

## Appendix L – Summary of Deficiencies Common to District 4 Accountability Audits and the UBB Internal Review

Issue	OA Reviews	HQ Review	District Level Review	UBB Internal Review
Level of enforcement does not always reflect repeat violations	X			X
Evaluations of gravity, negligence, and number of persons affected do not always appear commensurate with the type of violations cited	X	X		X
Multiple violations were sometimes listed on a single citation	X			X
Peer Reviews were not thorough and did not contain a means for follow-up	X			
Insufficient time spent on "off shifts" during regular inspections	X		X	
SCSRs were listed as being inspected but the required documentation (manufacturer, model, and serial number) was not present		X		X
Pumps were inspected and noted but not placed in the ITS		X		X
Inspection tracking map did not list start/stop dates and the extent of daily travel was not clearly documented on the map		X	X	X
Evaluation of "who knew" was not always adequately documented or rationalized		X		X
Two citations were issued for inadequate rock dust, but there was no evidence that rock dust samples were collected		X		
Part of the mine inspection was not completed. The map and inspection notes did not reflect that an intake entry was traveled		X		X
Daily cover sheet (MSHA Form 7000-10I) did not specify the type of shift for each inspection day (production, maintenance, or idle)			X	X
Inspectors did not specify in hard copy notes that an inspection for imminent dangers was conducted as soon as practical after arrival on the section			X	X
Hard copy notes did not state that the inspector arrived at the mine in advance of the shift start time on the first day of the inspection			X	X
Hard copy notes did not indicate there had been an examination for DTI (dates, times, and initials) when inspecting on an MMU			X	X
On occasion, the daily sheet did not list the inspection areas for that day			X	
A few daily sheets did not list the arrival time. Also, dates in the hard copy notes did not always correspond with dates in the IT system			X	X
Inspections were not conducted on all working shifts			X	X
A rock dust survey collected did not include samples from a representative number of crosscuts			X	X
During a respirable dust survey, on the 021-0 MMU, conducted 11/14/2008, the inspector checked the 020-0 equipment the same shift. The 2000-86 form did not document the length of the shift in the comments section. Only 7 hours of underground time were submitted on his T&A including 6 hours on the MMU and 1 hour outby			X	
The six noise survey 2000-84 forms submitted the first quarter of fiscal 2009 did not contain the names of the miners surveyed			X	
On one date, the CMI indicated MMU activity in his notes; however, his time and activity (T&A) report does not indicate any MMU time			X	