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 Respirable Crystalline Silica/Quartz

Comment On: MSHA-2016-0013-0043
 Respirable Silica (Quartz); Correction

Document: MSHA-2016-0013-0057
 Comment from Teri Blanton, Daughter of deceased coal miner, from black lung.

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General Comment

MSHA should create a stricter, separately enforceable silica dust standard.

In 1995 and 1996 the National Institute of Occupational Safety and Health (NIOSH) suggested a reduced standard from 100 to 50g/m³. In 2016 the Occupational Safety and Health Administration (OSHA) established a reduced silica standard that matches the NIOSH recommendation and allows exposure to a concentration of 50g/m³ of silica over an eight-hour shift. OSHA found that a revised exposure limit of 50g/m³ substantially reduces worker risk of silicosis mortality. An exposure limit of 100 g/m³ per shift is not sufficient for protecting miner health.

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. Recent studies (Doney et al., 2019) indicate that, though dust levels are generally decreasing over the last four decades, the average percentage of quarts in dust samples as exceeded 5% - the percentage at which MSHA is required to reduce the overall dust standard for a mine - in Central Appalachia. And, it is very likely that many miners are actually exposed to even higher concentrations of dust than those reported by sampling. In interviews with miners, researchers and investigative journalists have found that dust ventilation plans are followed more closely and production diminished when MSHA inspectors are in the mines..

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.

During the June 2019 hearing in front of the House Education and Labor Committees Workforce Protections Subcommittee the leader of MSHA, David Zatezalo, said that MSHA's RFI for silica would be focused on exploring the use of personal protective equipment and respirators in order to protect miners. At the same hearing, Cecil Roberts, president of the UMWA, testified that there are situations in which it is almost impossible or very difficult to wear any kind of respirator or personal protective equipment in the mines. In addition, as stated by Reynolds et al. (2018), In general, using personal protective equipment (PPE) such as respirators is the least preferred method to control hazardous occupational exposures. To reliably reduce exposures, the correct type of respirator must be worn at the correct time and must fit and function properly. Breakdowns can occur with any of these steps. This is why engineering controls to reduce respirable dust exposures to safe levels are preferred, (p. 9).