
From: Connolly, Una [mailto:uconnolly@nssga.org]
Sent: Thursday, September 18, 2008 12:38 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: RIN 1219-AB41

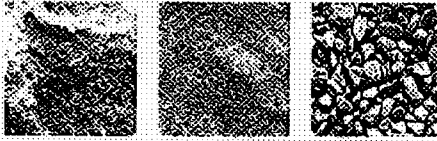
Úna Connolly, REM
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AB41-COMM-12

NATIONAL STONE, SAND & GRAVEL ASSOCIATION



Natural building blocks for quality of life

September 17, 2008

Patricia W. Silvey
Director, Office of Standards, Regulations & Variances
U.S. Department of Labor
Mine Safety and Health Administration
1100 Wilson Boulevard
Arlington, VA 22209-3939

RE: Notice of Proposed Rulemaking - Alcohol and Drug Free Mines
Published September 8, 2008
Docket, MSHA-2008-0011
RIN 1219-AB41

Dear Ms. Silvey:

The National Stone, Sand & Gravel Association (NSSGA) respectfully requests an extension of the comment period by 30-60 days. Due to the broad nature of the proposed rule, more time is necessary to adequately review and analyze the potential impacts. We also request that a public hearing be held to discuss and convey concerns regarding this proposed rule.

During the preliminary review of the proposed rule, we have noted a number of problematic areas, including a lessening of safety for miners; conflicts with current company and state programs; confusion on the types of testing in comparison to other Agencies; as well as the potential inadequacy of the number of laboratories and Medical Review Officers (MRO) available to review laboratory tests.

Based near the nation's capital, NSSGA is the world's largest mining association by product volume. Its member companies represent more than 90 percent of the crushed stone and 70 percent of the sand and gravel produced annually in the U.S. and approximately 118,000 working men and women in the aggregates industry. During 2006, a total of about 2.95 billion metric tons of crushed stone, sand and gravel, valued at \$21 billion, were produced and sold in the United States.

If you have any questions, please don't hesitate to contact me at 703-526-1064.

Sincerely,

Handwritten signature of Una Connolly in cursive script.

Una Connolly
Associate Vice President
Occupational and Environmental Health

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