

# PUBLIC SUBMISSION

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

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Examinations of Working Places in Metal and Nonmetal Mines

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Comment from Elizabeth Koepsel, NA

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## General Comment

Examinations of Working Places in Metal and Nonmetal Mines

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Mining continues to be one of the most hazardous occupations in the United States. Miners are extremely important to our country because they retrieve and allocate natural resources that we need, as a nation, to function. The Centers for Disease Control and Prevention reported 521 occupational mining fatalities from the years 2003-2013 (2013). Although the number of fatalities drastically decreased from 2010-2012, the numbers are beginning to trend upwards (Centers for Disease Control, 2013). Miners go to work everyday chancing death. Under the Federal Mine Safety and Health Act, miners are promised to be alerted of unsafe or unhealthy conditions in the mine (United States Department of Labor, 1977). Because there are not tight standards on examination and reporting regarding working conditions in mines, miners are essentially not protected under this act.

The proposed rule to amend the current standards is crucial in regard to decreasing mining fatalities and accidents. As of 2013 there were over 13,000 active mines in the united states (CDC, 2013). The new rule standards state that the mine be checked once at the beginning of every shift, to ensure safety and identify hazards (United States Department of Labor, 2016). In addition to examination standards, the MSHA also sets forth reporting standards. The MSHA proposes that all hazards be reported and documented along with the health risks associated and

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corrective action taken (United States Department of Labor, 2016). By adding these two aspects to the examination standards, many hazards, accidents, and fatalities can be avoided. Therefore, healthcare costs in the mining community may decrease. The reporting aspect is where the most public health benefit will derive from. The more aware the miners are of the hazards and the health risks associated with them, the more cautious and willing they may be to report a hazard. Occupational health is a strong component of public health, and if occupational health is significantly changed, then the public health of that community is significantly changed. With implementation of a new rule, there will always be resistance and a degree of non-compliance in the early stages. However, I do not see any negative impacts that would arise due to the implementation of this new rule. The rule is designed to improve health and safety through simple measures and minor changes. The implementation and compliance with the new standards will only bring about positive change regarding health and safety of the miners. However, a measure included in the new standards may offer a degree of inaccuracy secondary to the quality and accuracy of the reporting. Some days they may forget to document a hazard, or be document the hazard inaccurately or not in enough detail. The point of the documentation is to have the miners be aware of their risks. If someone is not documenting properly, the post implementation evaluation of the new standards might be skewed.

The mining community are the largest stakeholders that are going to be affected by the proposed new standards. The miners deserve environmental justice. They deserve to be protected when they go to work and to be aware of all the risks associated with their chosen career. If we do not protect our miners and place standards on how to evaluate working conditions, we could see a decrease in the amount of employees in mines. As mentioned earlier, we need these miners to gather these natural resources from the earth to sustain life on our planet.

In summary, health should not be compromised due to your choice of occupation. All miners need to be aware of hazards and safe working practices. I strongly advise the implementation of these new standards to ensure we are doing everything we can to protect our miners, as we had promised them initially under the Mine Safety and Health Act. The act needs more components to ensure the highest measures of safety are being taken. The most important of these components being the new examination standards of working conditions and standards of reporting hazards. This is a long overdue amendment to the 1977 act. I know that this amendment will be a positive movement in health and safety in mining populations.

#### References

Centers for Disease Control and Prevention. (2013). Statistics: All Mining. Retrieved from <http://www.cdc.gov/niosh/mining/statistics/allmining.html>

United States Department of Labor. (2016). Mine Safety and Health Administration. Retrieved from <https://www.msha.gov/>