

Subject:

Rin 1219-AB78, Docket No. MSHA-2014-0019

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From: Scott <scottwrus@aol.com>

To: mcconnell.sheila <mcconnell.sheila@dol.gov>

Sent: Fri, Dec 11, 2015 3:16 pm

Subject: Rin 1219-AB78, Docket No. MSHA-2014-0019

December 11, 2015

Sheila A. McConnell:
Office of Standards, Regulations and Variances

Dear Ms. McConnell:

I have been reading comments and transcripts on meetings you held at different locations. From what I read, it appears proximity detection systems work good on equipment at Consol Energy but Arch Coal, Barrick Gold and Peabody Energy say they have problems or need more time to improve technology. I believe the makers of detection systems will work hard to solve any problems these companies say they are having. Proximity Detection Systems should be required in all underground coal, metal and non metal mines. I am wondering about the lights on this equipment, is it being cleaned and maintained and if so, how often. All who have commented on reflective clothing say it should be required. I believe reflective clothing is the next best thing to proximity detection. A commenter by the name of Johnny Waggoner went into great detail on reflective clothing and I agree with all he said. I have been involved in safety for many years and have never seen a shirt as visible as the one he showed in the picture. Comparing his reflective to reflective miners are now wearing is like comparing a 25 watt light bulb to a 100 watt light bulb. Only the best should be worn when it comes to something that can save lives. MSHA is asking for comments on how much reflective and where. If MSHA required reflective like in Mr. Waggoner's shirt picture and reflective on legs, I don't see how garments could be made any more visible than that. It is a mystery to me why all these mining companies have so many safety meetings and many like to brag about their safety awards but they allow miners to wear reflective non compliant to ANSI safety standards. Poor visibility is the main contributing factor in most haulage accidents. ANSI COMPLIANT reflective should be a requirement in all underground coal, metal and non metal mines and the more reflective the better.

Sincerely,
Ralph Scott