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August 19, 2014

Thomas M. Galassi
Deputy Director, Enforcement Program
Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Avenue, N.W.
Suite N-3119
Washington, DC 20210

Re: PSP 2012 and N95 Respirators

Dear Tom:

As discussed in our letter to you of May 12, 2014 and accompanying memorandum, HTIW Coalition believes that the appropriate respirator for the vast majority of potential workplace exposures to refractory ceramic fibers (RCF) is the N-95 rather than the P-100. This is generally the case except in unusual situations of exposure above 5.0 f/cc, which could occur briefly in some operations such as tearout of spent furnace linings.

In your reply of June 19, 2014 you noted that the NIOSH Criteria Document (CD) for RCF recommends use of P-100 respirators for RCF exposure scenarios. You recommended consultation with NIOSH in determining whether the N-95 recommendation is appropriate.

As we had noted, despite the P-100 recommendation, the NIOSH CD and other NIOSH materials are consistent with use of N-95 in most RCF scenarios. In a meeting with NIOSH officials on August 7, 2014, representatives of HTIW discussed this issue with NIOSH personnel. NIOSH and HTIW agreed that use of the N-95 in most RCF scenarios, as we have recommended, is appropriate.

Accordingly, this is to inform you that we have met with NIOSH officials as you suggested and all have agreed that N-95 is the appropriate respirator for the vast majority of potential RCF workplace exposures. On that basis we will continue to include the N-95 recommendation in our Product Stewardship Program.

Thank you again for your support of our continuing product stewardship efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean Venturin". The signature is written in a cursive, flowing style.

Dean Venturin
Vice President