

Independent Miners & Associates, Inc.  
44 North Crescent Street  
Tremont, Pa. 17981

2011 FEB 22 P 3:56

February 16, 2011

MSHA  
Office of Standards, Regulations and Variances  
1100 Wilson Boulevard  
Room 2350  
Arlington, VA 22209-3939

Dear Sir:

Refer: MSHA Dust Comments RIN # 1219-AB64

We, the Independent Miners & Associates, Inc. (IMA), Anthracite Underground Miners, are submitting the following comments for your consideration on the upcoming change for the MSHA Dust Standard:

1. The Dust Regulation for Anthracite should remain the same as they are now under MSHA Regulation. They shouldn't change. Everyone wants the miners to be safe. We (IMA) realize that dust is a problem in a lot of high production Bituminous mines but in Anthracite, it really is not a big problem. This has to do with tonnage produced by the Anthracite miners. In Bituminous mines the miners work and produce an average 6,000 to 8,000 tons/day of coal and dust in these high production mines can be a serious problem. Whereas, in Anthracite underground mines the tonnage is a lot lower and there is no mechanization at the face. Anthracite miners, at an average, work & produce ten (10) tons/man/day of coal and the dust accumulation is a lot lower in the mines. Anthracite mines have never had a big problem with dust. It rarely exceeds 1.0 milligram/cubic meter. The anthracite miner rarely works a shift over seven (7) hours/day because of the physical demands of the miners job, climbing up & down the pitch with equipment/timber, setting props/ timber sets, mining & loading coal & such. The Bituminous miner is on a face maybe ten (10) to twelve (12) hours or so before his relief comes in for him. The dust could be a big problem in this case.
2. Another issue is a dry mine versus a wet mine. Most Anthracite mines are, for the most part, wet mines where they are pumping & treating groundwater/mine water. Dust in these mines is minimal. Whereas, in Bituminous a lot of the mines are dry, large production mines and dust could be a big problem at the faces, belts and loading areas.
3. The PDM Dust unit is approximately eight (8) inches in width and ten (10) inches long, weighting eight (8) pounds with a digital display on top. If worn by an Anthracite miner traveling up & down the pitch, it will only hinder his movement & the digital display can be damaged or destroyed. For, \$ 14,000.00 each, there should be a more robust and economical unit & system available for the Industry.

Thank you for your consideration on these matters.

*Alfred J. Brown*

Alfred J. Brown, President  
Independent Miners & Associates, Inc.

AB64-COMM-12