



Lead Industries Association, Inc.

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

Environmental Health Department

July 19, 1979

TO: All Members of the Lead Industries Association, Inc.

FROM: Jerome F. Cole

SUBJECT: Possible Petition for Amendment to the Stay of the OSHA Lead Standard

It has been brought to our attention that it will be necessary for some members of the Lead Industries Association to hire a substantial number of new employees in order to meet the requirement for medical removal at 70 ug/100 g on March 1, 1980 under the unstayed portions of the new OSHA Lead Standard. LIA is considering petitioning the U.S. Court of Appeals for the District of Columbia Circuit for an amendment to the stay which would retain the requirement for medical removal at the current level of 80 ug/100 g until our appeal has been settled. While we anticipate that we will have a decision on this matter prior to March 1, 1979, we have been advised that some companies will have to begin hiring new employees by October 1, 1979 in order to assure having trained individuals in time for the March 1, 1980 deadline.

In order to assist us in determining whether or not we should move for an amendment to the stay along the above line, I would be grateful if you could fill out the attached questionnaire and return it to us as soon as possible. While it is our intention to aggregate the information received, it may be necessary to go back to individual companies for an affidavit substantiating our figures. Therefore, we ask that you provide that information which can be substantiated by you should the necessity arise.

Sincerely,

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

cc: LIA Environmental Health Committee

Enclosure



Lead Industries Association, Inc.

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

Environmental Health Department

QUESTIONNAIRE

July 19, 1979

Dear Member of Lead Industries Association, Inc.

Recognizing that the OSHA Standard for Lead requires that on March 1, 1980, any employee with a blood lead greater than 70 ug/100 g be removed from exposure and not returned until his or her blood lead is reduced below 50 ug/100 g,

- 1) How many workers do you anticipate having to hire in order to meet this requirement?

Answer: _____

- 2) When would these workers have to be hired in order to provide them with sufficient training to be put on the job by March 1, 1980?

Answer: _____

- 3) Please provide an estimate of the total cost, preferably on a monthly basis, of hiring the necessary new employees.

Answer: _____

LIA0344a

KINDLY RETURN QUESTIONNAIRE PROMPTLY TO: JEROME F. COLE, DIRECTOR,
ENVIRONMENTAL HEALTH, LEAD INDUSTRIES ASSN., INC
292 Madison Avenue, New York, N.Y. 10017

N 3723.01