

PUBLIC SUBMISSION

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Lowering Miners' Exposure to Respirable Crystalline Silica and Improving Respiratory Protection

Comment On: MSHA-2023-0001-0002

Lowering Miners' Exposure: Respirable Crystalline Silica and Improving Respiratory Protection

Document: MSHA-2023-0001-1347

Comment from Babbe, Eda

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General Comment

Instances of severe black lung disease is on the rise primarily because regulations and testing are not sufficiently limiting miners' exposure to silica. I have reviewed your Proposed Rule "Lowering Miners' Exposure to Respirable Crystalline Silica and Improving Respiratory Protection" dated 7-13-23. I believe the current version of this proposed rule is insufficient to protect miners. Below, I list three comments on the current version:

- 1) ALL miners need to be protected and during ALL phases of their work (construction and operation).
- 2) When silica levels are too high, instead of requiring miners use respirators (unrealistic given the requirements of their work), mining companies should be required to ventilate the mines and capture or eliminate dust.
- 3) To ensure compliance and stop opportunities for employers to hide evidence of dangerous conditions, specifically require periodic testing during ALL phases of mining (construction and operation), require unannounced inspections, and include consequences (fines and suspension of work) for mine operators that do not fix problems.

Thank you for your efforts to improve the standard.

Attachments

AB36-Comm-55

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