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Lowering Miners' Exposure to Respirable Crystalline Silica and Improving Respiratory

Protection

Comment On: MSHA-2023-0001-1310

Lowering Miners' Exposure to Respirable Crystalline Silica and Improving Respiratory

Protection

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Comment from Miller, Richard

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General Comment

Greetings:

Please find comments (plus an attachment in the form of a power point slide) from Richard Miller regarding MSHA's proposed RIN 1219-AB36, Lowering Miners' Exposure: Respirable Crystalline Silica and Improving Respiratory Protection, as published in the Federal Register on July 13, 2023. These comments support the proposed PEL and Action Level, but urge revisions to the monitoring, medical surveillance and recordkeeping provisions.

Should MSHA require copies of the studies referenced in these comments, they are all available in the open scientific literature or on the website for the National Institute for Occupational Safety and Health.

Thank you.

Richard Miller

Attachments

Richard Miller comments on MSHA proposed respirable silica rule RIN 1219 AB36

Attachment to Comments of Richard Miller --NIOSH cost analysis of RQM for Silica Analysis 2018-Congressional meeting