



1025 Connecticut Avenue, N.W. Suite 1000 c/o Verdant Law Firm Washington, DC 20036 tel 202.663.9188 fax 202.354.4982
www.htiwcoalition.org

October 24, 2017

The Honorable Loren Sweatt
Acting Assistant Secretary of Labor for Occupational Safety and Health
Occupational Safety and Health Administration
200 Constitution Avenue NW Washington DC 20210

Re: PSP 2017-- Voluntary Product Stewardship Program for Refractory Ceramic
Fibers

Dear Assistant Secretary Sweatt:

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 HITW Coalition is pleased to present the most recent version of its comprehensive Product Stewardship Program (PSP) for RCF, to be known as PSP 2017. The Coalition believes that PSP 2017 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).

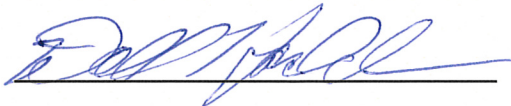
The members of the HTIW Coalition are Morgan Thermal Ceramics and Unifrax I LLC; associate members include HarbisonWalker International and Nutech. These four companies produce all of the RCF manufactured in North America. Coalition members also produce polycrystalline aluminosilicate fibers and alkaline earth silicate wools. These fibers of low biopersistence and reduced respirability have chemical compositions dramatically different from RCF. As discussed in PSP 2017, these fiber products also are subject to the product stewardship efforts of Coalition members.

PSP 2017 is the fourth iteration of the Coalition's RCF product stewardship program first endorsed by OSHA in 2002 as PSP 2002, renewed in 2007 as PSP-HTW and again in 2012 as PSP 2012. Like its predecessors, PSP 2017 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 2017, and continuation of a cooperative program that promotes the health and safety of fiber workers nationwide.

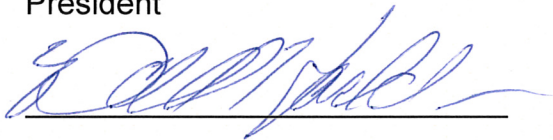
PSP 2017 is intended to take effect immediately, seamlessly following PSP-2012, and to remain in effect for a period of five years. The HTIW Coalition will submit annual reports to OSHA on implementation of PSP 2017, and at the close of the five-year term the Coalition will consider further voluntary 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 2012 and look forward to working with you as we move forward with PSP 2017.

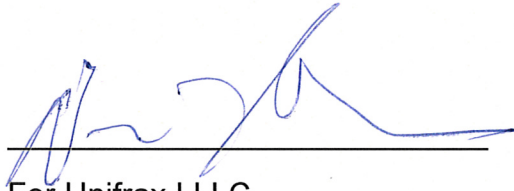
Respectfully submitted,




For HTIW Coalition
Dell Hadden
President



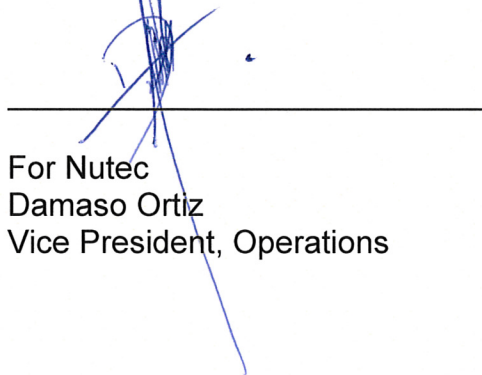
For Morgan Thermal Ceramics
Dell Hadden
Global Sales Director



For Unifrax I LLC
Dean Venturin
Director, Risk Management and Regulatory
Affairs



For HarbisonWalker International
Kristie Schussler
Product Safety Specialist
Corporate EHS



For Nutec
Damaso Ortiz
Vice President, Operations