



March 13, 2017

OSHA Docket Office, Room N-3653
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Submitted electronically to www.regulations.gov, docket OSHA-H005C-2006-0870

Re: Occupational Exposure to Beryllium: Proposed Delay of Effective Date; 82 Fed. Reg. 12318 (March 2, 2017)

To Whom It May Concern,

The Coalition for Workplace Safety (CWS) submits this comment on the Occupational Safety and Health Administration's ("OSHA") proposed delay of the effective date of the rule "Occupational Exposure to Beryllium" ("Beryllium Final Rule") published January 9, 2017 (82 Fed. Reg. 2470). Specifically, CWS supports delaying the effective date of the Beryllium Final Rule until May 20, 2017 as proposed.

We note that the proposed rule was the product of a years-long cooperative effort between industry and labor. There is still work to be done, however, to improve the final rule as issued by OSHA. In order to continue in the same collaborative manner that has brought the rulemaking process this far, CWS agrees that additional time is warranted.

CWS members are affected by the rule given the last minute inclusion of the construction and maritime industries, and by changes in the language of the final rule that significantly broadened its application from what was originally proposed and included a series of new provisions not part of the proposed rule. In light of the on-going transition to a new administration, CWS supports OSHA's review to allow careful consideration of the legal, scientific, and policy issues on which OSHA's decisions are based.

CWS additionally notes that the affected stakeholders in this rule all continue to support the concept, and importance, of the standard developed through the cooperative effort between the industry and the USW to provide enhanced protection to employees who may be exposed to beryllium. CWS supports an extension in the effective date in the interests of improving the standard.

Submitted by,

Air Conditioning Contractors of America
American Coke and Coal Chemicals Institute
American Foundry Society
American Subcontractors Association
Associated Builders and Contractors
Associated General Contractors
Associated Wire Rope Fabricators
Copper & Brass Fabricators Council, Inc.
Flexible Packaging Association
Independent Electrical Contractors
National Association of Home Builders
National Association of Manufacturers
National Tooling and Machining Association
North American Die Casting Association
Precision Machined Products Association
Precision Metalforming Association
U.S. Chamber of Commerce