



July 25, 2016

Joseph A. Main
Assistant Secretary of Labor for Mine Safety and Health
Mine Safety and Health Administration
201 12th Street South, Suite 401
Arlington, VA 22202-5450

John Howard, MD
Director
The National Institute for Occupational Safety and Health
Patriots Plaza 1
395 E Street, SW, Suite 9200
Washington, DC 20201

Re: Request for Establishment of a Diesel Exhaust Health Effects Partnership and Request for Extension of Comment Period for Request for Information on Exposure of Underground Miners to Diesel Exhaust (Docket No. MSHA-2014-0031) by 90 days

Dear Mr. Secretary and Dr. Howard,

I write to you on behalf of the Industrial Minerals Association – North America (IMA-NA) Diesel Emissions Task Force. Formed approximately one year ago, the Task Force is made up of operators of underground mines producing trona, calcium carbonate, industrial sand, and wollastonite. All of the members of the Task Force use at least some diesel equipment in their mining operations and we all share a commitment to the health and safety of our employees. Some of the members of the Task Force also volunteered to participate as study mines in the Diesel Exhaust in Miners Study (DEMS) conducted by the National Institute for Occupational Safety and Health (NIOSH) and the National Cancer Institute (NCI).

The Task Force was formed to enable its member companies to learn as much as possible about the health effects of diesel exhaust in order to protect our employees' health. The Task Force also promotes and is interested in the exchange, testing, and verification of scientific information concerning the use of diesel equipment in mining operations.

As a result, the Task Force and its members have had a keen interest in the publications that have resulted from DEMS, including papers published both by the original investigators and subsequent analyses performed by independent analysts working with the DEMS data. The Task

Force also is interested in and plans to offer a response to the Mine Safety and Health Administration's (MSHA's) Request for Information on Exposure of Underground Miners to Diesel Exhaust (Docket No. MSHA-2014-0031).

The IMA-NA Diesel Emissions Task Force has begun to review the specific questions posed in the RFI. It is readily apparent that these questions are not only extraordinarily technical, but also may be best addressed by working with the manufacturers of diesel engines and suppliers of mining equipment. Engine and equipment manufacturers would be much more familiar with technical details and changes in diesel technology that were not accounted for in DEMS. In fact, these are important issues best addressed by all stakeholders working together to understand the evolving science on the potential health effects of worker exposure to diesel exhaust, as well as current technologies and current mining practices. Accordingly, we request that MSHA and NIOSH form a Diesel Exhaust Health Effects Partnership with the mining industry, including both coal and metal/nonmetal mines, diesel engine manufacturers, and representatives of organized labor. That Partnership would be best positioned to address these complex issues and reach a consensus on the path forward, informed by MSHA's fact-gathering efforts.

Relatedly, we also request that MSHA extend the comment period for the RFI by at least 90 additional days to allow the regulated industry to respond to the detailed questions MSHA has posed, and to allow time for the Partnership to begin work.

IMA-NA supports MSHA's desire to evaluate the effectiveness of MSHA's current diesel regulations to ensure they are protective of miners' health, a value that is at the core of our own operations. We look forward to working collaboratively with MSHA, NIOSH, and other stakeholders to better understand whether continued reductions in miner exposure are warranted and to identify best practices for the future to ensure our miners' safety and health.

Thank you for the opportunity to participate in this process and for your consideration of these requests.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mark G. Ellis".

Mark G. Ellis
President