

From: [Franklin, Charles](#)
To: [zzMSHA-OSRVRegulatoryReform](#)
Cc: [Robuck, Stephen](#); [Silvey, Patricia - MSHA](#)
Subject: Recommendations for MSHA Regulatory Reform Effort
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Attachments: [image001.png](#)
[PCA Recommendations for MSHA Regulatory Reform \(12-31-2018\)-coverletterandcommenttable.pdf](#)

Dear Ms. McConnell

The Portland Cement Association (PCA) appreciates the opportunity to provide recommendations for MSHA regulations and guidance deserving repeal, replacement, or modification pursuant to President Trump's Executive Order (E.O.) 13777, issued on February 24, 2017.

PCA, founded in 1916, is the premier policy, research, education, and market intelligence organization serving America's cement manufactures. The PCA's members represent 93 percent of the United States' cement production capacity and have facilities in all 50 states. Cement and concrete product manufacturing, directly and indirectly, employs approximately 600,000 people in our country, and our collective industries contribute over \$100 billion on our economy. Portland cement is the fundamental ingredient in concrete. The Association promotes safety, sustainability, and innovation in all aspects of construction fostering continued improvement in cement manufacturing and distribution and promotes economic growth and sound infrastructure investment.

In these initial comments, PCA is recommending 33 targeted fixes to current MSHA regulations to address ambiguous, duplicative, or otherwise burdensome requirements that provide little to no health or safety benefits. In addition to the comments provided below, PCA further supports the recommendations provided by the following commenters:

- Buzzi Unicem USA, submitted December 6, 2018 (COM 077-1);
- National Sand Stone and Gravel Association (COM 060-1); and
- National Lime Association (COM 035-1).

We thank you again for the opportunity to comment and look forward to further conversation on these and other regulatory reform opportunities that can increase MSHA's effectiveness in carrying out its health and safety mission. Please do not hesitate to contact me at 202-719-1977 or cfranklin@cement.org if you would like to discuss these comments further.



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