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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

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Comment from v v, NA

Submitter Information

Name: v v

Organization: NA

General Comment

Wildfires NOT Agriculture, can you imagine Past EPA wanted you to believe sand was bad thing?? What? EPA lacked actual measurements of what agriculture emits in the form of fine particulate. Agriculture is not a major emitter of this pollutant, but Wildfire is sending major PMs ozone emissions , However, nothing has been done to date to correct faulty documentation that overestimates agricultural sources. The data used to develop this inventory was based on erroneous emission factors published by CPA for cattle feed yards, feed mills, grain elevators and dust from farmers' field operations. there has never been any actual PM-2.5 emission data taken on agricultural tillage equipment using EPA approved PM-2.5 samplers. And nothing was added from wildfires emissions to the data.

Wildfires was not part of EPA issued rules in 2012 and early 2016 to control emissions of volatile organic compounds (VOCs) to address safety but These wildfire 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.

Agencies should emphasize the necessity to fully study PM-2.5 before deadlines are set and rules are developed. The science employed in developing this rule is not up to par, and concerned that farmers could bear the brunt of a bad policy based on equally bad science. We don't have the research yet to know whether rules can actually attain theme standards, how

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much it will cost the agriculture industry and the consuming public, and how much agriculture activity actually contribute to air pollution problems.

Agencies should be careful by not tipping the balance of regulation in this country too far, and force our grocers to fill market orders with food purchased from other countries that do not always meet the same safeguards and health standards as U.S. produced commodities. The agriculture community enjoys breathing clean air as much as anybody, yet doesn't want to waste money on control measures that have little or no effect on cleaning up the air of this nation.

Over the past 4 decades, there has been a doubling of the annual area burned across the North American regions which has resulted in an increase in the atmospheric emissions from fire. Fuel consumption in ecosystems with large organic deposits (peatlands and forests with deep duff layers) is highly variable, depending primarily on fuel moisture and layer thickness.

Fire in these surface organic layers are subject to more carbon to combustion and often burn in residual smoldering combustion which results in less efficient burning and higher levels of non-CO₂ trace gasses than flaming fires. New evidence indicates wildfires in the forest regions generate substantial amounts of mercury emissions (2 to 7 mg Hg-m⁻² per fire event) due to the build-up in surface material over long time periods. Estimates of NO_x, formaldehyde, and glyoxal emissions from biomass burning events derived from enhancements measured by OMI (Ozone Monitoring Instrument). Emissions from biomass burning. The location of a particular point on the ozone isopleth is defined by the ratio of the VOC and NO_x coordinates of the point, referred to as the VOC/NO_x ratio. The VOC/NO_x ratio is important in the behavior of the VOC-NO_x-O₃ system.

When local air quality administrators make decisions about which pollution control programs to implement they should consider factors such as wildfires that is caused activity or sources, and costs and benefits of implementing a set of controls on these activities.

Conditions, technology and practices, along with a number of other factors determine emissions.

government policies that are based on sound scientific evidence; emissions of identifiable atmospheric pollutants; better understanding and research on the implications of atmospheric pollution and the means of preventing it. The evidence is quite strong that conservation has been a priority for farmers and ranchers for many years.

It is an absolute necessity to allow science surrounding PM-2.5 to develop so that intelligent, reasonable and justifiable decisions should not be from faulty documentation that overestimates agricultural sources impacting of new air standard on the agricultural community.

the National Ambient Air Quality Standard (NAAQS) for particulate matter hinder farms and poor taxpayers. Agency should allow the necessary time for the agriculture community and EPA to gain a more accurate understanding of agriculture emissions by adding wildfires to understand what extent the air quality standards and the impact from industry and nature for PM-2.5 standard if any.