

# 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-2014-0031-0082

Comment from anonymous anonymous, NA

## Submitter Information

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## General Comment

California Fires and Cross-State Air Pollution Rule, Wildfires can pump as much carbon dioxide into the atmosphere in just a few weeks as cars do in those areas in an entire year, a study suggests. .... flawed EPA science used a two-step process to set limits on upwind states' emissions. First, EPA determined whether a state's emissions were projected to contribute significantly to air quality problems in a downwind area (making it hard for a downwind area to attain or stay in attainment with ambient air quality standards). Second, EPA determined the amount of emission reductions that in upwind states could make without exceeding a cost threshold. But EPA only used Power Plants, and autos, and Not Wildfire air quality problems.. Wildfires should be required to limit NOx emissions to reduce ozone, and to limit annual NOx and SO2 emissions to reduce fine particle pollution. Federal agencies having primary responsibility for managing wildland fire issues--the Forest Service within the Department of Agriculture and the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), Fish and Wildlife Service (FWS), and National Park Service (NPS) within the Department of the Interior RECOMMEND that the Dept. of Interior and Secretaries of Agriculture and complete a joint tactical plan outlining the critical steps before a Fires, for a NEW cohesive strategy like underbrush treatments, including tree thinning and prescribed burning to reduce the risk of high-severity fire. Underbrush treatments have multiple benefits for forests in addition to reduction of hazardous fuels, including higher understory biodiversity and a more heterogeneous habitat mosaic... study should also demonstrates the far-reaching impact of ozone production from the fires. Wildfires are a significant direct source of atmospheric

pollutants ... In responding to A NEW report, officials from Agriculture and Interior can produce an initial tactical plan. Agencies must complete prior to implementing such a strategy, including finishing data systems needed to identify the extent, severity, and location of wildland fire threats to the nation's communities and ecosystems; updating local fire management plans to better specify the actions needed to effectively address these threats; and assessing the cost-effectiveness and affordability of options for reducing fuels in the Forest and State and Federal Lands. Executive Order 13045: Protection of Children From Environmental Health and Safety Risks