

October 28, 2019

Sheila A. McConnell  
Office of Standards, Regulations, and Variances  
Mine Safety & Health Administration  
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Arlington, VA 22202 Arlington, VA 22202  
mcconnell.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”).<sup>1</sup>

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 PEL<sup>2</sup> 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

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

<sup>2</sup> 1973 ACGIH formula referenced in 30 C.F.R. 56.5001.