



Mr. Roger Balcerak, President
HTIW Coalition
c/o Verdant Law
1025 Connecticut Avenue, NW, Suite 1000
Washington, DC 20036

Dear Mr. Balcerak:

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 Insulation 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 your Coalition's commitment to product stewardship and safe use of RCF products. OSHA continues its support for a new 5-year PSP (PSP 2022). We look forward to reviewing your progress each year towards reducing worker exposures and promoting safer products and work practices. OSHA recognizes the benefits of this effort, 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 important steps towards further improving worker protection. I commend the HTIW Coalition members and its customers for their continued emphasis on worker training, periodic exposure monitoring, medical surveillance, and the use of engineering controls and work practices that have demonstrated high rates of compliance with the industry's recommended exposure guideline of 0.5 fibers per cubic centimeter (f/cc), and the recognition that appropriate respiratory protection is required in certain operations.

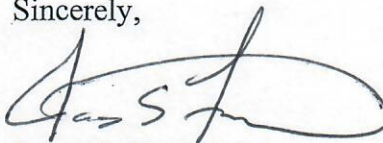
During the past two years of the COVID-19 pandemic, we understand the challenges you faced towards reaching your goal of annual exposure monitoring due to fewer numbers of workers to monitor and fewer industrial hygienists available to collect samples. But we were pleased that the sampling goal was appropriately adjusted and that a sufficient amount of internal sampling was still accomplished by the end of 2021. We remain impressed that the remaining elements of the program that addressed both the manufacturers and the users of RCF materials were maintained to appropriately reduce worker risks.

I also commend the industry for continuing to conduct research and product development towards safer fibers, such as low bio-persistence wools and polycrystalline fibers. Additionally, your continued sponsorship of epidemiological studies of the long-term effects of RCF on exposed workers is recognized. For example, your last annual report under the PSP 2017 cited the recent journal publication updating the ongoing mortality study by the *University of*

Cincinnati (UC).¹ OSHA will continue to monitor developments in the scientific literature, the recommendations of expert bodies, and the effectiveness of the PSP 2022. OSHA intends to periodically review our approach to RCF based on this information and will continue to review your annual reports.

As you know, 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 of the Occupational Safety and Health Act at RCF manufacturers and customers facilities. However, OSHA expects that the PSP 2022 will provide continuous improvements on the part of manufacturers and users, and the periodic reports should demonstrate that companies are fulfilling the provisions of the program. It is with this optimism and gratitude for your efforts that OSHA reaffirms its support for this ambitious protection effort for America's fiber workers. Please continue to coordinate with the Kimberly Stille, Director of Enforcement Programs at (202) 693-2100.

Sincerely,

A handwritten signature in black ink, appearing to read "James S. Frederick". The signature is fluid and cursive, with a large loop at the end.

James S. Frederick
Deputy Assistant Secretary

¹ LeMasters, G. K., *et al.*, Mortality of workers employed in refractory ceramic fiber manufacturing: An update. *J. Appl. Toxicol.* (<https://analyticalsciencejournals.onlinelibrary.wiley.com/doi/abs/10.1002/jat.4295>)