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Docket: MSHA-2013-0037

Advanced Mine Rescue Training for Coal Mine Rescue Teams, Notice of availability; Request for comments 30 CFR 49.50

Comment On: MSHA-2013-0037-0003

Criteria to Certify Coal Mine Rescue Teams

Document: MSHA-2013-0037-DRAFT-0009

Comment from Alexander Robles, Colorado School of Mines, MSHP

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General Comment

See attached file.

Attachments

IG7A

MSHA-2013-0037-COMM-5

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IG7A: Advanced Skills Training, Activities for Coal Mine Rescue Teams.

General comments:

IG7A provides a good basic format for Mine Rescue Trainers to quickly develop training exercises for their mine rescue teams. Areas **1, 2, 3, 7, and 10** can be considered basic mine rescue exercises. Areas **4, 5, 6, 8, and 9** are exercises that most teams do not normally practice on and can be considered advanced. Recommend that an exercise on the actual construction of ventilation controls be added.

Recommendations:

Move **Expectations for Mine Rescue Team Members** from the end of the publication to after the introduction and before Team Performance evaluation.

Part 5 of this section, "**Mine Rescue Contest vs. Real Mine Emergency.**" Is very important and should be emphasized by modifying it from two bullet comments to a paragraph with supporting comments if necessary. The paragraph should elaborate on the facts that an actual mine rescue is not a timed event and therefore teams should proceed deliberately and safely, not necessarily as fast as they possibly can.

Also, teams should consider that they can expect considerable delays in their movement or exploration underground caused by the time needed for communication to be relayed from the team through the fresh air base to the incident command center and back. Additional delays can be caused by the time required for incident command evaluation of information provided by the team and decision making.

Although not under the purview of this publication, the format of mine rescue contests should be reviewed and modified to incorporate and actually perform the exercises found in IG7A, as well as additional rules added that prevent teams from performing actions harmful to victims in order to complete exploration within the time limit. Regarding MERD's, recommend that the rules for MERDS be changed to allow for advanced mine rescue training in the MERD format without 3 total teams and a declared winner. This would allow teams to receive valuable advanced mine rescue training at recognized facilities and still meet MSHA requirements for contest participation.

Additional advanced mine rescue training:

The majority of events in which mine rescue teams are called on to actually perform rescues or recoveries do not involve exploration in smoke or under apparatus, and require skills normally possessed by surface first responders. Recommend that teams be trained on technical rescue skills such as collapse rescue extrication, trench rescue extrication, machine entanglement extrication, and collapse syndrome treatment first aid as mentioned in IG7.

Many underground coal mines are using low pressure air bags for heavy lifting and rescue purposes. A recent fatal accident involving the use of the bags shows the need for standardized training in their use. Some coal mines have a need for their Mine Rescue teams to be able to perform rope rescue at the awareness /operations / technician levels. Recommend that exercises be developed to train teams in these 'advanced' capabilities.