



December 15, 2009

OSHA Docket Office
OSHA Docket No. OSHA-H022K-2006-0062

By electronic submission: <http://www.regulations.gov>

To the Docket:

The undersigned members of the Coalition for Workplace Safety are writing to request an extension to the comment period for the NPRM on modifying the Hazard Communication Standard to conform to the U.N.'s Globally Harmonized System of Classification and Labeling of Chemicals (GHS) published in the Federal Register on September 30, 2009 (74 Fed. Reg. 50280, September 30, 2009). The deadline for comments is currently December 29, 2009.

This proposed regulation would implement a broad, sweeping new regulatory regime affecting a wide array of industries, and millions of employers. The actual proposed regulation is almost 130 pages with the explanatory preamble adding 140 pages of material to review. A proposal of this size and scope presents many challenges in reviewing and determining the level of impact it will have on industries and companies. Many associations are trying to find out from their members how, and to what level, they will be impacted. These challenges are further complicated by the holiday season which occupies a good portion of the comment period.

Accordingly, we request that OSHA extend the comment period 60 days to better allow associations an opportunity to work with their members in assessing the impact of this proposal and develop their comments. OSHA will be better served by commenters being able to generate more detailed and substantive comments on such a consequential regulation affecting such a wide array of workplaces.

Sincerely,

American Coke & Coal Chemicals Institute
American Foundry Society
American Trucking Associations, Inc.
Associated Builders and Contractors
Associated General Contractors
International Foodservice Distributors
Association
National Association of Home Builders

National Association of Manufacturers
National Association of Surface Finishing
National Oilseed Processors Association
National Retail Federation
Printing Industries of America
Retail Industry Leaders Association
U.S. Chamber of Commerce

The CWS is comprised of associations and employers who believe in improving workplace safety through cooperation, assistance, transparency, clarity, and accountability.