

U.S. Department of Labor

Assistant Secretary for
Occupational Safety and Health
Washington, D.C. 20210



SEP - 1 2006

Mr. Thomas Walters, President
Refractory Ceramic Fibers Coalition
1133 Connecticut Ave., NW
Suite 1200
Washington, DC 20036

Dear Mr. Walters:

I was recently briefed on the Product Stewardship Program (PSP) Agreement, our recent annual meeting, and the benefits both to OSHA and to your member companies as well as the down stream users of refractive ceramic fibers. I have further spoken with my colleagues on the success of the agreement over the last several years and was pleased to learn that you have completed another successful year. I have read through the report and looked at the Power Point presentation you left behind, which reinforces my impression that this is a well conceived and executed program.

I am writing you to follow up on your request for input regarding a continuation of PSP 2002 beyond the currently scheduled expiration date. OSHA is pleased with the results to date and most definitely interested in a continuation of this successful partnership. We encourage you to develop a specific proposal for our review.

In broad terms, let me suggest that the new program should cover essentially the same elements as the present PSP2002. That is, we are looking to see a continuation of the present program (e.g., training, preparation of workplace practice guides, medical monitoring, exposure monitoring in your plants and those of your customers, continued compliance with the recommended exposure guideline, benchmarking, and outreach efforts) in terms of scope and level of effort—modified, as appropriate, by experience and lessons learned. We are open to new ideas, such as (1) attempting to monitor customers of customers as suggested by NIOSH if you can devise a practical way to do this, (2) developing specific recommendations for exposure control for each of the major end-user segments and/or major jobs/tasks/operations, (3) including more visit/revisit data in your reports, and (4) various measures to encourage other customers to share stewardship experiences (perhaps through the formation of additional user groups). And, of course, the new stewardship program should continue the focus on reducing exposures to the extent feasible.