



April 29, 2026

Honorable Stephen Casey
Chairman, House Committee on Municipal Government & Housing
Rhode Island State House
82 Smith Street
Providence, RI 02903

**RE: H8467 – AN ACT RELATING TO STATE AFFAIRS AND GOVERNMENT –
LEAD HAZARD MITIGATION**

Dear Chairman Casey and Honorable Members of the Committee:

On behalf of the Rhode Island Manufacturers Association (“RIMA”) and our more than 1,700 member companies across the state, I appreciate the opportunity to submit testimony in opposition to H8467 – AN ACT RELATING TO STATE AFFAIRS AND GOVERNMENT – LEAD HAZARD MITIGATION

While the bill is framed primarily around housing and renovation, its scope extends broadly to **“any renovation project” involving buildings constructed prior to 1978 for housing, offices, or any other purpose**. As a result, this legislation would directly impact Rhode Island manufacturers, many of whom operate in older industrial facilities and routinely undertake maintenance, repair, and modernization projects essential to their operations.

Impact on Manufacturers

Manufacturers frequently perform renovations to:

- Upgrade production lines and equipment;
- Maintain safe and compliant facilities;
- Improve energy efficiency; and
- Expand or reconfigure workspace to remain competitive.

Because a significant portion of Rhode Island’s manufacturing base operates in buildings constructed prior to 1978, H8467 would impose sweeping new requirements on routine operational activities—not just large-scale construction projects.

These mandates would:

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- Increase project costs and delays;
- Disrupt production schedules; and
- Create additional administrative burdens for employers already complying with extensive federal safety regulations.

Existing Federal OSHA Requirements Already Apply

Work covered by H8467 is already regulated under the federal Occupational Safety and Health Administration (“OSHA”) Lead in Construction Standard, 29 CFR § 1926.62. This comprehensive standard applies to **all construction, alteration, and repair activities where employees may be exposed to lead**, including:

- Demolition or modification of structures containing lead; and
- Removal or encapsulation of lead-containing materials.

OSHA’s standard establishes strict exposure limits, requires monitoring and engineering controls, mandates medical surveillance, and includes detailed training and worker protection provisions.

Manufacturers are already required to comply with these federal standards and are subject to enforcement if they fail to do so.

Preemption and Duplication Concerns

Because Rhode Island does not operate an OSHA-approved state plan, federal OSHA standards preempt state laws that regulate occupational safety and health in areas already covered.

Two provisions of H8467 raise particular concern for RIMA members:

1. Prescriptive Training Requirement

The bill mandates a minimum of 24 hours of lead worker training for employees involved in covered renovation projects.

OSHA already requires comprehensive training but intentionally does not prescribe a fixed number of hours. Instead, it allows employers to tailor training to the specific risks and scope of a project.

For manufacturers, this flexibility is critical. A one-size-fits-all 24-hour requirement:



- May be excessive for low-risk or limited-scope maintenance work;
- May be insufficient for more complex projects; and
- Encourages a “check-the-box” approach rather than meaningful, job-specific training.

This provision is likely preempted and would impose unnecessary rigidity on employers.

2. Mandatory On-Site Lead Supervisor

The bill also requires a “lead work supervisor” to be present on site for a minimum of 40 hours per week.

OSHA already requires oversight by a **competent person** but does not mandate a specific job title or fixed on-site schedule. This allows manufacturers to structure supervision in a way that aligns with the scale and duration of the work.

For manufacturers conducting intermittent or short-duration projects, this requirement would:

- Add unnecessary labor costs;
- Delay critical maintenance and repair work; and
- Limit operational flexibility without improving safety outcomes.

As with the training provision, this requirement likely conflicts with and is preempted by federal law.

No Added Safety Benefit

RIMA strongly supports workplace safety and responsible lead hazard management. However, H8467 does not enhance worker protections beyond what is already required under OSHA’s comprehensive framework.

Instead, it:

- Duplicates existing federal requirements;
- Introduces conflicting compliance obligations; and
- Reduces employers’ ability to implement effective, site-specific safety programs.

Where violations occur, OSHA already has robust enforcement authority to ensure hazards are corrected.



Conclusion

For Rhode Island manufacturers, H8467 would impose significant operational burdens without delivering meaningful improvements in worker safety.

In summary:

- The bill's broad scope captures routine manufacturing maintenance and upgrades;
- Key provisions are likely preempted by federal OSHA law; and
- The legislation duplicates existing requirements while reducing flexibility and increasing costs.

For these reasons, RIMA respectfully urges the Committee to oppose H8467.

Thank you for your time and consideration. I would welcome the opportunity to discuss the impact of this legislation on Rhode Island's manufacturing sector.

Sincerely,

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