

U.S. Department of Labor

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



MAY 23 2007

Dean E. Venturin, Ph.D.
President
Refractory Ceramic Fibers Coalition
2300 N Street, NW Suite 2110
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 Protection Agreement, formerly known as PSP 2002. We commend the Refractory Ceramic Fibers Coalition (RCFC), its member companies, and their customers for their continued effort to reduce employee exposures to refractory ceramic fibers (RCF) and to protect employee safety and health. These efforts provide an example of government and the private sector's commitment to a better understanding of employee exposures and improvement of working conditions.

We have reviewed your modified program entitled: "Product Stewardship for High Temperature Wools (PSP-HTW)," sent to us with your letter dated January 18, 2007. We noted that the 2006 Program contains a new provision for the RCFC to assist those RCF users who are known to be inconsistent in implementing the program. This commitment to ensure that workplace safety and health protection is accomplished, shows RCFC's commitment to safety and health.

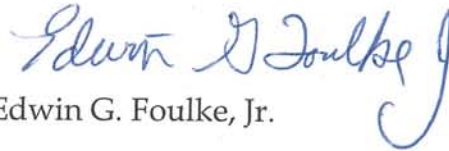
As you are aware, in May 2006, NIOSH published the document entitled: "Criteria for a Recommended Standard: Occupational Exposure to Refractory Ceramic Fibers." In this document, NIOSH recommended an exposure limit of 0.5 fibers per cubic centimeter, as well as recommendations for respiratory protection, medical monitoring, training and other control measures to reduce employee exposures to RCF. Based on our review of the PSP-HTW, we note that the provisions in this program are consistent with the NIOSH recommendations, and the fact that the RCFC has adopted, as your recommended exposure guideline, the same 0.5 fibers per cubic centimeter exposure limit. Further, the actions outlined in the program that the Refractory Ceramic Fibers Coalition has committed to in order to reduce exposures to refractory ceramic fibers will certainly help in improving employee safety and health.

As the PSP-HTW notes, OSHA retains all of its pre-existing regulatory and enforcement authority, including authority to enforce the General Duty Clause and OSHA

standards, and PSP-HTW does not make any mandatory standard voluntary. We note that NIOSH's health analysis for its basis for recommending the same limit as RCFC has a somewhat different emphasis and OSHA has reached no recent formal conclusions on this.

Again, we commend the efforts the Refractory Ceramic Fibers Coalition is taking and OSHA welcomes the opportunity to meet again with the RCFC for a formal signing ceremony.

Sincerely,

A handwritten signature in blue ink, reading "Edwin G. Foulke, Jr." with a stylized flourish at the end.

Edwin G. Foulke, Jr.