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Examinations of Working Places in Metal and Nonmetal Mines. 30 CFR Parts 56 and 57

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Examinations of Working Places in Metal and Nonmetal Mines

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Comment from woody sanderson, NA

Submitter Information

Name: woody sanderson

Address:

213 kaolin road

Aiken, SC, 29801

Email: woody.sanderson@grace.com

Phone: 803 648 9575

Organization: NA

General Comment

I am plant manager for a clay mine and processing plant and I have several questions. Our mine is completely run by a contractor and our plant is a 24/7 operation run by company employees. Who would be responsible for the pre-shift inspection at our mine, my company or the contractor? Since the plant is staffed around the clock, then the daily area inspection we presently perform would satisfy the pre-shift inspection requirement, would it not, since it was done before the following shift went to work. Also, what data exists that this rule change would benefit mining employees? This rule change appears to have a lot of issues that aren't fleshed out yet and this leaves the mining companies exposed to off the wall citations by inspectors who interpret the rule differently than the previous 10 inspectors interpreted it.

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