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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

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Comment from Mitrano, Erica

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General Comment

Comment on RIN 1219–AB36/Docket No. MSHA–2023–0001

As a health care provider, I urge the Mine Safety and Health Administration to take action to reduce the permissible exposure level to crystalline silica from 100 micrograms per cubic meter to 50. This long-overdue action is an important step toward protecting miners from black lung disease and other devastating – and lethal -- hazards associated with silicate exposure, including lung cancer and kidney failure.

Moreover, I urge that the use of respirators be excluded as a path to compliance for miners working in dangerous air. As a health care provider in a hospital, I have succumbed to the need to pull my mask away from my face to be heard by a patient over the din of continuous air filtration and medical alarms. Wearing such a device continuously while doing manual labor under loud and sweltering conditions is unimaginable. Miners won't comply with personal protective equipment standards because they won't be able to. The onus must be on employers to provide safe conditions, not on individual workers to meet an impossible standard.

Finally, enforcement must rest on data collected by MSHA inspectors, not on that collected by mining companies. At a recent public hearing at MSHA headquarters, Mr. Gary Ewart of the American Thoracic Society and Dr. Drew Harris of the Stone Mountain Black Lung Clinic shared patient stories of being required to sabotage air quality data collection by wrapping sensors in coffee filters or sealing them in lunch boxes, among other methods. Sadly, the history of the mining industry in this county renders such accounts more than plausible. Use honest data to evaluate air safety.

Reduce the PEL to 50 micrograms per cubic meter to protect the health and lives of some of America's most vulnerable and overlooked workers.

AB36-Comm-65

Sincerely,
Erica Mitrano, Certified Registered Nurse Practitioner
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