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April 16, 2012

The Honorable David Michaels
Assistant Secretary of Labor for Occupational
Safety and Health
Occupational Safety and Health Administration
200 Constitution Avenue, NW
Washington, DC 20210

Re: PSP 2012-- Voluntary Product Stewardship Program for
Refractory Ceramic Fibers

Dear Assistant Secretary Michaels:

The manufacturers of refractory ceramic fibers (RCF) who comprise the membership of the HTIW Coalition remain committed to the continued protection of the health and safety of their employees and all others who use or handle RCF. Building on its prior commitment to voluntary product stewardship, the HTIW Coalition is pleased to present the most recent version of its comprehensive Product Stewardship Program (PSP), to be known as PSP 2012. The Coalition believes that PSP 2012 and the Coalition's other product stewardship efforts will continue to protect and safeguard RCF and other fiber workers while simultaneously conserving the regulatory resources of the Occupational Safety and Health Administration (OSHA).

The members of the HTIW Coalition are Thermal Ceramics Inc. and Unifrax I LLC, and associate members, ANH Refractories and Nutec Fibratex (based in Mexico). These four companies produce all of the RCF manufactured in North America. In 2011, the members changed the name of the association from the Refractory Ceramic Fibers Coalition or RCFC to HTIW Coalition, in recognition of the fact that in addition to RCF, the members produce polycrystalline aluminosilicate fibers and a new generation of high temperature insulation products of low biopersistence, including Alkaline Earth Silicate wools. These fibers of low biopersistence have chemical compositions dramatically different from RCF and the polycrystalline fibers have reduced respirability, and as described in more detail in PSP 2012, both fiber types are regarded as presenting little hazard potential.

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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President

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By: David Brooks
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