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November 27, 2015

MSHA Office of Standards, Regulations and Variances

In response to MSHA request for comments on requiring miners to wear reflective clothing in underground coal, metal and non metal mines, I have listed a large number of reasons, along with other information, why reflective clothing SHOULD be required in ALL underground mines.

Because of poor visibility, we know equipment operators do not always see miners and this is the main cause of haulage accidents. The solution, make miners as visible as possible with reflective clothing so they can easily be seen from any direction. 18 inches on helmets is not enough.

It is not enough to ask miners to wear reflective clothing. It must be a requirement and part of their personal protective equipment. They wear hard hats, steel toed boots, gloves and safety glasses but reflective clothing that can prevent them from being run over, crushed or killed is not required? MSHA mine inspectors wear reflective clothing. Miners are at a higher risk than inspectors. Imagine how many of these awful accidents would have been prevented, if only miners had been more visible.

Australia, Canada, Europe, Chile and to my knowledge, most all other countries with safety standards require miners to wear reflective clothing and the reflective must be a certain width and amount and must be compliant to safety apparel standards.

Many miners do wear reflective clothing but the reflective material most are wearing is only a half inch wide and non compliant to ANSI high visibility safety apparel standards.
Fluorescent yellow/green and orange fabric stripes miners are wearing do not reflect light. They are not made for underground mines. These colors are for daylight and hard to see in dark mines.
Highway workers in high risk areas are required to wear reflective that is a minimum of 2 inches wide, and wear 310 sq. inches.
Since miners work in confined areas near heavy equipment, underground mines are darker and more dangerous than highways, more reflective is needed and in locations where it will be most visible and not be covered up by bib overalls most miners are wearing.

In response to MSHA request, asking how much reflective is needed and where it should be located, I have enclosed a picture that best describes how much reflective is needed and where it should be located, also pictures of what some miners are now wearing.
I suggest a reflective stripe pattern running horizontal on the upper torso and arms.
The shirt picture with the most reflective has 400 sq. inches of 2 inch wide reflective silver.
The entire upper body is illuminated in bright light so miners can easily be seen from any direction.
For complete body coverage, 2 inch wide reflective silver stripes are needed to encircle the legs at the thighs and below the knees.

All workwear manufacturing companies and all distributors of reflective materials have 2 inch wide, ANSI compliant reflective. Compliance to a requirement should not be an issue.
I suggest the requirement for newly hired miners and miners not wearing reflective, go into effect as soon as possible. For miners now wearing some reflective, when their clothes are replaced.

Sincerely,

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ABT8-COMM-12

6. REQUEST FOR COMMENTS ON REQUIRING MINERS TO WEAR REFLECTIVE CLOTHING IN UNDERGROUND COAL AND METAL AND NONMETAL MINES

MSHA is also considering a requirement that miners in underground mines wear reflective material in order to reduce the hazards associated with poor visibility. Existing § 75.1719-4(d) requires that each person who goes underground in a coal mine wear a hard hat or hard cap with a minimum of six square inches of reflecting tape or equivalent paint or material on each side and back. Metal and nonmetal mines do not have a similar requirement. In MSHA's experience, however, many miners in underground coal and metal and nonmetal mines also wear clothing with reflective material. One of the recommendations in MSHA's 2010 safety initiative, *Safety Practices around Shuttle Cars and Scoops in Underground Coal Mines,* was that "Miners should always wear reflective clothing so that they can be clearly seen by the shuttle car and scoop drivers."

MSHA solicits comments on whether the Agency should require that miners wear reflective material to make them more visible to equipment operators and, if so, how much and where. Comments should be specific and include alternatives, rationale for suggested alternatives, safety benefits to miners, feasibility considerations, and supporting data.

