



JUL 31 2012

Mr. Dell C. Hadden
President
HTIW Coalition
2300 N Street NW
Room 3187
Washington, DC 20037

Dear Mr. Hadden:

On behalf of the Occupational Safety and Health Administration (OSHA), I am pleased to express our continued support for the voluntary product stewardship program (PSP) for refractory ceramic fiber (RCF) products, now known as PSP 2012. We commend the HTIW Coalition and its member companies for this program to protect workers involved in manufacturing, forming, installing and removing products containing RCF. Workers in all segments of the industry can benefit from HTIW Coalition's commitment to product stewardship and safe use of RCF products. OSHA appreciates the opportunity to review the progress of PSP 2012 in reducing worker exposures and promoting safer products and work practices, and recognizes the benefits of this partnership both for this industry and as a possible model for future collaborative efforts.

PSP 2012 represents the third iteration of the industry's voluntary product stewardship program for RCF, and builds upon previous agreements in 2002 and 2007. OSHA believes that the specific commitments the HTIW Coalition has made in developing this Program are an important step towards further improving worker protection. The 0.5 fiber/cc exposure guideline recommended in the Program, and the emphasis placed upon engineering controls and work practices detailed in the Program, and the recognition that respiratory protection is appropriate in certain operations will help to reduce exposures of the workers who handle RCF products. We remain impressed that elements of the Program are addressed to both the manufacturers and the users of RCF materials, appropriate to their ability to efficiently reduce worker risks.

Moreover, many of the provisions in PSP 2012 demonstrate the Coalition's determination to offer the best possible protections for workers. In particular, I point to the acknowledgement that "where feasible engineering controls can reduce workplace concentrations to levels below 0.5 f/cc, HTIW Coalition recognizes that it is prudent to do so," and the provision that "where workplace concentrations have been reduced to levels below 0.5 f/cc, HTIW Coalition recommends continued efforts to maintain the lowest levels consistently achieved."

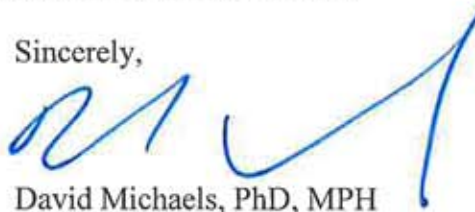
Although the success of PSP 2012 cannot be evaluated until the progress reports specified in the Program are reviewed, the actions that the Coalition and its members have committed to continue to help address the concerns that led to OSHA's identifying synthetic vitreous fibers

(SVF), including RCF, as a high priority for action in its 1995 Priority Planning Process. OSHA and its stakeholders added SVF to the 1995 list because of concern about the breadth and magnitude of worker exposures. PSP 2012 holds great promise for continuing the industry's successful efforts to reduce those exposures and increase the use of effective control measures in the RCF sector of the SVF industry. I also commend the industry for expanding the scope of its program to include all North American producers of RCF, and for applying its product stewardship principles to the new generation of fibers, including low bio-persistence wools and polycrystalline fibers.

OSHA does not, at this time, consider RCF a regulatory priority and RCF is not listed on our regulatory agenda for action. We will, however, continue to monitor developments in the scientific literature, the recommendations of expert bodies, and the effectiveness of the Program and will periodically review our approach to RCF based on this information. We also intend to work with the participants in PSP 2012 towards continuous improvement in the safe handling of RCF products, commensurate with the best available scientific information on the potential hazards.

PSP 2012 does not affect OSHA's regulatory and enforcement authorities, including performing inspections and issuing citations under the General Duty Clause, and RCF manufacturers and users are still required to comply with applicable OSHA standards. In addition, the Program provides new actions on the part of manufacturers and users that OSHA expects will be taken. It is my expectation that implementing PSP 2012 will conserve OSHA's regulatory and compliance resources, and that the periodic reports will demonstrate that companies can readily fulfill the provisions of the Program. It is with this optimism and gratitude for your efforts that OSHA reaffirms its support for this ambitious worker protection effort.

Sincerely,



David Michaels, PhD, MPH