**MSHA NEXT STEPS**

Based on the information gained out of recent meeting at HQ, Discussions/Experiences at the District levels, and in conversations at the Mine Academy Conference, what should CKRC do next?

**Questions out of HQ Meeting**

* How do we know that respirator cartridges are proper for the range of chemical and changed when spent?
* Lots of analysis for BTU and fuel quality, but what about for chemicals with TLVs?
* Need more short term monitoring to know respirator protection requirments.
* What about respirators for truck drivers who stay in their truck while unloading?
* Most handheld organic test units are combustion devices. How do we ensure they are not poisoned by contaminants in the air?
* glove breakthrough times;
* concern about the potential problems associated when processing these wastes into the systems;
* calibration/bump test standard practices; and
* training.

Monique Spruill, the M/NM Health Chief, suggested that operators may have only an 80/20 knowledge of the wastes we are taking. When questioned, she was unable to clearly articulate the basis for this concern. Participants emphasized that they are required to understand the nature of all wastes accepted for use at the kiln. MSHA said it is important to them to increase the safety and knowledge of their inspectors. MSHA is interested in better understanding how its inspectors can know the proper PPE to bring before they come to the site for an inspection. Monique suggested that one potential next step might be to explore lessons learned from past operations, drawing from both operator and MSHA experiences. She also suggested that in the future, inspectors would be trained chemists or industrial hygienists. She is frustrated that currently, many of the inspectors sent to WDF sites are not properly trained. She also suggested that we should be assessing exposure to benzene for first responders. She expressed an interest in dust monitoring, including monitoring of enclosed spaces for interaction with diesel exhaust and WDF.

**District Level**

*North Central District PCA meeting* -- “hazardous materials” did come up. Issues raised were the same we have previously heard including concern about what the materials are, level of certainty provided by manifests, and concerns for safety of workers and inspectors.

*Mine Academy Conference --*During a conference at the mine academy last week an academy trainers raised the issue as well. PCA Staff said it definitely seems like an issue MSHA is focusing on nation-wide. The trainer touched on a key concern is knowing exactly what the materials are so both workers and inspectors can be adequately protected.  According the mining academy trainer, they have not yet set a plan or had anything concrete come down from HQ yet, but they are waiting on it.

*South Central and MSHA in general themes are that there is:*

* Misplaced emphasis by Industry on RCRA / environmental compliance rather than safety and health
* Operators do not know what they’re burning
* Inadequate monitoring is being conducted to protect employee exposure
* Insufficient communication of hazards to employees
* Inadequate PPE