



*marked 6-21-79  
via F.C./A.M.*

# Lead Industries Association, Inc.

292 Madison Avenue • New York, N. Y. 10017 • Telephone: (212) 532-2373

**FILE COPY**

Environmental Health Department

June 20, 1979

TO: All Official Members of the Lead Industries Association, Inc.  
All Members of the LIA Environmental Health Committee

FROM: Jerome F. Cole, Sc.D.

SUBJECT: State OSHA Plans -- Lead Standard

It has come to our attention that many states which have individual state plans have adopted or are in the process of adopting the OSHA Lead Standard which was promulgated on November 14, 1978 and partially stayed by the U.S. Court of Appeals for the District of Columbia on March 1, 1979. LIA has participated directly in the proceedings associated with the setting of such a Standard by California OSHA. We have not participated directly in the setting of standards by other states with state OSHA programs. We feel that it is necessary for our arguments against the Federal OSHA Standard to be put on the record in any state which may decide to adopt the OSHA Standard as stayed. The reason for this is to provide support for an eventual legal challenge of such standards should our Federal Court case result in a remand of part or all of the Federal Standard back to OSHA. Therefore, we are requesting that our member companies advise us of any states which are contemplating adoption or which have adopted an occupational standard for lead. Also, please provide us with the names and addresses of individuals to whom our comments should be directed. It would be very helpful if you could provide us with the details of any standards which may be promulgated within any of the states in which you may have operations.

Sincerely,

Jerome F. Cole, Sc.D.  
Director, Environmental Health

Dictated but not read

LIA03457

N 3725