

August 21, 2026

David Keeling,

Assistant Secretary of Labor for Occupational Safety and Health

Occupational Safety and Health Administration

200 Constitution Ave, N.W.

Washington, D.C. 20210

Re: Proposed Rule Lead: ID No. OSHA-2025-0022-0031

Dear Mr. Keeling;

On behalf of the National Steel Painting Contractors Associaiton ("NSPCA") we are submitting this comment to the above referenced rule changes on Lead (29 CFR 1926.62). NSPCA represents industrial painting contractors across the United States who value excellence, and their skilled workforce. NSPCA contractors pride themselves on their commitment to environmental health & safety practices that protect our workers who labor every day on structural steel painting and industrial coatings projects.

NSPCA opposes the proposed changes that would eliminate existing minimum respiratory protection requirements, including the use of a half-mask respirator with HEPA/P100 filtration during specified trigger tasks, when employee exposures exceed the PEL, and when engineering controls are insufficient to reduce exposures below the PEL. Under the proposed changes, an employer could instead determine through its respiratory protection program that respiratory protection is not required.

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Working to preserve and expand opportunities for our IUPAT signatory contractors across North America
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29 CFR 1926.62(d)(2) Protection of employees during assessment of exposure: designates specific lead related tasks as having a presumed exposure to airborne lead ranging from 50 µg/m^3 (the PEL) to over 2,500 µg/m^3.

As industrial painting contractors, most of our work falls under presumed exposure tasks, including but not limited to:

Group 1: above PEL 50 µg/m^3 but < 500 µg/m^3

- Manual scraping and sanding
- Power tool cleaning with dust collection systems
- Spray painting with lead-based paint

Group 2: 500 µg/m^3 - 2,500 µg/m^3

- Power tool cleaning without dust collection systems
- Rivet busting
- Cleanup activities where dry abrasives are used
- Movement/removal of blasting enclosures
- Vacuum-shrouded abrasive blast cleaning

Group 3: above 2,500 µg/m^3

- Dry abrasive blast cleaning
- Welding, cutting, and torch burning

NSPCA is concerned that eliminating the minimum respiratory protection under paragraph f(1)i-iv and elimination of requirements for HEPA/P100 under paragraph f(3)(i)(C) could result in inconsistent levels of worker protection across the industry and could expose workers to unnecessary inhalation hazards from airborne lead and other hazardous metals. Lead is dangerous with known health risks associated with inhalation and ingestion.

OSHA's own website (Lead - Overview | Occupational Safety and Health Administration) indicates the following:

"Lead enters the body primarily through inhalation and ingestion. Today, adults are mainly exposed to lead by breathing in lead-containing dust and fumes at work, or from hobbies that involve lead. Lead passes through the lungs into the blood where it can harm many of the body's organ systems."

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"Epidemiological and experimental studies indicate that chronic exposure resulting in blood lead levels (BLL) as low as 10 µg/dL in adults are associated with impaired kidney function, high blood pressure, nervous system and neurobehavioral effects, cognitive dysfunction later in life, and subtle cognitive effects attributed to prenatal exposure.

Chronic exposures leading to BLLs above 20 µg/dL can cause subclinical effects on cognitive functions as well as adverse effects on sperm/semen quality and delayed conception. BLLs between 20 to 40 µg/dL are associated with effects such as cognitive aging as well as deficits in visuomotor dexterity, lower reaction times and attention deficit. At BBLs above 40 µg/dL, workers begin to experience symptoms such as headache, fatigue, sleep disturbance, joint pain, myalgia, anorexia, and constipation."

Clear minimum requirements establish an important baseline for the industry and help ensure that contractors competing for the same work are held to consistent worker-protection standards. Weakening these protections also has broader economic consequences. By removing this minimum level of respiratory protection, OSHA will be increasing worker blood lead levels (BLLs). Occupational exposures that result in worker illness or injury can increase workers' compensation and insurance costs for the industry and impose additional costs on the healthcare system. Contractors that invest in appropriate respiratory protection should not be placed at a competitive disadvantage relative to contractors that reduce costs by providing a lower level of protection.

NSPCA therefore urges OSHA to retain the existing minimum respiratory protection requirements and not adopt the proposed changes that would eliminate these protections for workers in the industrial painting and coatings industry.

Sincerely,

Joye Blanscett

NSPCA, Executive Director