

PUBLIC SUBMISSION

As of: 7/18/18 1:21 PM
Received: July 10, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9471-7ea5
Comments Due: July 09, 2019
Submission Type: Web

Docket: MSHA-2018-0014
Dust Retrospective Study

Comment On: MSHA-2018-0014-0001
Retrospective Study of Respirable Coal Mine Dust Rule

Document: MSHA-2018-0014-0002
Comment from Anonymous Anonymous, NA

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General Comment

The respirable dust rule is working, for the most part, as intended. Lowering the standard from 2.0 mg/m³ to 1.5 mg/m³ and 0.5 mg/m³ for intake and Part 90 miners had very little impact, as the industry was ahead of this reduction by a fair amount.

Not nearly enough was done in the rule to combat quartz exposure. If quartz is twenty times as toxic as respirable coal dust, then why are there no real protections for miners breathing it? Why do we allow roof bolter operators down wind of continuous mining machines when we are cutting more rock than ever, and by extension, putting more silica into the air than ever?

Air velocity, water sprays, miner positioning, and ventilation methods are most of what you have to work with in controlling exposure. The most effective of these should be enshrined in the approved ventilation plan, with severe restrictions on anyone being downwind of the mining machine, whether CM or Longwall methods.

Between all the CPDM data and all inspector data available to MSHA, combined with all plan parameters, there should be ample information to figure out what works and what does not.

The CPDM is a great tool for information but thrusting upon the mining industry such a heavy requirement for a machine that is \$18,000 each, has such a short life expectancy and so prone to error was unconscionable. The machine is supposed to have a five year life cycle. Two years in and many will not last for an eight hour shift. Meanwhile, the battery used in the machine is

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discontinued and no replacement is available. The machine is also very vulnerable to sudden barometric pressure changes, as encountered when one goes through an airlock or comes up an elevator shaft that is used for intake. Cleaning hoses continues to be a problem.