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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-2014-0031-0141

Comment from c c, NA

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General Comment

Emissions are not the mines, The immensity of greenhouse gas emissions from California wildfires has been a warning for years. the causes of catastrophic wildfire are complex of old trees, dead bushes, etc, the status quo of inaction has exacerbated present forest conditions, which now present a great risk to both communities and the environment. If managed wisely, and remove the environmental activists that has stop forest personal from cutting old growth. America's national forests can provide clean water, wildlife habitat, recreational opportunities, and abundant domestic supplies of wood products and support rural communities and thousands of jobs in the timber industry. Clearly, we must make every effort to reduce the amount of excess biomass in forests to prevent catastrophic wildfires. That means decreasing the number of trees by thinning to make them more resistant to crown fires, which will also restore the natural health and diversity of our forests. Reducing the number and severity of wildfires may be the single most important action we can take in the short-term to lower greenhouse gas emissions and fight global warming. The catastrophic wildfires that ravage California each year don't resemble the historic fires that took place in these forests for millennia. Just too many over grown bushes and trees. They exceed emissions that would have occurred in historic fires because the biomass available to burn is so much greater than it was in natural forests. Consequently wildfires, when the massive amounts of fuel in these forests burned, they released an estimated 9.5 million tons of greenhouse gases into the atmosphere just from combustion. That is an average of about 63 tons per acre. However, combustion is only part of the story because dead trees also gradually release CO2 as they decay. CO2 emissions from decay are

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generally three times greater than emissions from combustion because large quantities of wood and other plant material remain unburned after a forest fire. Combining combustion and decay emissions. Estimates that fires will emit a staggering 38 million tons of greenhouse gases into the atmosphere. Fires released one fourth of the gases during combustion, and post-fire decay will release the remainder during the next 100 years, most of it during the next 50 years. Wildfire gaseous pollutants are precursors for ozone (O₃) production. California should be required to limit wildfire NO_x emissions to reduce ozone, and to limit annual NO_x and SO₂ emissions to reduce fine particle pollution. Mercury emissions from forest fires (QHg) (in kg of mercury per year) can be estimated following a bottom-up approach by the equation: contribute substantial emissions of gases and particles to the atmosphere.

Over the years, outside the regulatory process, well-funded special interest groups have used lawsuits to force federal agencies to issue regulations that advance their priorities. At some point, this exercise of "Sue-and-Settle" and the practice of acquiescence through consent decrees or settlement agreements, which were often crafted behind closed doors and without the transparency of the rulemaking process, became all too common, paying tens of thousands of dollars in attorney's fees to these groups with which were settled. More transparent process in which impacted parties and states have a voice and creates more awareness for the general public is needed. Policies and rules should reflect common sense, consistent with statutory authorities so the public will benefit from greater un-regulatory providing economic certainty not the Environment activist .

REFORM The Equal Access to Justice Act (EAJA) . Revise Improper Payments Information Act of 2002 (IPIA). GREATER use of Regulatory Flexibility Act to assess rules effects on small businesses. BETTER USE OF REINS Act expedited congressional vote on all major or significant rules before they are effective. REFORM National Environmental Policy Act (NEPA). Wildfires need to be included in EPA issued rules in 2012 and early 2016 to control emissions of volatile organic compounds (VOCs) to address safety . These emissions can impact air quality and even climate. Daily emissions of particulate matter and numerous trace gases from wildfires mercury emissions from major natural sources and their variations with meteorological conditions is considered one of the major priority in estimating the relative contribution of major natural sources compared to industrial sources and ultimately to evaluate the mercury flux released to the atmosphere on regional and global scale. estimate the contribution of wildfires to the total mercury released to the atmosphere. An accurate estimate of carbon fluxes associated with California wildfire over the last two decades is needed to balance the global carbon budget not oil and gas or coal, or factories.