
From: Casper, Joseph S. <jcasper@nssga.org>
Sent: Monday, April 10, 2017 6:26 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: prox detectors comments
Attachments: proxdetect41017.docx

Please accept this attached reiteration of views on mandated use of proximity detection systems. Thank you.
Joe Casper

NSSGA NATIONAL STONE, SAND
& GRAVEL ASSOCIATION

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April 7, 2017

Office of Standards, Regulations and Variances
U.S. Mine Safety and Health Administration
201 12th Street, South
Arlington, VA 22202-5450

Dear Madame/Sir:

These comments are in response to MSHA's re-opening of the comment period regarding a possible rule mandating the use of proximity detection equipment in underground aggregates mines. While the Association appreciates MSHA's concern for workplace safety, the Association simply wishes to reiterate the view that a new rule in this area is not necessary.

By way of background, the National Stone, Sand and Gravel Association (NSSGA), is the world's largest mining association by product volume. NSSGA represents the crushed stone, sand and gravel industry, and its member companies produce more than 90 percent of the crushed stone and 70 percent of the sand and gravel consumed annually in the United States. The industry employs over 100,000 men and women.

NSSGA is committed to workplace safety and health. About a quarter century ago, the Association adopted Safety and Health guidelines. In 2003, the Association entered into the first Alliance with MSHA for education and training.

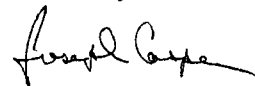
NSSGA continues to believe that no new rule mandating the use of proximity detection systems is needed. Last year, the aggregates sector saw its injury rate fall to just 1.95 injuries per 200,000 hours worked. This is the lowest level ever recorded. Furthermore, last year was the 16th consecutive year in which the rate fell from the year-earlier level.

Also, we have again reviewed summaries of all injuries incurred in the previous year in our sector. Exactly zero injuries in underground environments could have been avoided had there been proximity detection technology.

To reiterate: no new rule is needed, or justified, mandating the use of proximity detection systems in underground environments.

Thank you for your consideration of these views.

Sincerely,



Joseph Casper
Vice President, Safety Policy

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