



May 31, 2024

The Honorable Douglas L. Parker
Assistant Secretary of Labor for Occupational Safety and Health
Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

RE: Comment Period Extension Request for Notice of Proposed Rulemaking, “Emergency Response Standard” (Docket No. OSHA-2007-0073, RIN 1218-AC91)

Dear Assistant Secretary Parker:

The National Demolition Association (NDA) represents nearly 500 U.S. and Canadian companies that offer standard demolition services as well as a full range of demolition-related services and products. NDA educates members on the latest advances in equipment and services, provides educational programs and tools to stay abreast of regulatory and safety matters and keeps regulators informed about issues in our industry. NDA also increases public awareness of the economic and societal benefits of demolition.

NDA writes today to request an extension to the comment period for an additional 90 days for the Occupational Safety and Health Administration’s (OSHA) Notice of Proposed Rulemaking on the Emergency Response Standard.¹ Given the complex nature of the rule, an extension of the comment period would allow stakeholders more time to thoroughly review the rule, gather sufficient data from industry sources, and provide meaningful comments to OSHA before promulgating a final rule.

Therefore, NDA requests that OSHA extend the comment period by 90 days to September 20, 2024. Thank you for your consideration of this request. For any questions, please contact NDA’s Director of Government Affairs Alex McIntyre at amcintyre@demolitionassociation.com.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Lambert", written over a light blue horizontal line.

Jeff Lambert
Chief Executive Officer
National Demolition Association (NDA)

¹ 89 Fed. Reg. 7774 (Feb. 5, 2024)