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**From:** john.comella1@everyactioncustom.com on behalf of John Comella <john.comella1@everyactioncustom.com>  
**Sent:** Wednesday, October 23, 2019 4:30 PM  
**To:** zzMSHA-Standards - Comments to Fed Reg Group  
**Subject:** I am writing to you today regarding a very important issue

Dear David Zatezalo,

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  $\mu\text{g}/\text{m}^3$  to 50 $\mu\text{g}/\text{m}^3$ . 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.

It is important to protect our miners from silica dust in mines. They should NOT have to risk their health in order to make a living. They deserve better than that. So let's live up to our responsibility to make the restrictions and enforcement of them strong enough that they will be able to live healthy, happy lives like the rest of us.

Sincerely,  
Dr. John Comella  
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