

RCFC

Refractory Ceramic Fibers Coalition

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May 23, 2007

Mr. Edwin G. Foulke, Jr.
Assistant Secretary for
Occupational Safety and Health
U.S. Department of Labor
200 Constitution Ave, NW
Room # S-2315
Washington, D.C. 20210

Dear Assistant Secretary Foulke:

On February 11, 2002, the members of the Refractory Ceramic Fibers Coalition ("RCFC") met with Assistant Secretary Henshaw and signed a letter committing themselves to a voluntary program called PSP 2002. PSP 2002 was a five year commitment to a continuation of an already existing Product Stewardship Program. RCFC and its member companies sought OSHA's support and endorsement of PSP 2002 and establishment of a cooperative program to promote health and safety of RCF workers nationwide. During the February 11, 2002 meeting, Assistant Secretary Henshaw signed a letter supporting PSP 2002. Two years into the program, following an update meeting with RCFC's members, Assistant Secretary Henshaw sent a letter, dated August 3, 2004, to RCFC commending its product stewardship efforts.

On January 18, 2007, RCFC submitted to you RCFC's proposal for the continuation of PSP 2002, which will now be called PSP-HTW (Product Stewardship for High Temperature Wools). PSP-HTW covers essentially the same elements as PSP 2002, including continuation of both internal (RCF manufacturers) and customer (end user) monitoring at the same level as described in PSP 2002, and represents another five year commitment by the members of RCFC.

While PSP-HTW is essentially a continuation of the present program in terms of scope and level of effort, it has been modified, as appropriate, by experience and lessons learned during the past five years. The RCFC members will continue to assist customers with development and implementation of exposure reduction efforts. In addition, the RCFC members will continue to focus principally on situations involving higher exposure where intervention would provide a material improvement in exposure control; this approach has already produced appreciable improvements in customer results.

The RCFC members will continue to investigate ways to identify the "best practices" for specific engineering and process controls and will document improved handling guidelines. The first investigation of this kind during PSP 2002 yielded a document entitled: "Unit Operational Code

of Practice & Engineering Control Guidebook – Band Saws,” which was published and distributed by RCFC. In this guidebook, RCFC Industrial Hygienists were able to design and test dust collection equipment for a type of band saw typically used for RCF finishing operations. Results showed that airborne concentrations could be reduced by greater than 99 percent through the use of well-designed dust collection techniques. As such, this assessment creates a “best-practices” benchmark; RCFC recommends that end-users use this approach, or other similarly effective techniques, to control airborne RCF concentrations to levels consistently below RCFC’s Recommended Exposure Guideline (“REG”) of 0.5 f/cc.

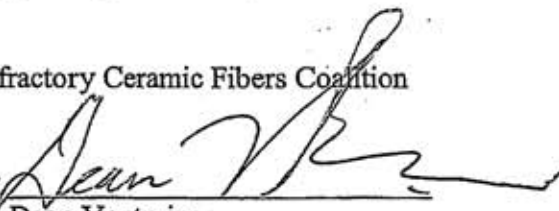
Based on an analysis of the Exposure Monitoring database maintained by Everest Consulting and the product stewardship experiences gained during the prior decade, PSP 2002 focused its “best practices” investigations on certain criteria: (1) operations with the highest relative exposures, (2) operations/equipment that are commonly used in the RCF industry, and (3) work practices that present a significant potential to improve exposure control. During the five year period of PSP 2002, RCFC published four Work Practice Guidelines (all available on RCFC’s web site): RCF Finishing Operations, RCF Blanket Cutting, RCF After-Service Removal and Batching of RCF (including a discussion of water-misting techniques). RCFC will continue to strongly encourage RCF end-users to employ these best practices techniques, or other similarly effective approaches, to ensure ambient fiber concentrations are well controlled.

We would like to express our appreciation to you and the staff of OSHA for the support we have received during PSP 2002 and look forward to continuing to work with you as we move forward with PSP-HTW.

Respectfully submitted,


Refractory Ceramic Fibers Coalition

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