

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

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

September 28, 2017

Dear Ms. Soiza:

Tacoma-Pierce County Health Department appreciates the opportunity to provide comments regarding revisions to Washington State's occupational lead standards:

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

These standards have not been updated since the 1970's and are based on outdated scientific and medical information. Current evidence and scientific consensus indicate that significant adverse health effects-including high blood pressure, decreased kidney function, reproductive effects and neurological impairments- are associated with exposure levels well below the existing standards.

We strongly support suggested changes in Medical Surveillance and Medical Removal Protection, as well as a lowering of the Action Level and Permissible Exposure Level. Recommended changes to requirements for Protective Clothing, Hygiene, Training, and Warning Signs further protect workers' health. We know one route of exposure to children is from a parent who is exposed to lead in the workplace. This lead is then carried home on clothing into the home environment. The new standard will be more protective of adults and therefore reduce the likelihood of a secondary exposure to children.

A disproportionate number of racial/ethnic minorities work in industries with exposures to lead (and other environmental hazards). The recommended changes to Washington State's occupational lead standards support a health equity approach by requiring that information is provided to workers in their language and in a way that is understandable to workers with low or no literacy skills.

We appreciate L&I's work to protect the health and safety of Washington State's workforce and we support your efforts to revise and update the occupational lead standards.

Sincerely,



Frank DiBiase  
Division Director  
Environmental Health Division