

# **NATIONAL BLACK LUNG ASSOCIATION**

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2011 MAY -2 P 3:29

**Sparkle Bonds**  
Secretary

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**RE: RIN 1219 – AB64**

**COMMENT OF THE NATIONAL BLACK LUNG ASSOCIATION  
ON MSHA'S PROPOSED RULE TO LOWER  
MINERS' EXPOSURE TO RESPRABLE COAL DUST**

*AB64-COMM-37*

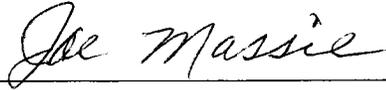
MSHA's proposed rule renews a much needed focus on the elimination of Black Lung Disease. This is a very important issue to the National Black Lung Association, a group of miners and their families who, for over forty years have been working for justice for victims of Black Lung. For many years the NBLA has urged better control of dust and reduced levels of exposure to dust to protect miners from Black Lung. We strongly support MSHA's proposals to eliminate Black Lung Disease..

MSHA should implement the rule as speedily as possible. The 1995 NIOSH Criteria Document recommended a reduction in the allowable amount of respirable dust to 1 mg/cubic meter as called for in the rule. In the 16 years since NIOSH published its recommended standard there has been an alarming increased incidence of coal workers' pneumoconiosis among coal miners in eastern Kentucky and southwestern Virginia. A generation of miners have had to work in dusty conditions where their health was endangered because no action was taken in response to the NIOSH document. Who knows how many of those miners are disabled and crippled today because not enough was done by the coal industry to protect its workers and by the government agency entrusted with the responsibility to protect the miners?

Miners who have disabling Black Lung are short of breath and unable to enjoy even simple activities, such as taking a walk or playing with their children or grandchildren. They cannot do simple chores such as cutting the grass. Black lung has ruined their health. It has changed the lives of their families. They cannot work and their ability to support their families is wiped out. They are now dependent on compensation and disability benefits to get by. Their income is half what they had earned. Black Lung has deprived them of a normal and productive life.

The 1969 Coal Mine Act was intended to eliminate black lung by reducing the amount of dust that miners breathed. The law stated that the government should establish limits reducing the amount of dust in the mines to a level of personal exposure which will prevent new incidences of respiratory disease and the further development of such disease. The law stated that it intended to ensure that the working conditions in coal mines were sufficiently free of dust in the mine atmosphere to permit each miner the opportunity to work during the period of his entire adult working life without incurring any disability from 'black lung' disease or any other occupation-related disease. We have not succeeded in this effort.

The National Black Lung Association is encouraged that MSHA has a renewed dedication to eliminating black lung. Miners are entitled to work in a safe and healthy work environment. Miners should be able to work in an environment where they are not at risk for developing an incurable disease.

A handwritten signature in cursive script that reads "Joe Massie". The signature is written in black ink and is positioned above a horizontal line.

**Joe Massie, President**