



October 28, 2019

U.S. Mine Safety and Health Administration
201 12th Street, South
Suite 4E401
Arlington, VA 22202-5452
RIN 1219-AB36 Docket No. MSHA 2016-0013

Dear Madame/Sir:

The Brick Industry Association (BIA) would like to take this opportunity to provide brief comments in response to MSHA's request for information concerning respirable silica – specifically, best practices that can improve health of miners exposed to quartz.

BIA is the national trade association representing manufacturers and distributors of clay brick and suppliers of related products and services. Since its founding in 1934, the association has been the nationally recognized authority on clay brick construction. BIA provides a broad range of programs and services that fulfill its mission of promoting and safeguarding the clay brick industry. BIA safeguards the industry through advocacy and compliance efforts at the federal and state levels; representation in all model building code forums and national standards committees; and local advocacy programs that educate local planning and elected officials about clay brick.

In response to the agency's request for information on silica, BIA wishes to express support for dissemination of best practices in controlling exposures. For instance, use of closed cab equipment with operational enviro controls (heat and air) are essential to controlling exposures during construction or mining operations. The cab enclosure must have good seals to prevent dust from entering. Also, it is essential to establish and maintain efficient radio communications. This is because any time an operator opens a door or window to communicate, the cab risks becoming filled with silica containing dust.

Additionally, utilization of a solid schedule is critical while running a water truck outdoors. In arid climates, the water evaporates quickly. Accordingly, the need for more than one truck exists. One commenting company described success in using sprinklers along roadways and adjacent to buildings. These should be set on a timer, and preparations for cold weather must be taken into consideration.

Also, vegetation is a consideration. Planting trees that can help create a wind screen to lessen the dust blown around the plant/mine site in general.

Feel free to contact me with questions at jcasper@bia.org / (703) 674-0741. Thank you.

Sincerely,

Joseph Casper
Senior Vice President, Government Relations

AB36-COMM-31

From: Joe Casper <jcasper@bia.org>
Sent: Monday, October 28, 2019 4:07 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: BIA comments on request for info on silica RIN 1219-AB36 Docket No. MSHA 2016-0013
Attachments: Scanned from a Xerox Multifunction Printer.pdf

Thank you for accepting these comments, attached, from the Brick Industry Association on silica.

Joe Casper

Joseph S. Casper
Senior Vice President, Government & Regulatory Affairs Brick Industry Association
12007 Sunrise Valley Drive
Suite 430
Reston, Virginia 20191
(703) 674-0741