
From: nick@everyactioncustom.com on behalf of Nicholas Hood
<nick@everyactioncustom.com>
Sent: Thursday, October 24, 2019 1:04 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 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.

The pulmonary embolism that occurs in the lungs of mine workers cannot be attributed to any other outside causes. Doctors who have seen the lungs of people who smoke multiple packs of cigarettes a day do not see anything close to what they observe in the lungs of miners with Black Lung disease. Increasing rates of Black Lung paired with the lower numbers of total people mining coal directly points to silica as being the root of the cause. As the coal seams companies mine get smaller and smaller, they have to drive through more silica laden rock which exposes to these miners to absurdly high amounts of lung harming particles. Thank you for your time and considerations.

Sincerely,
Mr. Nicholas Hood
14 E Beau St Washington, PA 15301-4702
nick@coalfieldjustice.org

AB36-COMM-23