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## **AIHA Testimony to the California Occupational Safety and Health Standards Board on the Board's Proposed Lead Regulations**

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My name is Mark Ames, I am here testifying on behalf of AIHA, as their director of government relations. AIHA is the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety in the workplace and community.

AIHA appreciates the opportunity to provide feedback on the proposed changes to California's lead regulations. Please note that my testimony is a high-level summary of the more detailed recommendations we have submitted.

Regarding exposure assessments and monitoring, we recommend that the following language be included in the final regulations: "The employer shall ensure that all exposure assessments and monitoring are performed by or under the supervision of a Certified Industrial Hygienist as codified in B&P Sections 2700-2705".

The Certified Industrial Hygienist credential represents the benchmark for competence in industrial hygiene. More than half of AIHA's nearly 8,500 members hold this distinction.

Regarding sampling and analysis, we recommend replacing the exposure assessment and monitoring "assurance" language in sections 1532.1 and 5198 with the following: "Laboratories used for lead analysis of samples collected for exposure assessment and monitoring shall be accredited by a program like ELLAP".

ELLAP stands for the Environmental Lead Laboratory Accreditation Program, which is recognized by the United States Environmental Protection Agency's National Lead Laboratory Accreditation Program.

Regarding routes of lead exposure, AIHA believes the best way to determine body lead burdens is by periodically measuring blood lead levels in workers wherever lead may be present as a result of workplace activities. Exposure to lead in the workplace can lead to

contaminated clothing. When contaminated clothing is worn and taken home, the result is possible lead exposure to the workers' family members or others they live with.

The ingestion route of exposure must also be considered in the rulemaking process by identifying when clothing must not be taken home and when shower facilities should be required to be provided. Similarly, the rule should contain requirements for leaving contaminated clothing in the workplace for proper cleaning without exposure to persons who launder the contaminated clothing. Additionally, the rule should specify when workers need to wash their hands and face before eating, drinking, or smoking.

In conclusion, my testimony represents only a high-level summary of the more detailed comments that AIHA has submitted which also address respiratory protection, medical removal criteria, and other topics.

On behalf of AIHA, I thank you all for the opportunity to provide our feedback on how California can protect more workers and their communities. Thank you.