



JUN 19 2014

Reply to the attention of:

Dean Venturin, Ph.D.
Vice President, HTIW Coalition
2300 N Street, NW, Suite 3187
Washington, DC 20037

Dear Dr. Venturin:

It was a pleasure meeting with you in April, and you know that we continue to support the HTIW Coalition's product stewardship program, PSP 2012, for working safely with refractory ceramic fibers (RCF). We received your follow-up letter, dated May 12th, wherein you attached your consultant's report which recommended revising your PSP 2012 guidance for respiratory protection, based on his analysis of the appropriate respirator – air purifying respirator equipped with N95 instead of P100 filters - to be used by workers exposed to RCF up to 5 fibers per cubic centimeter (f/cc). This corresponds to an exposure up to ten times the Recommended Exposure Limit (REL) of 0.5 f/cc, set by the National Institute for Occupational Safety and Health (NIOSH). (Reference memo from Everest Consulting Associates, Inc., to HTIW Coalition, *N95 filtering facepiece respirators are appropriate for workers exposed to RCF*, April 29, 2014).

As you know, the criteria document (CD) developed by the NIOSH for refractory ceramic fibers recommended use of 100-series filters for exposures up to 10 times the REL.¹ Your consultant has raised questions about this NIOSH CD recommendation, and, instead, based his 95-series recommendation upon a more broadly-scoped guidance from NIOSH for mineral wool fibers, which includes manmade mineral fibers, rock wool, slag wool, and synthetic vitreous fibers.² Yet, the final sentence in your consultant's report appears to contradict his entire analysis, by concluding, "N100 is needed only in those few cases, if any, where exposures are shown reliably and consistently to be above the 0.5 f/cc." This last statement would be consistent with the NIOSH CD, as well as the PSP 2012, as currently written.

As you are considering changing your respirator recommendation in your PSP 2012 guidance to your members and customers, we recommend the HTIW first consult with NIOSH to resolve this issue. Again, we commend the efforts the HTIW Coalition is taking to ensure worker safety and health, and we look forward to your continued efforts on the PSP 2012.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Galassi".

Thomas Galassi, Director
Directorate of Enforcement Programs

¹ See NIOSH, *Occupational Exposure to Refractory Ceramic Fibers, Criteria for a Recommended Standard* (May 2006), www.cdc.gov/niosh/docs/2006-123.

² See NIOSH, *NIOSH Pocket Guide to Chemical Hazards*, DHHS (NIOSH) Publication No. 2005-149, www.cdc.gov/niosh/npg/npgd0432.html.