
From: David Wilder <dlw@questenergycorp.com>
Sent: Friday, November 24, 2017 3:22 PM
To: zzMSHA-OSRVRegulatoryReform
Subject: Dust Regulations

I feel that the new dust regulations place a burdensome function for all person that have to maintain and run dust pumps. Running 15 consecutive entity samples that are all good passing samples per quarter ensures that dust is run every day in the mine. A represented number of samples, such as 5 per entity would be plenty per quarter. Dust samples went from 60 per quarter to almost 300 per quarter now. The CPDM dust pumps that the industry must use are very un-reliable and many samples are lost due to temperature, malfunctions of the pump, tilting of the pump and dozens of other codes that reject the dust sample, some of which are not even explained. MSHA does not have to use the same CPDM pumps and they use the old ELF pumps, of which very seldom have problems. MSHA also does not have to run 15 consecutive samples on any entity that they run. If samples are run on Saturday night, that sample result is required to be submitted within 24 hours, which requires that person to work on Sundays to assure that the sample is submitted to MSHA on line. I am certainly on board with stopping Black Lung, however the regulation need to be re-evaluated with input from the industry as to how often the samples are ran and as to the procedures to be followed when submitting samples and the problems that are encountered. Please re- evaluate the dust regulations and provide for a more meaningful result that we can all live with.

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