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Re: Comments regarding draft of possible amendments to 8CCR1532.1. Lead.

The California Industrial Hygiene Council (CIHC) respectfully submits the following comments regarding the latest proposed changes to Section 1532.1, Lead. The CIHC is concerned that while the Permissible Exposure Limit for lead is being reduced indicating a need to further protect against potential increased worker risk, commensurate attention is not being paid to the qualifications of personnel evaluating and monitoring the control methods used to lower this risk. Our specific comments are as follows:

8CCR5155. Airborne Contaminants. (e) Workplace Monitoring is quoted below.

(e) Workplace Monitoring.

(1) Whenever it is reasonable to suspect that employees may be exposed to concentrations of airborne contaminants in excess of levels permitted in section 5155(c), the employer shall monitor (or cause to have monitored) the work environment so that exposures to employees can be measured or calculated.

(2) When exposures to airborne contaminants are found or are expected to exceed allowable levels, measures to control such harmful exposures shall be instituted in accordance with section 5141.

(3) For the adequate protection of employees, the person supervising, directing or evaluating the monitoring and control methods shall be versed in this standard and shall be competent in industrial hygiene practice.

Note: To facilitate the detection of conditions leading to serious overexposures, the screening of the work environment by any person authorized by the employer, using appropriate measuring devices, is encouraged.

(4) All monitoring results shall be recorded and such records shall be retained in accordance with section 3204.

Please pay special attention to (e)(3), which requires that the person supervising, directing or evaluating the monitoring and control methods be versed in this standard and shall be **competent in industrial hygiene practice**.

This section of 8CCR5155 covers the many hundreds of substances with PELs listed in Section 5155.

The draft of Section 1532.1 under (j) Medical Surveillance is quoted below.

(E) The employer shall insure that all medical examinations and procedures are performed by or under the supervision of a licensed physician.

It is interesting that the draft of Section 1532.1 contains the medical quality assurance requirement noted above, but quite conspicuously omits any such assurance requirement in (d) Exposure Assessment.

The CIHC therefore, recommends adding the following paragraph to (d) Exposure Assessment.

(1) General

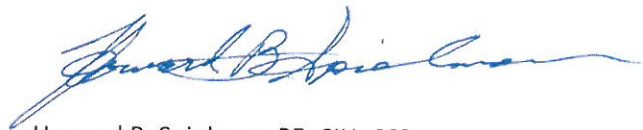
(E) The employer shall assure that the person supervising, directing or evaluating the monitoring and control methods required pursuant to Section 1532.1 be competent in industrial hygiene practice, such as a Certified Industrial Hygienist described in the Business and Professions Code, Section 20700.

Founded in 1990, the California Industrial Hygiene Council (CIHC) represents the occupational and environmental health profession in California and is affiliated with the American Industrial Hygiene Association (AIHA), a 10,000 member national organization, as well as the International Occupational Hygiene Association (IOHA), which represents the global community of Occupational Hygiene organizations in over 34 countries. Go to www.cihconline.com for further information about CIHC.

Respectfully submitted on behalf of the California Industrial Hygiene Council by:



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