
From: jhardt@everyactioncustom.com on behalf of Jerry Hardt
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Sent: Monday, October 21, 2019 12:16 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: I am writing to you today regarding a very important issue

Dear David Zatezalo,

We must prioritize the safety of all workers. Keeping them safe from harmful levels of dust is an achievable goal, and should be considered a minimum of what we can do.

First, I urge MSHA to create a stricter, separately enforceable silica dust standard. In order to protect miners, a silica standard that is separately enforceable from respirable coal dust must be promulgated. At minimum, that standard should be reduced from 100 µg/m³ to 50µg/m³.

Second, MSHA should improve enforcement of engineering, administrative, and environmental controls which includes better practices for validating whether or not samples are representative of daily dust conditions.

Last, MSHA should not place the burden of self-protection on miners and their access to respirators. The air of the environment in which the miners work should be made safe as it is often difficult or even impossible to wear respiratory equipment in the mines.

Sincerely,
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