National Steel Painting Contractors Association

Working to preserve and expand opportunities for our IUPAT signatory contractors across North America

www.NSPCAssociation.org

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 Cadmium: ID OSHA-2025-0021-0021

Dear Mr. Keeling;

On behalf of the National Steel Painting Contractors Association ("NSPCA") we are submitting this comment to the above referenced rule changes on Cadmium (29 CFR 1926.1127). 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 in paragraph g(1)(i)-(vii) and (g)(3)(i)A-C, including the use of a half-mask respirator with HEPA/P100 filtration during specified conditions noted below. Under the proposed changes, an employer could instead determine through its respiratory protection program that respiratory protection is not required.

29 CFR 1927.1127 g(1)(i)-(vii) establishes conditions when respirators must be provided and used. Must of the conditions are directly related to the work

inherently performed by industrial painting contractors, including but not limited to:

- Periods necessary to install or implement feasible engineering and work-practice controls when employee exposure exceeds the PEL.

- Maintenance and repair activities, and brief or intermittent work operations, for which employee exposures exceed the PEL and engineering and work-practice controls are not feasible or are not required.

- Work operations in the regulated areas where work is reasonably expected to be above the PEL.

- Work operations for which the employer has implemented all feasible engineering and work-practice controls, and such controls are not sufficient to reduce employee exposures to or below the PEL.

- Wherever engineering and work practice controls are not sufficient to reduce employee exposure to or below the PEL, the employer shall supplement such controls with respiratory protection that complies with the requirements of paragraph (g) of this section and the PEL. to reduce employee exposures that exceed the PEL.

- Emergencies.

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

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

"Cadmium and its compounds are highly toxic and exposure to this metal is known to cause cancer and targets the body's cardiovascular, renal, gastrointestinal, neurological, reproductive, and respiratory systems.

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Worker exposure to cadmium can occur in all industry sectors but mostly in manufacturing and construction. …Electroplating, metal machining, welding and painting are operations associated with cadmium exposure."

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 cadmium levels (BCLs) for cadmium and may require contractors to pay for expensive and detailed medical monitoring requirements for cadmium under 29 CFR 1926.1127 such a BCL testing, 2 types of cadmium urinalysis and ongoing physical exams to monitor exposures. 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