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Refuge Alternatives for Underground Coal Mines- Limited reopening of the record.

Comment On: MSHA-2013-0032-0011

Refuge Alternatives for Underground Coal Mines

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Comment from John Gallick, NA

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General Comment

See attached file(s)

Attachments

Comments on RIN 1219-AB84

1219-AB84-COMM-3

Alpha Natural Resources on behalf of its affiliates is submitting the following comments concerning the re-opening of the Refuge Chamber rule. As you know Alpha Natural Resources has affiliates in five states and operates a significant percentage of the underground mines in the United States. Before turning to the actual question proposed in the limited re-opening of the record, I want to urge the Agency to make certain that any changes in training rules are performance driven. We know that the training systems are changing rapidly and we want to be able to use these new technologies where and when we can. As you know Alpha recently opened its Running Right Leadership Academy (RRLA). Included in the RRLA is a lab where the hands-on training and expectation training can occur.

The U.S. Court of Appeals for the District of Columbia Circuit remanded a training provision in the Refuge Alternatives rule, directing MSHA to explain the basis for requiring motor task (hands-on), decision-making, and expectations training annually rather than quarterly or to reopen the record and allow public comment.

The re-opening of the record notice states that; " Motor task (hands-on) training consists of performing necessary activities associated with deploying and using a refuge alternative and its components. Decision-making training consists of learning when it is appropriate to use refuge alternatives. Expectations training consist of anticipating and experiencing the conditions that might be encountered during use of a refuge alternative (e.g., high heat and humidity, confined space)." My comments address alternative methods for providing hands-on training and some pieces of expectation training each quarter without resorting to a full scale deployment of the refuge chamber.

First some background information from Alpha's affiliates training in the ERP. The annual expectations training require the deployment and use of the shelter and its use by each group of workers. This exercise takes each crew (10 to 15 people) about 30 to 45 minutes to deploy and enter a shelter. This does not include the time to set-up the training shelter and to re-pack it for the next training group. Our experience is that to schedule and then conduct expectations training with shelters requires 2 to 5 days for a small mine; 7 to 10 days for a moderate sized mine and three to four weeks at a larger mine. This is the reality of re-packing the units after each deployment and getting ready to train each crew and / or group of workers. Quarterly training will place a burden on the operations and require training models be

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stationed at most mines as sharing of training models will be difficult with quarterly schedules. This is only one piece of the Emergency Preparedness training required by the rules. All workers travel escapeways four times per year. All workers practice donning Self Contained Self Rescuers (SCSR) and transferring units each quarter as well. Annually all workers are subjected to SCSR training and travel in a smoke or limited visibility situation. Each quarter varied scenarios are a part of the emergency training.

In the initial pre-amble MSHA stated: "Based on MSHA's knowledge and experience, MSHA believes that quarterly training and drills together with annual expectations training is a reasonable approach to instill the discipline, confidence, and skills necessary to survive a mine emergency. This final rule improves miner training and helps assure that underground coal miners know when to use a refuge alternative and know how to deploy and use the various components to sustain life until rescued." (FR /Vol. 73, No. 251 December 31, 2008 page 80680) I believe MSHA was correct when this was written in 2008 and is correct today. While this thought and plan for training is correct, there are things that can be done to make the training more effective without resorting to the full deployment of chambers each quarter. There are two types of training skills that are of concern to this proposal: motor task training and expectations training. It is my opinion that the goal for quality training each quarter can be accomplished without requiring actual deployment of the refuge chamber each quarter. "Motor task (hands-on) training consists of performing necessary activities associated with deploying and using a refuge alternative and its components." To meet the needs of motor training other less burdensome training can be conducted. For example, I would propose that rather than the full scale deployment of refuge chambers each quarter, a panel mock-up of the valve and door arrangements of the refuge chamber in use at the mine can be developed. The design would be a realistic mock-up of the actual doors and valves that need to be turned on and understood by the workers. Three of the four quarters each year training can consist of the decision-making training that is presently conducted and then video and hands-on training of the mock-up door latches and valves needed to deploy the unit. The mock unit would be the actual valve and door configurations of the units without the tent deployment. Each employee can actually do the hands-on of the mock-up panel and be questioned by the instructor to assure the worker has the knowledge and skills to deploy the units if needed. This training would be hands-on and instructor driven. I believe that this training would be effective and meet the concern expressed in this limited reopening

of the record: that the worker to be prepared to properly deploy a refuge alternative. Hands-on training using a mock-up of the doors and valves of the refuge chamber provides both motor skills and expectation training other than the entrance into the actual chamber.

I would propose that the actual entry into the tent would continue to be a part of the annual training required under 30 CFR 75.1504 (c) (3).

Thank you for the opportunity to comment.

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