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Executive Director

June 12, 2002

Mine Safety and Health Administration  
Office of Standards, Regulations, and Variances  
Room 631  
4015 Wilson Boulevard  
Arlington, VA 22203-1984

Re: ANPR – Measuring and Controlling Asbestos Exposure  
Federal Register March 29, 2002 (Vol. 67, Number 61) (Page  
15134-15138) 30 CFR Parts 58 and 72, RIN 1219-AB24

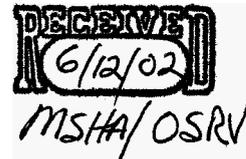
Via e-mail: [comments@msha.gov](mailto:comments@msha.gov)

Dear Sir/Madam:

The American Industrial Hygiene Association (AIHA) expresses its appreciation to the Mine Safety and Health Administration (MSHA) for the opportunity to comment on the advance notice of proposed rulemaking – Measuring and Controlling Asbestos Exposure. Announcement of the proposed rule was published in the *Federal Register* Vol. 67, No. 61, March 29, 2002, page 15134.

As the world's largest association of occupational and environmental health professionals, AIHA members serve on the front line of worker health and safety. AIHA members, as well as employees and employers, rely on federal and state requirements to improve the health and safety of workers.

AIHA has reviewed the advance notice of proposed rulemaking and applauds MSHA in its continuing efforts to protect miners when they are working in environments where asbestos is present. All parties are aware that exposure to high levels of asbestos can cause asbestosis, mesothelioma and lung cancer.



AB24-Comm-10

**AIHA**

*Your Essential Connection:*

*Advancing Occupational and Environmental Health  
and Safety Globally*

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AIHA would like to provide the following comments on the advance notice of proposed rulemaking:

a AIHA welcomes and supports the initiative to lower the Permissible Exposure Limit (PEL) for miners to the current OSHA level. If the current OSHA PEL is appropriate for general industry workers it should also be appropriate for miners.

a AIHA agrees that MSHA should consider using EPA AHERA requirements for workers and require that they be provided with clean clothes and showers following each shift in the containment area.

In conclusion, AIHA supports MSHA efforts to increase protection to miners working in environments where asbestos is present. We believe consideration of our comments will add to your efforts.

Again, AIHA would like to thank the Mine Safety and Health Administration for the opportunity to provide comments on this advance notice of proposed rulemaking. In providing these comments and suggestions, AIHA is hopeful that the final rule will meet the goals of MSHA and continue to protect the health and safety of miners and others.

If we can be of any further assistance, please contact me.

Sincerely,

*(Signature)*

*Gayla J. McCluskey*

Gayla J. McCluskey, CIH, CSP, ROH, QEP  
President

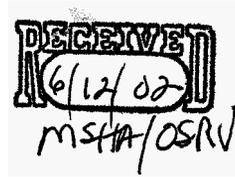
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cc: AIHA Board of Directors  
Richard Strano, AIHA Executive Director  
Steven Davis, AIHA Deputy Executive Director

**Sexauer Edward J.**

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**From:** Aaron Tripler [ATRIPPLER@aiha.org]  
**Sent:** Wednesday, June 12, 2002 8:05 AM  
**To:** comments@msha.gov  
**Subject:** AIHA Comments on ANPR pertaining to Asbestos



MSHA-Asbestos-06-12-02.doc

Attached are official comments to MSHA from the American Industrial Hygiene Association on the advance notice of proposed rulemaking - Measuring and Controlling Asbestos Exposure, Federal Register March 29, 2002, Page 15134.

Should you have any questions, please contact me.

Thank you for your consideration.

Aaron K. Tripler  
Director, Government Affairs  
American Industrial Hygiene Association  
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