



OCT 24 2017

Reply to the attention of:

DEP/OHE/AP/28389

Dr. Dean E. Venturin  
High Temperature Insulating Wool Coalition  
2300 N Street NW  
Room 3187  
Washington, DC 20037

Dear Dr. Venturin:

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. We commend the High Temperature Insulating Wool (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 the PSP 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.

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 recommended exposure guideline, the emphasis placed upon engineering controls and work practices, and the recognition that respiratory protection is appropriate in certain operations, helps to reduce worker exposure to RCF. We remain impressed that elements of the program address both the manufacturers and the users of RCF materials, appropriate to their ability to efficiently reduce worker risks.

Moreover, many of the provisions in the program demonstrate the HTIW Coalition's determination to offer the best possible protections for workers, as well as their commitment to employers. OSHA applauds the actions to which the HTIW Coalition has committed to continue to address the health concerns of exposures to synthetic vitreous fibers (SVF). This program holds great promise for continuing the industry's successful efforts to reduce worker exposure and increase the use of effective SVF control measures.

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 PSP. OSHA intends to periodically review our approach to RCF based on this information. This voluntary program does not affect OSHA's regulatory and enforcement authorities, including performing inspections and enforcing any violations of OSHA standards or the General Duty

Clause at RCF manufacturers and customers facilities. OSHA expects the PSP will provide continuous improvements on the part of manufacturers and users, and the periodic reports will demonstrate that companies are fulfilling the provisions of the PSP. It is with this optimism and gratitude for your efforts that OSHA reaffirms its support for this ambitious worker protection effort.

Sincerely,

A handwritten signature in black ink, appearing to read "Loren Sweatt". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Loren Sweatt  
Deputy Assistant Secretary