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DEC 1 - 2017

OFFICE OF THE ASSISTANT DIRECTOR
DIV OF OCCUPATIONAL SAFETY & HEALTH

Department of Environmental Health
Occupational Medicine
Residency Training Program
University of Cincinnati
Cincinnati, OH 45267-0056
Kettering Lab Complex
Phone (513) 558-5704
Fax (513) 558-4397

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 20, 2017

Dear Ms. Soiza:

As a physician board certified in Pediatrics and Occupational/Environmental Medicine, I care for and consult on cases of lead exposure in both children and adults. I am writing today to provide comments in support of the Washington State Department of Labor & Industries efforts to update the state's occupational lead standards. Washington State's occupational lead standards, like the analogous federal standards, do not adequately protect the working population. There is consensus among the medical community that adverse health effects, such as neurological problems, high blood pressure, reproductive risks, and decreased kidney function, can result from exposure levels that are well below those allowed by the current standards.

Strengthened occupational lead standards will not only protect workers but also their families – and, in particular, their children. In the past year alone, my clinical team and I have personally cared for at least five children in the Cincinnati area who were exposed to lead through take-home exposures from the workplace. Many of these children had blood lead levels greater than 20 mcg/dL, which indicates the presence of significant and highly concerning exposures in the home. Parents of these children were employed in a variety of industries, including construction, battery manufacturing, and other industrial work. If my experience in one clinic in Cincinnati is at all reflective of broader national trends, then occupational lead exposure may be an underappreciated source of childhood lead poisoning.

The Centers for Disease Control and Prevention (CDC) has stated that there is no safe blood lead level for children. Early life lead exposure can result in serious and irreversible consequences, such as neurological damage, school failure, and behavioral problems. Without improvements to state and federal occupational lead standards – **including specific, strong provisions to prevent take-home lead exposures** – children will continue to be at risk from workplace lead exposures and may suffer associated life-long adverse effects.

Thank you for your efforts to protect workers and their families from harmful lead exposure through critical updates to the Washington State occupational lead standards. Please feel free to contact me with any questions.

Sincerely,

Nicholas Newman, DO, MS, FAAP
Assistant Professor of Pediatrics and Environmental Health
University of Cincinnati College of Medicine
newmannnc@ucmail.uc.edu