



# GRC NEVADA INC.

A SUBSIDIARY OF FORTITUDE GOLD CORP.

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

Re: RIN 1219-AB36; Docket No: MSHA-2021-0001

Dear Director Noe,

GRC Nevada Inc. 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 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 other stakeholders. This additional time will also facilitate collaboration among the agency and other stakeholders, promoting a more inclusive and transparent rulemaking process.

The rulemaking process would greatly benefit from providing stakeholders with sufficient time to review and provide a comprehensive comment to each question. Again, GRC Nevada would like to request that the comment period be extended 90 days. Providing a comment deadline of December 11, 2023.

Respectfully submitted,

David Ziegler  
Health & Safety Superintendent  
GRC Nevada Inc.