

2010 DEC 14 P 5:47

From: Dugas, Justin [mailto:JDugas@usg.com]
Sent: Tuesday, December 14, 2010 11:11 AM
To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: RIN 1219-AB71

To Whom It May Concern:

In response to your request for comment regarding MSHA's development of a proposed rule related to Safety and Health Management Programs, USG Corporation would like to offer our support. Specifically, we feel that a program similar to OSHA's VPP would be very beneficial to mining operations. The major elements of the VPP, management leadership and employee involvement, worksite analysis, hazard prevention and control, and safety and health training, would facilitate well MSHA's objective to bring miners and operators together to proactively address health and safety issues. Across our 11 OSHA Star facilities, we have seen exceptional employee involvement, which has resulted in injury reduction and proven beneficial in areas outside of safety such as quality, productivity and employee morale.

In addition to the implementation of an accreditation program such as VPP, USG supports the introduction of model programs. For many years, we have successfully utilized this concept across our corporation. We have found that model programs ease compliance requirements for individual sites while improving our ability to conduct cross company audits. We would anticipate that MSHA would find the same benefit.

USG would be willing to participate in the development of the programs described above. Please contact me if any additional information or assistance is required.

Sincerely,

Justin Dugas
Safety Manager
USG Corporation
(312) 436-5789

AB71-COMM-9