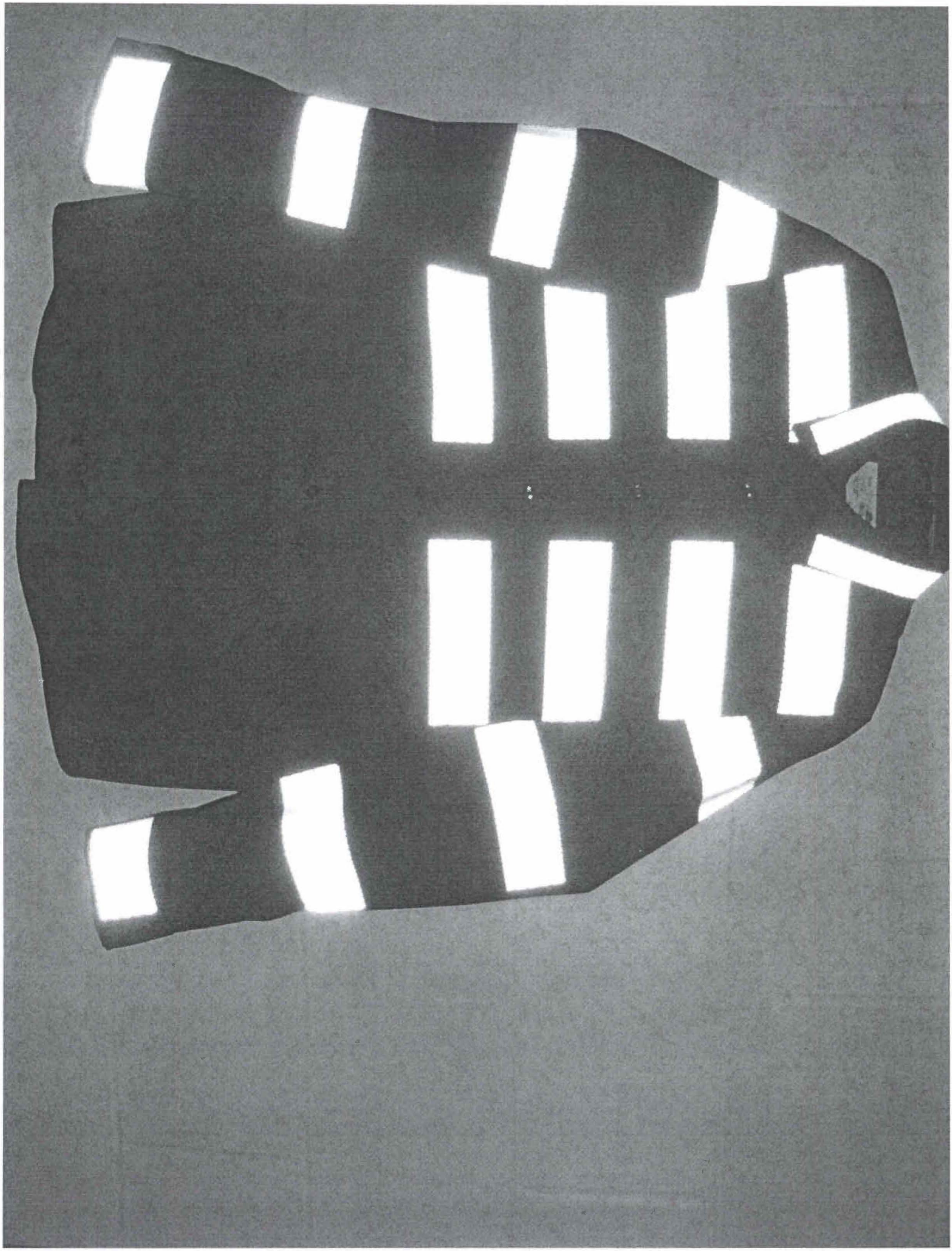
B. § 75.1733(b) Requirements for Proximity Detection Systems

