Thoughts from PCA for our consideration as we develop a plan to approach our upcoming meeting with MSHA.

Michelle, per your request, I went back through the MSHA presentations, reports and correspondence to find their priority concerns that might be covered in the first technical meeting between MSHA and CKRC.  I only listed four items because some of them are complex and have several parts.  The other remaining concerns can be covered in later meetings (Mike Davis, District Manager of MSHA’s South Central District recommends multiple meetings).  I have also included some recommendations at the end of this e-mail for how to respond or address the MSHA concerns.

1. One of the main points contained in the Troy Hart (MSHA Industrial Hygienist) and Michael Hockenberry (MSHA Fire Protection Engineer) presentations from the March, 2018 South Central Mine Safety and Health Conference is:  Alternate Fuels (AF) facilities have had a higher rate of serious incidents (ie explosions, fires and spills) than other cement manufacturing facilities.
2. One of the main points from the presentation MSHA delivered to PCA at the June 14, 2018 meeting was:  Operators should conduct a formal Process Hazard Analysis (PHA) of the AF Process.  With the results of the PHA, AF operators should ensure that practical Engineering controls are installed in safe locations to eliminate or mitigate the potential hazards, contact or respiratory.
3. In conversations with Michael Davis, MSHA’s South Central District Manager, his impression is that fuels change from week to week and that AF facility operators don’t always know the exact recipe of chemicals and contaminants going into the process.   Somewhat relatedly, MSHA representatives claim that AF operators are lacking adequate warning information, labels and signage for employees, contractors and visitors.  For the visitors, Troy Hart’s presentation further recommended that AF facility operators provide MSHA, Emergency Management and Medical providers with detailed chemical hazard information so they can protect themselves and render appropriate services to AF facilities.
4. Another point from the Troy Hart presentation and follow-up conversations is:  While AF operators have done some personal or Industrial Hygiene (IH) monitoring at AF facilities, they need to complete the full range of monitoring or sampling.  This monitoring should identify the organic compounds, gaseous emissions and dust/particulate emissions in the AF workplace.

Below are some of the responses that could be prepared and presented to MSHA during the upcoming meeting.  The numbered responses correspond to the concerns or issues listed above:

1. Are there statistics available that would refute the Troy Hart and Michael Hockenberry conclusion in #1 above?  Another thought would be to present Engineering and Design information which shows these facilities have more protections and safeguards (and are more robust) than an average cement manufacturing facility.  The group may also want to present information which shows they are prepared to address incidents (RCRA Contingency Plans, incident preparedness and emergency response plans)?
2. For #2, are there PHA’s or other risk assessments like Failure Mode and Effects Analyses (ie FMEA’s) of the AF process available that could be showcased at the meeting?  Are there examples of safety assessments being used to design and/or improve controls systems? Lastly, you could present a couple examples of key Engineering controls that are used to eliminate or mitigate workplace hazards.
3. One thought on #3 would be to show the AF facility RCRA Waste Sampling Plans.  Also, show MSHA the identification of the wastes received and how loads can be rejected if they do not match waste profiles already established by the generator.  You may even want to show MSHA the number of loads rejected (in the last year or longer) because of the screening.  You can also give examples of proper waste and materials warnings, labels and signage.
4. Show MSHA examples of proper IH monitoring and corresponding results at AF facilities.  If these examples included results of organic scans, gaseous pollutants (that are breakdown products of the wastes processed) and particle identification, they would be of greater interest to MSHA.

Please let me know if you have any questions or comments.

Best regards,

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