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Asbestos in General Industry (29 CFR 1910.1001); (1218-0133) Information Collection Request

Comment On: OSHA-2010-0018-0017

Asbestos in General Industry Standard; Extension of the Office of Management and Budget's (OMB) Approval of Information Collection (Paperwork) Requirements

Document: OSHA-2010-0018-0019

Anonymous Public Comment

Submitter Information

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General Comment

The proposal does not specify how collected data will be integrated into OSHA's hazard prevention and enforcement workflows; providing explicit pathways for how each required data element supports timely intervention would strengthen the necessity justification.

The burden estimate methodology appears generalized and does not account for variance across high-risk versus low-risk sectors; segmenting time and cost projections by industry profile could produce a more accurate and defensible calculation.

The draft lacks clear definitions for required reportable incidents or conditions,

which could lead to inconsistent employer interpretation; introducing standardized terminology and examples would improve clarity and data comparability.

Opportunities to reduce burden via interoperable digital systems—such as integration with existing employer safety management software—are not addressed; exploring such options could both lower compliance costs and improve data quality.

The proposed framework does not outline any feedback mechanism to inform employers of aggregated trends derived from their submissions; incorporating a reporting loop would increase utility and incentivize accurate, timely data submission.

OSHA has not indicated whether optional automated alerts or templates will be provided to assist in meeting submission deadlines; implementing these tools could streamline compliance and reduce administrative overhead.

There is no mention of measures to validate self-reported employer data before it is used in enforcement or policy development; integrating random audits or digital verification protocols would enhance reliability and safeguard against underreporting.