



December 22, 2016

Dr. David Michaels
Assistant Secretary of Labor for Occupational Safety and Health
Occupational Safety and Health Administration
US Department of Labor

RE: Comments on Standards Improvement Project-Phase IV (RIN: 1218-AC67/Docket Number: OSHA-2012-0007)

Dear Dr. Michaels:

On behalf of the American Industrial Hygiene Association® (AIHA), I submit the following comments and recommendations for your consideration in response to OSHA's proposed rulemaking entitled "Standards Improvement Project-Phase IV":

Support the proposed clarification regarding "threshold limit values" and "permissible exposure limits" in 29 CFR 1926.55, but maintain a reference link to the American Conference of Government Industrial Hygienists (ACGIH®) Threshold Limit Values of Airborne Contaminants for 1970.

Founded in 1939, AIHA is the premier association of occupational and environmental health and safety professionals. AIHA's 10,000 members play a crucial role on the front line of worker health and safety every day. Our members represent a cross-section of industry, private business, labor, government and academia.

AIHA supports OSHA's proposal to change the use of the phrase "threshold limit values" to "permissible exposure limits" in Sec. 1926.55, as we agree that it would help clarify that the exposure limits presented in that section are OSHA requirements. We do suggest, however, that OSHA maintain a reference link to the ACGIH® Threshold Limit Values of Airborne Contaminants, in addition to related publications from other organizations. AIHA further encourages and supports OSHA efforts to update the exposure limit requirements to reflect updated research findings and protect worker health.

Thank you for your consideration of AIHA's comments and recommendations. Should you have any questions or desire additional information, please contact Mark Ames, AIHA's Director of Government Relations, at mames@aiha.org or (703) 846-0730.

Respectfully,

Lawrence Sloan, CAE
Chief Executive Officer
AIHA