levels below 10 micrograms of lead per deciliter of whole blood.

PHSKC is recommending: 1) reductions in the concentrations of lead in air that trigger regulatory action (i.e., the action level and permissible exposure limit), 2) lowering the blood lead level that prompts medical removal from work, 3) enhanced medical monitoring for lead-related health problems, and 4) other improvements to protective clothing, hygiene practices, training, and education.

Upcoming opportunity for public involvement

L&I is holding its next stakeholder meeting at 9 am on October 25th at L&I's Tukwila location: 12806 Gateway Drive South, Tukwila, WA 98168.

More information about PHSKC's recommendations and L&I's stakeholder process is available at www.lni.wa.gov/Safety/Rules/WhatsNew/LeadSafety/default.asp.

For additional information, please contact:

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