



PSP 2012 is the third iteration of the RCF industry's product stewardship program, first endorsed by OSHA in 2002 as PSP 2002 and again in 2007 as PSP-HTW. Like its predecessors, PSP 2012 is designed to encourage feasible and necessary control of fiber exposure in the workplace, and thereby reduce any potential risk that could be posed by such exposure. The HTIW Coalition and its member companies seek OSHA's continued support and endorsement of PSP 2012, and continuation of a cooperative program that promotes the health and safety of fiber workers nationwide.

RCF manufacturers share a mutual interest with their employees, customers, installers, trade unions and other stakeholders in ensuring that their products are manufactured and used safely. To that end, the HTIW Coalition has prepared PSP 2012 and expanded its other product stewardship efforts to continue and improve product stewardship activities that further enhance worker safety in the manufacture, installation, removal, and fabrication of RCF and apply the industry's product stewardship philosophy to the new generation of high temperature fiber insulation products.

PSP 2012 is intended to take effect immediately, seamlessly following PSP-HTW, and to remain in effect for a period of five years. The HTIW Coalition will continue to submit annual reports to OSHA and at the close of the five-year term, the Coalition will consider further voluntary programs with OSHA.

We would like to express our appreciation to you and the staff at OSHA for the support we have received during PSP-HTW and look forward to working with you as we move forward with PSP 2012.

Respectfully submitted,

HTIW Coalition

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