

# PUBLIC SUBMISSION

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**Docket:** MSHA-2014-0030

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-2014-0030-0035

Comment from maintenance planner, NA

## Submitter Information

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## General Comment

MSHA would like the exams to be done "before work starts", with an implication that it be done prior to the shift. However, this is not practical for large operations with break-down or break-in work, ie, mechanical devices that fail during the shift, and require immediate troubleshooting or repair.

Unless the mine sent an examiner out to inspect every possible working place on the site every shift, on the potential that something might break down and need a repair crew, it cannot be done prior to work starting on the shift. And that is a huge waste of resources, to simply examine an area where work might need to be done.

In addition to break-in work, a typical mine could have a dozen managers/supervisors or technical personnel that do random checks of areas or equipment. As a maintenance engineer, I have no set plan or route to my day, I simply choose (based on time available, break down, planning and experience) to walk throughout my plant operations, and observe. How is a dedicated examiner supposed to know, at 7 am, where I might decide to walk at 11?

The regulations speak of shifts. How does MSHA view shiftwork, especially overlapping multiple shifts? At my operation, I have miners working on 12 hour shifts that run 0600 to 1800, and 1800 to 0600. I also have 12 hour shifts running from 0700 to 1900, and 1900 to 0700. At the same time as these, I have 8 hour shifts that start at 0500, 0600, 0700, and 0730. And, I have second shifts that start at 1500, and run for 8 hours. Do I need an examiner for each

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shift? Can an examiner on one shift "overlap" his exam to those on a later shift? If so, how much later? Can a miner on a 12 hour shift "use" the exam done by an 8 hour shifter, if that 8 hour shift is now over but the 12 hour shift is not?