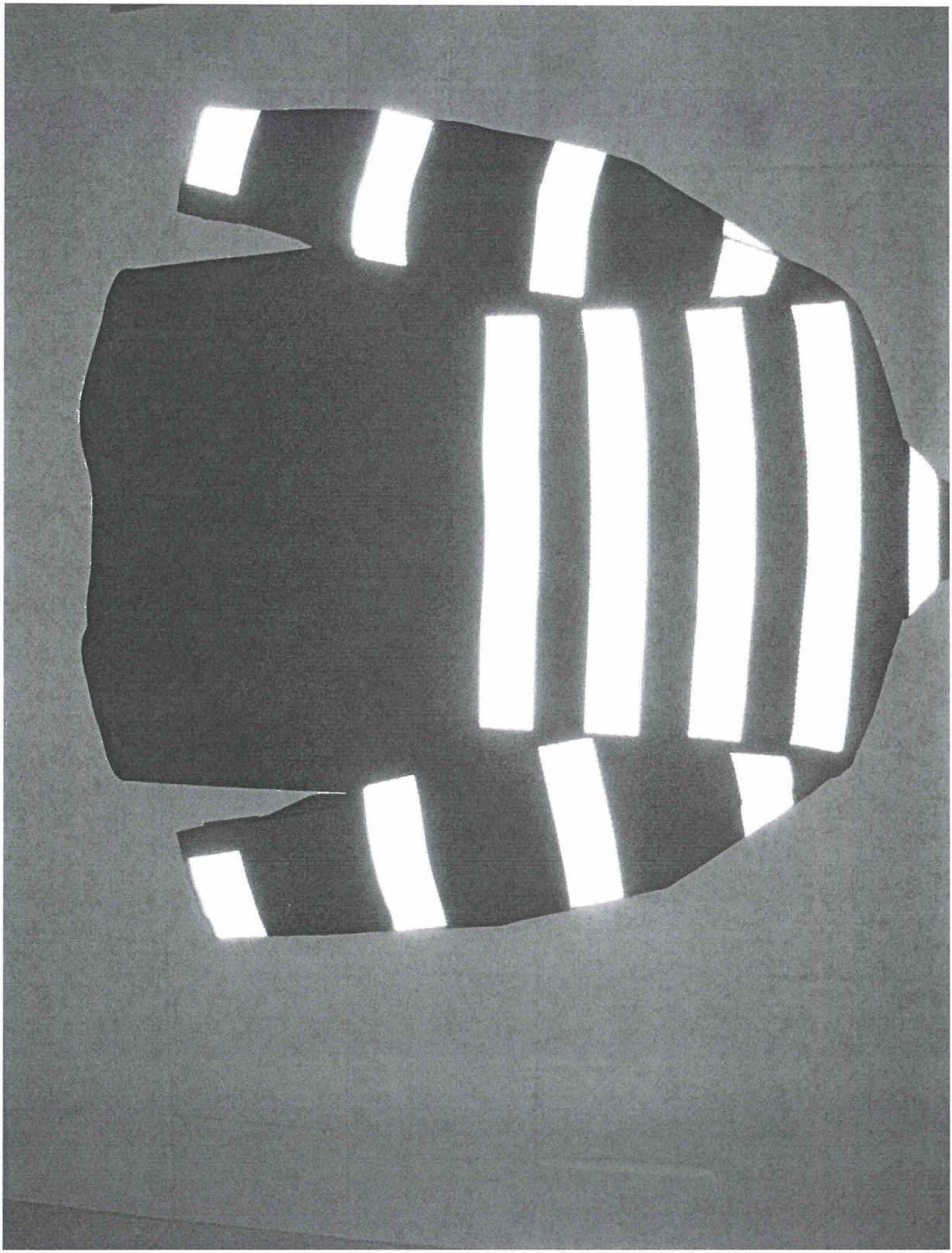
Proposed § 75.1733(b)(1) would require that a proximity detection system cause a machine to stop before contacting a miner except for a miner who is in the on-board operator's compartment. This proposed requirement would apply to coal hauling machines and scoops on the working section to prevent pinning, crushing, or striking accidents. MSHA intends that the proximity detection system would stop all movement of the machine, such as tramming, conveyor chain movement, and raising or lowering the bucket of a scoop that could cause the machine to contact a miner. The machine would remain stopped while any miner is within a programmed stop zone.

In the RFI, MSHA asked for comments on the size and shape of the area around machines that a proximity detection system monitors and how systems can be programmed and installed to provide different zones of protection depending on machine function. Some commenters stated that an effective proximity detection system should cause the machine to stop before a miner enters the hazardous area around the machine. Several commenters suggested that protection zones should be largest when tramming and that reduced protection zones are needed for certain mining operations.

Some commenters stated that zone size should be determined using a risk assessment considering the speed at which the proximity detection system can alert the operator, the reaction time of the operator, and the number of people in the working area. Another commenter stated that work practices vary among mines so that one specified zone may not work for all mines.

In its comments on the RFI, NIOSH stated that the goal of a proximity detection system should be to prevent machine actions or situations that injure workers while not placing restrictions on how the





What Some Miners Are Now Wearing