

PUBLIC SUBMISSION

As of: 8/25/16 1:00 PM Received: August 17, 2016 Status: Posted Posted: August 25, 2016 Tracking No. 1k0-8re0-15km Comments Due: September 06, 2016 Submission Type: Web

Docket: MSHA-2014-0030

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

Comment On: MSHA-2014-0030-0019

Examinations of Working Places in Metal and Nonmetal Mines

Document: MSHA-2014-0030-0056

Comment from Katia Hawatmeh, NA

Submitter Information

Name: Katia Hawatmeh

Address:

3555 Grandview Pkwy Apt 223

Birmingham, AL, 35243

Email: katiahawatmeh@gmail.com

Phone: 7349272478

Organization: NA

General Comment

Amending the standards for the examination of working places in mines to ensure workers safety and health is extremely important. According to the International Labor Organization around 313 serious injury incidents occur each year due to work hazards that result in disabling injuries and economic burden of 4% on global gross domestic product. The U.S Bureau of Labor Statistics states that employers record more than 3 million occupational injuries annually (Frumkin, 2016). The CDC's mining facts report of 2014, for MNM mines, states that fatality rate was 12.5 per 100,000 FTE employees and the rate of nonfatal lost-time injuries was 1.8 per 100 FTE employees, which resulted in 56,633 days lost from work. Since mining is one of the most hazardous occupations in the nation, more light should be shed on this issue.

The international labor organization estimates the cost of occupational injury to be \$1.25 trillion per year (Camm et al). There are many factors that we should consider when looking at workplace injuries; there are economic consequences that include direct, indirect and productivity costs and social consequences that include stress, anxiety and group conflict. Direct costs include medical and compensation expenses, indirect costs include the cost of injury on the community that is due to the change in economic circumstance in the family (Camm et al). For example, increased need for social and economic support to the family due to

AB87-COMM-33

8/25/2016

increased need for care and decreased ability to work. As for the social consequences, the American Institute of Stress estimated costs of stress and ills to an injury, whether it was physical, mental or behavioral, to be \$300 billion a year (Mine safety and health program technical staff, 2011).

Inspecting the workplace and documenting the inspection not only benefits the worker but the managers as well. It saves the workers from work hazards and harmful incidents and it saves the employer the amount of incidental compensation he has to pay. Inspection resources at most agencies tend to be limited and there are roughly seven inspectors for every million covered workers for federal and OSHA programs (Frumkin, 2016). This is an important factor for teaching and training an on-site employee to perform daily worksite inspections. MSHA's analysis on small businesses compliance cost shows that it will not have a significant impact on small entities and the burden of the additional cost of \$10.1 million annually in MNM mine operators is less than one percent of revenue (26824, 2, 3). According to the American Society of Safety Engineers, "every \$1 spent on prevention can lead to \$3-6 in loss avoidance" (ASSE, 2010). Thus, we should look at the protective costs of this project as savings rather than costs. One of the reasons this proposal is important to me because I have witnessed my uncles dealing with injuries and work related hazards on a small scale. My uncles have two plastic factories that produce plastic cups, plates, wraps, and packaging materials. One of the major losses we suffered from is when we lost my youngest uncle due to a fire extinguisher malfunction while he was trying to put off a minor fire at the factory. This incident affected his four young kids and stay at home wife's future. Another major incident that happened few years after my uncle's death is when one of the factories caught fire and got burned down and some workers were injured. My other uncle suffered from great economic losses because he had to stop production until he could rebuild the factory, lost contracts with some of the contractors, had to buy new machinery and compensate the injured workers. If my uncles performed an hour a day of work hazard detection they would not have had to experience some of these and other tragic incidences and losses.

Therefore, agreeing to MSHA's protocol of inception, I strongly encourage having a specialized and trained person to do these inspections because an experienced knowledgeable person will be able to detect hazardous situations more than a less specialized person. I also agree with MSHA's believes that the proposal would enhance the quality of working place and reduce the incidences of injuries and death due to better precautions taken. Consequently, decreasing total economic and social costs predisposed by the injury.

References:

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