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Gentlemen

This comment regards CFR 70.100. Revision of this regulation should include Personal Protective Gear (PPG) as administrative control for the operator to reduce hazards associated with exposure to respirable dust.

In the instance where an operator implements a administrative control, providing and requiring PPG air purifying respirators to be worn then monitoring respirable dust concentrations would be done in the atmosphere that the miner breathes. Monitor the air the miner breathes after it passes thru the purifying respirator.

As an example, 3M AS600 air stream helmets are recognized by OSHA and certified by NIOSH as effective for protection against respirable dust. The air stream helmet Assigned Protection Factor for a powered air purifying respirator, full facepiece, is 1,000. There is no doubt that a administrative control to implement a policy requiring air stream helmets to be worn would reduce hazards associated with exposure to respirable dust.

Revision of MSHA standards to accept PPG will result in advanced technology to reduce exposure of miners to respirable dust hazards. At present there is no incentive for operators or manufacturers to develop new technology. The existing regulations do not recognize any administrative control for reducing respirable dust hazards. If compliance with respirable dust regulations can only be accomplished by maintaining respirable dust concentrations in the mine atmosphere then new PPG technology will not be developed.

Revision of the respirable dust regulations to include appropriate PPG and to monitor the air that a miner breathes after it passes thru the PPG will not increase exposure of miners to hazards associated with respirable dust.

Sincerely,



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Chief Engineer

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