

# PUBLIC SUBMISSION

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**Docket:** MSHA-2014-0031  
 Exposure of Underground Miners to Diesel Exhaust

**Comment On:** MSHA-2014-0031-0076  
 Exposure of Underground Miners to Diesel Exhaust: Request for Information; Reopening of Rulemaking Record; Extension of Comment Period

**Document:** MSHA-2014-0031-0085  
 Comment from anonymous anonymous, NA

## Submitter Information

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## General Comment

Rescind the 2015 EPA New Source Performance Standards, entitled Carbon Pollution Standards, which set CO2 emission limits for new generators. BUT NOT FOR CALIFORNIA WILDFIRES, These standards are currently under legal challenge.

The Clean Power Plan rule to reduce CO2 emissions from existing power plants was promulgated by EPA in 2015 for effect in 2022 for existing plants, but those rules are under review by EPA AND SHOULD BE RESCINDEDOR which may initiate actions to rescind them by the courts.

concerns over whether the erosion of baseload power is compromising a reliable and resilient grid. It also asked whether wholesale energy and capacity markets are adequately compensating attributes that strengthen grid resilience and, if not, the extent to which that could affect grid reliability and resilience in the future. Indeed, a recent National Academies study indicates that there is a growing emphasis within the industry on grid resilience diverse portfolio of generation resources and well-planned transmission investments are critical to meeting regional reliability objectives. A resource portfolio approach is necessary to ensure ERS, fuel assurance, and flexibility capabilities are available. Conventional generation sources, in particular, gas from America public lands, hydropower, combustion turbines, and steam turbines, are currently the chief providers of these attributes. One of the greatest challenges to integrating VRE lies in managing its effects (variability, uncertainty, location specificity, non-synchronous generation, and low capacity factor) on grid operations and planning. Lack of long-term forecasting, for example, increases risks when scheduling planned generation outages and managing severe

weather events. There are tradeoffs between multiple desirable attributes for the electric grid. A more reliable and resilient system may be more costly than the least-cost system. Consumer life, safety and health are dependent on a reliable and resilient electric grid, making the grid a national security asset. Infrastructure hardening with Gas from Public lands , and grid recovery and restoration strategies require advanced planning and investment. In New York and Illinois, Clean Energy Standards and associated Zero Emission Credits (ZEC) for nuclear plants are being used to help maintain the economic viability and continued operations of nuclear plants, in part to help meet the states' GHG-limiting goals. New environmental regulations and rules from past administration should be rescinded especially the Mercury and Air Toxics Standards (MATS), Clean Water Act Section 316(b), and the Coal Combustion Residuals rule. Other contributing factors include more competitive markets and a variety of regional and state-level policies involving costly renewables and flawed carbon pricing. Existing National ambient air quality standards, NAAQS, for ground level ozone. Analysis suggests that the likely cost to tax payers and business, could be as high as 270 billion per year making the rule the most costly regulation ever issued by EPA.

The MATS rule was potentially the most expensive and immediate of the suite of pending regulations,