



**American Federation
of Labor and
Congress of Industrial
Organizations**

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AFL-CIO

AMERICA'S UNIONS

July 23, 2025

Amanda Wood Laihow

Assistant Secretary for Occupational Safety and Health

U.S. Department of Labor

200 Constitution Ave., N.W.

Washington, DC 20210

Re: 1,2-Dibromo-3-Chloropropane (Docket No. OSHA-2025-0019), 1,3-Butadiene (Docket No. OSHA-2025-0020), 13 Carcinogens (Docket No. OSHA-2025-0013), Acrylonitrile (Docket No. OSHA-2025-0017), Asbestos (Docket No. OSHA-2025-0024), Benzene (Docket No. OSHA-2025-0023), Cadmium (Docket No. OSHA-2025-0021), Coke Oven Emissions (Docket No. OSHA-2025-0014), Cotton Dust (Docket No. OSHA-2025-0011), Ethylene Oxide (Docket No. OSHA-2025-0018), Formaldehyde (Docket No. OSHA-2025-0026), Inorganic Arsenic (Docket No. OSHA-2025-0016), Lead (Docket No. OSHA-2025-0022), Methylene Chloride (Docket No. OSHA-2025-0012), Methylenedianiline (Docket No. OSHA-2025-0025), Vinyl Chloride (Docket No. OSHA-2025-0015)

Dear Acting Assistant Secretary Laihow,

The American Federation of Labor and Congress of Industrial Organizations (AFL-CIO) requests a 60 day extension of the comment periods and informal rulemaking hearings for the all of the Occupational Safety and Health Administration (OSHA) notices of proposed rulemakings (NPRMs) regarding the listed provisions to substance-specific chemical standards above.

Additional time is crucial for ensuring our membership in their respective workplaces is adequately represented. The AFL-CIO's membership is expansive and diverse, with many directly affected by the proposed rules. We represent 63 affiliated labor unions with nearly 15 million working people across a wide variety of industries in health care, construction, manufacturing, fire service, emergency response, transportation, education, entertainment, athletics, and many

other sectors. We have more than 50 years of experience commenting on OSHA rulemakings.

Additional time is crucial to make it through the volume of information noticed and requested by the agency. On or after July 1, 2025, OSHA alone issued dozens of deregulatory actions, many with comment deadlines of September 2, 2025, right after the nation's Labor Day holiday and summer holiday schedules. We also are reviewing and commenting on proposals from many different federal agencies under the same time frame, including three dozen deregulatory actions from other agencies in the U.S. Department of Labor, some with comment deadlines as early as July 31, 2025.

Also, without the opportunity for submission, review and comment through the Advisory Committee on Construction Safety and Health, stakeholders have not had an adequate length of time to preliminarily review and digest any regulatory actions that may be construction-related before release for public comment.

Thank you for your consideration of this important request.

Sincerely,

A handwritten signature in black ink, appearing to read "Reindel", is centered below the text "Sincerely,".

Rebecca L. Reindel, MS, MPH

Safety and Health Director