

TESTIMONY REPRESENTING THE STATE OF WEST VIRGINIA
OFFICE OF MINERS HEALTH SAFETY & TRAINING
CONCERNING PROPOSED RULE CHANGES IN EXAMINATIONS OF WORK AREAS
IN UNDERGROUND COAL MINES

HEARING DATE : JUNE 7, 2011

CHARLESTON, WV

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THE STATE OF WEST VIRGINIA TAKES THE PROCESS OF COAL MINING VERY SERIOUSLY, AND GUARDS THE HEALTH AND SAFETY OF THE MINERS VERY CLOSELY. WE FEEL THAT ADEQUATE EXAMINATIONS ARE A VITAL PART OF THE OVERALL MINE SAFETY EFFORT. WE CANNOT, HOWEVER, AGREE TO THE PROPOSAL THAT IS THE TOPIC OF THIS HEARING TODAY. PRIMARILY, THE CONCEPT THAT MINE EXAMINERS EXAMINE FOR "VIOLATIONS" AS PART OF THEIR PRE-SHIFT OR ON-SHIFT EXAMINATIONS WE FIND PARTICULARLY OBJECTIONABLE.

THIS POSITION WAS VOICED TO THE AGENCY AND ITS MANAGEMENT AS PART OF A MEETING IN ARLINGTON WITH MEMBER STATES OF THE INTERSTATE MINING COMPACT COMMISSION LAST MONTH. DURING THAT MEETING NO STATE MINE SAFETY ORGANIZATION SPOKE IN FAVOR OF THIS APPROACH. WEST VIRGINIA CONCURS WITH THE POSITION OF OTHER MINE SAFETY REGULATORY ORGANIZATIONS IN THEIR OBJECTION TO THE RULE AS PROPOSED. *