

PUBLIC SUBMISSION

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Examinations of Working Places in Metal and Nonmetal Mines. 30 CFR Parts 56 and 57

Comment On: MSHA-2014-0030-0001

Examinations of Working Places in Metal and Nonmetal Mines

Document: MSHA-2014-0030-0020

Comment from Anonymous Anonymous, NA

Submitter Information

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Organization: NA

General Comment

As an employee of an operator, I strongly oppose this rule. The analysis performed by MSHA is laughable and does nothing to address or improve safety in our workplaces.

The burden calculation estimates only five minutes per shift additional time required by this rule. This is a gross underestimation of the time it would take to record, sign, and date every individual action taken place during a shift examination. I strongly believe in investing as much time as needed to make sure work is done safely. Recording corrective actions is taking away from time which should be spent doing corrective actions, and would be much longer than five minutes per shift.

The burden calculation completely ignores a major part of the rule which would require the full workplace exam to occur at the start of the shift. The workplace exam is more effectively performed over the entire shift, as hazards do not occur on a schedule. Any hazard can take place any time - they don't just happen at shift change. The current methodology of performing the workplace exam throughout the shift is much more effective and efficient also.

As an employee, I do not want to record my name and every corrective action that I have performed, for later analysis by a subjective MSHA investigator who may or may not determine that what I have done is adequate or not. It will hinder me in my job of working safely without having to second guess my best judgment and professional experience on technicalities subject to regular twice annual MSHA inspections/investigations.

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The energy burden calculation considers uranium but does not consider coal. As the reader may know, coal has a much higher impact to energy security than uranium.