



September 11, 2023

Mr. Chris Williamson  
Assistant Secretary of Labor  
Mine Safety and Health Administration  
Submitted to: REGULATIONS.GOV

Docket No. MSHA-2023-0001  
RIN: 1219-AB36

Dear Mr. Williamson:

On behalf of the American Public Health Association, a diverse community of public health professionals that champion the health of all people and communities, I write to provide



**Question 16 (Methods of Compliance)**

a) We support MSHA's proposed requirement that mine operators install, use and maintain feasible engineering and administrative controls to keep miners' exposures to respirable crystalline silica below the proposed PEL. Evidence-based strategies exist to control respirable silica dust in all mining-related tasks and operations. For coal mines, many of these strategies are

**Question 26 (Semi-annual Evaluations (proposed 60.12(d)))**

Under 30 CFR 56.5002 & 57.5002, MNM mine operators are already required to conduct exposure monitoring for respirable dust (and other contaminants) "...as frequently as necessary to determine the adequacy of control measures." This language should be integrated into 60.12(d) (or referenced) to emphasize that as mining conditions, equipment, production, or other

pursuant to 30 CFR Part 50.2(f) as “an illness or disease of a miner which may have resulted from work at a mine...”

**Question 40 (Recordkeeping Requirements)**

a) The proposed requirement for operators to maintain exposure monitoring (Section 60.12)