



October 28, 2019

Ms. Sheila A. McConnell
Director
Office of Standards, Regulations, and Variances
Mine Safety and Health Administration
201 12th Street South, Suite 4E401
Arlington, Virginia 22202-5452

Re: RIN 1219-AB36; Docket No. MSHA-2016-0013, Respirable Silica (Quartz)
Comments of the Industrial Minerals Association – North America

Filed via the Federal eRulemaking Portal: <http://www.regulations.gov>

Dear Ms. McConnell:

Please find attached supplemental comments of the Industrial Minerals Association – North America (IMA-NA) on MSHA’s Request for Information (RFI) on Respirable Silica (Quartz), published at 84 FR 45452 et seq. (August 29, 2019). These supplemental comments provide additional context for IMA-NA Attachment 4 to our initial comments. IMA-NA Attachment 4 addressed comments filed by the American Chemistry Council’s Crystalline Silica Panel (ACC CS Panel) on OSHA’s Proposed Rule on Occupational Exposure to Respirable Crystalline Silica, RIN 1218-AB70, Docket No. OSHA-2101-0034, published at 78 FR 56274 et seq. (September 12, 2013). Given MSHA’s “. . . interest in data and information on economically and technologically feasible best practices to protect coal and MNM [metal and nonmetal] miners’ health . . .,” 84 FR at 45456, and the agency’s request for information on costs at the public meeting it held on October 17, 2019, IMA-NA believes that MSHA will benefit from having some of the attachments that were part of the ACC Panel’s comments to OSHA included as IMA-NA Attachment 4.

To avoid confusion, these attachments retain the name attached to them by the ACC CS Panel and, thus, can be readily cross-referenced within IMA-NA Attachment 4.

IMA-NA also is submitting additional related comments the ACC CS Panel submitted in the OSHA rulemaking. These include the Post-Hearing Brief of Stuart L. Sessions and a report for the ACC CS Panel titled: Re-Estimated Benefits and Costs of OSHA’s Proposed General Industry Standard for Occupational Exposure to Crystalline Silica.

AB36-COMM-50

Thank you again for the opportunity to comment on the RFI. IMA-NA looks forward to working with MSHA on the RFI and on other issues related to occupational exposure to respirable silica (quartz).

Sincerely,

A handwritten signature in black ink that reads "Mark G. Ellis". The signature is written in a cursive style with a small dot above the 'i' in "Ellis".

Mark G. Ellis
President

Attachments:

- ACC CS Panel – Comments Attachment 8
- ACC CS Panel – Comments Attachment 9 [Environomics Report]
- ACC CS Panel – Comments Attachment 10
- ACC CS Panel – Comments Attachment 11
- ACC CS Panel – Comments Attachment 12
- ACC CS Panel – Comments Attachment 13
- ACC CS Panel – Comments Attachment 14
- Sessions Post-Hearing Brief -- Final
- Silica rule benefit-cost report -- 1-27-16 final

