



April 9, 2015

David Michaels, PhD, MPH  
Assistant Secretary of Labor for Occupational Safety and Health  
OSHA Docket Office – Technical Data Center – Room N-2625  
United States Department of Labor  
Occupational Safety & Health Administration  
200 Constitution Avenue, NW  
Washington, DC 20210

Re: Docket Identification #: OSHA-2014-0024;  
Updating OSHA Standards Based on National Consensus Standards; Eye and  
Face Protection

Dear Assistant Secretary Michaels;

I am writing on behalf of the 1,117 members of the Northeastern Retail Lumber Association (NRLA) in response to the Occupational Safety & Health Administration's (OSHA) proposal to update OSHA standards on eye and face protection, specifically concerning the Construction Industry Standard and the General Industry Standard. NRLA represents independent lumber and building material dealers, manufacturers, wholesalers, distributors, and other associated businesses in the Northeast, including Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont, which employ over 80,000 residents and constituents across the Northeast.

On behalf of NRLA's members, I would like to express our support for the update to include ANSI Z87.1-2010, with the key point that there be sufficient time between the final rule and implementation. NRLA members are suppliers to the construction industry and want to make sure that there is enough time for the proper ANSI Z87.1-2010 equipment to be purchased and that those that fall under the Construction Industry Standard and General Industry Standard have time to remove old PPE and purchase new PPE to put into practice.

#### **Consistency among Standards**

NRLA supports the goal of creating consistency between the Construction Industry Standard and the General Industry Standard. We understand that in the industries we serve, many employees move between the two standards on a regular basis to complete their work. Having consistency among the standards makes sense instead of having to require two different sets of eye and face PPE. Employee protection is important to our members and the customers we serve and the convenience of a single standard will serve everybody well. Consistent standards also help our members know what ANSI Z87.1-2010 qualified PPE should be stocked for those that fall under the Construction Industry Standard and the General Industry Standard.

#### **Availability of Products and Time for Transition**

While the ANSI Z87.1-2010, as well as previous versions, are available at a low cost, this does not mean that these standards are well known or adopted yet across industries. Therefore, while we support the addition of the most recent ANSI standards to the Construction Industry Standard and the General Industry Standard, we strongly believe there needs to be a transition period where associations, such as NRLA, have time to notify members of the new standards, allow them to inform their customers, who fall under those standards, of the new PPE requirements, and give ample time for those products to be ordered and placed into the workforce. This is a standard request for regulatory updates and it

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will help ensure that there is proper notification and time for employers to make sure their PPE meets the updated ANSI Z87.1-2010 before penalties are issued.

NRLA understands and appreciates the concern behind this updating of standards and looks forward to working with OSHA as this standard is updated to make sure that there is sufficient time between the final rule and implementation to allow associations, such as NRLA, the time to notify our members of the new standards and allow them to inform their customers, of the new PPE requirements. This time will be used to make sure supplies of the new PPE are available and that the industries have time to purchase and put in place the new required PPE to protect their employees. If you have any questions or if you would like to discuss this matter further, please contact Jeff Keller, Director of Legislative & Regulatory Affairs, at 518.880.6376 or by email at [jkeller@nrla.org](mailto:jkeller@nrla.org) for additional information.

Sincerely,

A handwritten signature in cursive script that reads "Joe Miles". The signature is written in black ink and is positioned above the typed name and title.

Joe Miles  
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