

October 28, 2019

Sheila A. McConnell
Office of Standards, Regulations, and Variances
Mine Safety & Health Administration
201 12th Street South, Ste. 4E401
Arlington, VA 22202 Arlington, VA 22202
mccconnell.sheila.a@dol.gov

Re: MSHA Respirable Silica (Quartz) Request for Information; 84 Fed. Reg. 168 (Aug. 29, 2019); Docket ID: MSHA-2016-0013

Dear Ms. McConnell:

The National Stone, Sand and Gravel Association ("NSSGA") submits the following comment in response to the MSHA's Request for Information for Respirable Silica (Quartz) ("RFI").¹

NSSGA is a trade association representing crushed stone, sand and gravel producers (consisting of approximately 6,000 operations) throughout the United States. Crushed stone, sand and gravel contain varying levels of crystalline silica (quartz).

NSSGA believes that the current MSHA PEL² if strictly complied with and universally enforced is adequate to protect miners from the potential adverse health effects of respirable crystalline silica ("RCS").

NSSGA believes that the appropriate use of respirators in limited situations can effectively protect miners from the potential adverse health effects of RCS overexposures.

We appreciate the opportunity to provide these comments to MSHA in response to the RFI. We look forward to providing additional information in the event that MSHA moves forward with a new proposed RCS standard.

Respectfully,

NATIONAL STONE, SAND AND GRAVEL ASSOCIATION



Michael W. Johnson
President & CEO

AB36-COMM-27

¹ 84 Fed. Reg. 168, pp 45452-45456 (August 29, 2019).

² 1973 ACGIH formula referenced in 30 C.F.R. 56.5001.

Subject:

MSHA Respirable Silica (Quartz) Request for Information

From: McConnell, Sheila A - MSHA <McConnell.Sheila.A@DOL.GOV>

Sent: Monday, October 28, 2019 11:23 AM

To: Janes, Debra - MSHA <Janes.Debra@DOL.GOV>; Davis, Leah - MSHA <Davis.Leah@DOL.GOV>; Fontaine, Roslyn B - MSHA <Fontaine.Roslyn@DOL.GOV>; Aromie Noe <aromienoe@yahoo.com>

Subject: Fwd: MSHA Respirable Silica (Quartz) Request for Information

Begin forwarded message:

From: "Johnson, Mike" <mike.johnson@nssga.org>

Date: October 28, 2019 at 11:07:28 AM EDT

To: "McConnell, Sheila A - MSHA" <McConnell.Sheila.A@DOL.GOV>

Subject: MSHA Respirable Silica (Quartz) Request for Information

Please see attached document. I would appreciate a confirmation of receipt.

Thank you,

Mike

Michael W. Johnson, IOM
President & CEO