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State of West Virginia
Earl Ray Tomblin, Governor

WV Office of Miners' Health, Safety & Training
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November 22, 2013

Honorable Joseph Main
Assistant Secretary of Labor for Mine Safety and Health
1100 Wilson Boulevard Room 2424
Arlington, Virginia 22209-3939

Sir,

The State of West Virginia desires that the Request for Information (RFI) regarding "Refuge Alternatives for Underground Coal Mines" scheduled to close December 6, 2013 be extended and modified to allow for the collection of addition information critical to the subject of mine emergencies.

We propose that the request be modified to collect information concerning likely scenario narratives describing the chain of events that might lead to the need for miners to evacuate a mine and their challenges to escape. This is information critical to predicting the conditions miners might face for which Emergency Response Plans (ERP) are being designed. Currently there is no specific source either within your agency or in the mining community as a whole that provides guidance on this key subject. Absent this information, individuals drafting ERPs are left with only their best guess of what the conditions and challenges might be, the result being conflict as to what are the conditions from which the miner is to be protected.

A writer of an ERP equipped with such guidance would be able to refer to a standard scenario or scenarios that best fit their mine; allowing for better definition of the types of services, training and supplies that should be made available. It will allow providers of mine emergency services, training and supplies to better design to miner's needs. It will also allow MSHA to better review and comment on ERPs and mine emergency devices, such as Refuge Alternatives, that are submitted for approval.

Since there is not likely a single narrative scenario that would apply to all underground coal mines, it is proposed that the request solicit scenarios that relate to specific types of mining and mining conditions. The result of this exercise is envisioned as a portfolio of likely mine emergency scenarios that would guide those responsible for emergency response in designing the necessary planning, mine emergency devices and training to select those that are most applicable to a specific mine.

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While the current Request for Information is limited to underground coal mines, we encourage the agency to consider issuing a similar request for other mining activities under its jurisdiction, as the need exists in these areas as well.

West Virginia believes such an action would greatly enhance the safety of the miners, thus stands ready to participate in anyway needed in compiling and vetting these scenarios.

Regards,



Eugene White, Director

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