

# PUBLIC SUBMISSION

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**Docket:** MSHA-2010-0007

Lowering Miners' Exposure to Respirable Coal Mine Dust, Including Continuous Personal Dust Monitors

**Comment On:** MSHA-2010-0007-0001

Lowering Miners' Exposure to Respirable Coal Mine Dust, Including Continuous Personal Dust Monitors

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Comment from Thurman Holcomb, organization

## Submitter Information

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## General Comment

I disagree with the need to lower the current dust standard. While the number of cases of lung impairment appear to be rising in certain areas, I believe the issue can be more efficiently addressed by other means than what is proposed. The additional sampling requirements, along with utilizing new sampling devices, represents a tremendous cost to the industry when costs have already skyrocketed. The proposed rule will force many operations to close as costs are not economical.

Rather than increase sampling requirements and reduce allowable limits, simply allow operators to factor in protective equipment such as air stream helmets and respirators. Employees exposure to dust will reduce overnight as these devices are very efficient. I have seen data from experiments at U/G operations in the past where such protective equipment resulted in reducing dust exposure by 90% when comparing external samples to ones behind protective equipment.

Equipment operators are already overloaded with what they are required to wear and increasing this to include PDM's is just adding more weight to them. With cordless cap light coming into use, the PDM is already becoming obsolete. In many eastern mines now, the coal seams are thinner and thinner and wearing tracking devices, PDM's, proximity detection, radios, self rescuers, and other safety equipment is becoming a hazard in itself.

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