NIOSH Comments to EPA

COMMENTS OF THE NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH ON THE ENVIRONMENTAL PROTECTION AGENCY'S ADVANCE NOTICE OF PROPOSED RULEMAKING ON COMPREHENSIVE REVIEW OF LEAD IN THE ENVIRONMENT UNDER TSCA

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U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
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16. Abstract (Limit: 200 words) This testimony concerns the response of NIOSH to the advance notice of proposed rulemaking published by the EPA under the Toxic Substances Control Act (TSCA). The EPA is exploring the desirability and feasibility of various approaches under TSCA to significantly reduce any unreasonable risk to human health and the environment from lead (7439921) exposure. NIOSH includes in this testimony a listing of several documents which will be of aid to the EPA in their work. Of particular value will be the NIOSH criteria document on inorganic lead published in 1978 and a recent document by OSHA and NIOSH on protecting workers exposed to lead in the construction industry, published in 1991. A current review of data on the health effects of lead to determine what new recommendations are warranted to protect workers is underway by NIOSH. NIOSH is also developing an Alert on lead poisoning among construction workers.

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The National Institute for Occupational Safety and Health (NIOSH) offers the following comments and information pertaining to inorganic lead in the environment in response to the advance notice of proposed rulemaking published by the Environmental Protection Agency (EPA) under the Toxic Substances Control Act (TSCA) [56 FR 22096]. EPA is exploring the desirability and feasibility of various approaches under TSCA to significantly reduce any unreasonable risk to human health and the environment from exposure to lead.

In Healthy People 2000 [DHHS 1991], the Public Health Service set the goal of limiting worker blood concentrations to 25 micrograms of lead per deciliter of blood (25 $\mu g/d\ell$). Consistent with this objective, NIOSH is involved in many activities that relate to assessing worker exposure to lead, the amount of lead used in industry, and other types of information concerning lead in the workplace.

Of particular value to EPA in developing its proposed standard are the NIOSH criteria document on inorganic lead [NIOSH 1978] and the recently published document by OSHA and NIOSH on protecting workers who are exposed to lead in the construction industry [OSHA/NIOSH 1991]. NIOSH is currently reviewing the data on the health effects of lead to determine what new recommendations are warranted to protect workers. We are also developing an Alert* on lead poisoning among construction workers.

Enclosure A lists materials that may be relevant to EPA in its proposed rulemaking and that NIOSH is forwarding herewith. Enclosure B is a list of ongoing NIOSH studies on lead that may be of interest to EPA.

NIOSH strongly supports EPA in its effort to reduce human exposure to lead and we offer our assistance in helping EPA develop its standard.

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*An Alert is a NIOSH document that summarizes significant new findings for preventing occupationally-related injury and disease.

REFERENCES

DHHS [1991]. Healthy people 2000: national health promotion and disease objectives. Washington, D.C.: U.S. Department of Health and Human Services, Public Health Service, DHHS Publication No. (PHS) 91-50212.

NIOSH [1978]. Criteria for a recommended standard....occupational exposure to inorganic lead - revised criteria. Cincinnati, OH: U.S. Department of Health, Education, and Welfare, Public Health Service, Center for Disease Control, National Institute for Occupational Safety and Health, DHEW (NIOSH) Publication No. 78-158.

OSHA/NIOSH [1991]. Working with lead in the construction industry. Washington, D.C.: Government Printing Office, U.S. Department of Labor, Occupational Safety and Health Administration and U.S. Department of Health and Human Services, National Institute for Occupational Safety and Health.

ENCLOSURE A

1. Interim report dated February 16, 1990, NIOSH Technical Assistance to U.S. Department of Housing and Urban Development (HUD) (HETA 90-070): HUD lead-based paint abatement project.

2. Interim report dated March 21, 1991, NIOSH Technical Assistance to HUD (HETA 90-070): HUD lead-based paint abatement demonstration project.

3. Abstract and outline of a technical presentation: Occupational hazards associated with lead-based paint abatement in public housing. Presented by Mr. Aaron Sussell at the American Industrial Hygiene Conference, May 18-24, 1991.

4. Number of state highway bridges painted containing lead paint. Draft data obtained from a survey of 47 state/territory departments of transportation conducted by the Steel Structures Painting Council, Pittsburgh, PA. Contact person: Dr. Bernard Appleman (Commercial 412/268-3326).

5. Table presenting the number of cases of elevated blood lead levels by industry reported to seven states (CA, CO, MD, NJ, NY, TX, WI) in 1988. Using overall employment data in 3-digit SIC's, rates of elevated lead levels are presented.

6. Final report of the Environmental Phase of the Bunker Hill Study (lead smelter), Kellogg, Idaho.

7. Report of a Mining Health Hazard Evaluation (MHHE 80-103) at Galena Mining, Missouri.

8. Printout from the National Occupational Hazard Survey in Mining (NOHSM) indicating exposure estimates for lead and lead oxides. Also attached is a report from the NOHSM for bulk lead dust exposure. Similar information on lead exposure in general industries can be obtained from the National Occupational Exposure Survey (NOES). This information has not been provided but if you wish to have a further explanation of the type of information that can be obtained, please contact Dr. Alice Greife, Chief, Hazard Section, Division of Surveillance, Hazard Evaluations and Field Studies, NIOSH (FTS 684-4491).

9. A computer-generated printout from the NIOSH Document Information Directory System (DIDS) listing NIOSH publications and reports on the subject of lead, blood lead levels, lead-acid batteries, lead dust, lead poisoning, lead processing, and lead smelters. If you wish to obtain copies of any of these documents, please contact Mr. Douglas Johnson, Division of Standards Development and Technology Transfer, NIOSH (FTS 684-8304).

ENCLOSURE B

1. NIOSH Technical Assistance to the Kentucky Department of Health Services, Brent-Spence Bridge, Covington (HETA 91-006). Study of lead exposures among workers repainting a bridge. Interim report available September 1991. Contact: Mr. Aaron Sussell (FTS 684-4374).

2. NIOSH Health Hazard Evaluation (HHE) at Seaway Painting Inc. (HETA 91-209). Study of lead exposure among workers repainting a water tower. Interim report available September 1991. Contact: Mr. Aaron Sussell (FTS 684-4374).

3. NIOSH Industry Wide Study (IWS) of workers exposed to lead solder in radiator repair shops. Data collection is in progress--results in mid-1992. Contact: Mr. Greg Piacitelli (FTS 684-4314).

4. NIOSH IWS of lead exposures and blood lead levels in select construction workers (e.g., bridge workers, residential abatement workers, and plumbers) and their families. Scheduled to begin in late 1991; preliminary information should be available during 1992. Contact: Dr. Marilyn Fingerhut (FTS 684-4203).