



September 11, 2023

S. Aromie Noe, Director
Office of Standards, Regulations, and Variances
Mine Safety and Health Administration (MSHA)
201 12th Street South – Suite 4E401
Arlington, Virginia 22202-5450

Re: **RIN 1219-AB36; Docket No: MSHA-2023-0001**

Dear Director Noe:

The Arizona Rock Products Association (ARPA) respectfully requests your consideration for specific questions, concerns, and comments 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.

The Arizona Rock Products Association is the oldest mining related trade organization in Arizona and for 65 years has been providing representation for 60 member companies involved with the production of aggregates, asphaltic concrete, ready mix concrete, asphalt, lime products, and portland cement used in nearly every private and public construction project in Arizona. Arizona's aggregate mining industry employs approximately 8,116 people directly and 19,362 indirectly for a total of 27,478 and has an estimated direct and indirect impact on the Arizona economy of \$5.9 billion. Our producer members are combined with 78 associate members that provide related transportation, contracting, mining supplies and consulting services.

ARPA and its members are committed to safe production practices throughout Arizona and

supports the concept of reducing exposure for respirable crystalline silica, however there are sections in the proposed standard that must be reviewed and amended to allow the mining industry to successfully implement these significant changes. That said, ARPA supports the positions characterized by the comments from the Arizona Mining Association and the National Stone, Sand & Gravel Association regarding the specific sections of the proposed rule. Please see the attached comments.

If you have any questions, please feel free to contact me directly at (602) 989-3854.

Sincerely,

A handwritten signature in black ink that reads "Steve Trussell". The signature is written in a cursive, flowing style with a large initial "S".

Steve Trussell
Executive Director