

From: [Chase Laine](#)
To: [zzMSHA-Standards - Comments to Fed Reg Group](#)
Subject: Tennessee Mining Association (TMA): Response to RIN 1219-AB36
Date: Thursday, August 24, 2023 3:13:04 PM
Attachments: [image001.png](#)
[TN Mining Association - Response to RIN 1219-AB36; Docket No- MSHA-2023-0001.pdf](#)

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Dear Director Noe,

Please see the attached from President Chuck Laine of TMA regarding MSHA's latest proposed Silica standard (RIN 1219-AB36; Docket NO: MSHA-2023-0001). We were advised to send the following document to this email by SilicaNPRM@dol.gov

My direct contact info is below if needed. Thank you for your time!

Sincerely,



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TMA

Tennessee Mining Association

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 Tennessee Mining Association (TMA) respectfully requests a 90-day extension to the comment period provided in 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. MSHA has requested comments on 43 specific areas within a 45-day comment period. That timeframe is insufficient to provide thoughtful and meaningful comments on all 43 questions.

The above-mentioned nationally and state-recognized mining association represents a significant number of operations and mining affiliates that will be directly impacted by the MSHA proposed rule, with a large percentage of firms representing the small business community. The proposed rule requires a thorough examination of its technical aspects, economic impact, and feasibility which is critical to fully comprehend its potential compliance obligations. Extension of the comment period will allow all stakeholders to conduct research, gather data, and engage with the firms each group represents with a focus on understanding the impacts on small businesses. This additional time will also facilitate collaboration among the agency and regulated community, promoting a more inclusive and transparent rulemaking process.



TMA

Tennessee Mining Association

The rulemaking process will greatly benefit from providing sufficient time to review each of the questions presented, as well as the proposed regulatory text, in a comprehensive manner. Again, the Tennessee Mining Association and its members who are represented in this letter kindly request that MSHA extend the comment period for 90 days and establish the comment deadline as November 24, 2023.

Respectfully submitted,

Chuck Laine, President
Tennessee Mining Association (TMA)

