

PUBLIC SUBMISSION

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Docket: MSHA-2014-0029

Request for Information to Improve the Health and Safety of Miners and to Prevent Accidents in Underground Coal Mines

Comment On: MSHA-2014-0029-0001

Requests for Information: Improving the Health and Safety of Miners and to Prevent Accidents in Underground Coal Mine

Document: MSHA-2014-0029-0017

Comment from pierre mousset-jones, NA

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General Comment

G. Certification, Recertification, and Decertification of Persons
 Certified To Conduct Mine Examinations in Underground Coal Mines

It is essential that a competency training and certification program be established for underground technicians and engineers responsible for mine ventilation, health and safety. Many of the health and safety accidents and problems encountered in US Coal and Metal/Non-metal mines are due to the lack of adequately trained and experienced personnel in the mine, who are responsible for mine ventilation health and safety. Underground mines in the US are getting more sophisticated in their ventilation design technology, techniques such as "controlled recirculation" could be used in coal mines to improve conditions and lower energy costs, if "qualified", or "competent" ventilation engineers are employed at the mine. A number of advanced mining countries such as Australia, South Africa, Germany, UK, and Canada have competency requirements and training programs for personnel responsible for mine ventilation and health and safety in their underground mines. It is time for the US to establish similar requirements to ensure that the ventilation and health and safety procedures and practices implemented at an operating underground mine are the responsibility of a "competent" or

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"qualified" person, whose training and experience has met stated standards. A "competent" or "qualified" mine ventilation technician or engineer should be required at most underground mines in the US. Small mines could be allowed to apply for a variance to such a requirement by employing a suitably qualified and experienced consultant to assist them with their mine ventilation design and implementation etc. The Underground Ventilation Committee of the SME, (<http://www.smenet.org/uvc/>) has discussed this issue for many years and has the expertise to provide advice on setting up appropriate standards for the training and the level of the required knowledge and experience of mine ventilation technicians and engineers. In addition, Mine Inspectors need to be better trained in mine ventilation design and technology, and should closely approximate the knowledge and experience level required for a "competent" or "qualified" mine ventilation technician or engineer at a mine.