

Comments on: MSHA-2014-0030-0001  
Examinations of Working Places in Metal and Nonmetal Mines

Submitter Information

Name: Anonymous  
Company: NA

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I agree with many of the concerned commenters how important safety is to our industry and the significant role MSHA plays in promoting it. We work in a harsh environment with unforgiving equipment and potential for accidents and injuries. That being said, we think the new proposed rule for workplace exams is redundant and unnecessary, will create more paperwork, reduce productivity and in the final analysis become another tool in the mine inspector's toolbox to write citations.

We currently conduct workplace exams and inspections throughout the day from pre-shift inspections on equipment, on-going plant inspections, daily workplace exams and personnel just being observant and reporting issues and concerns as they arise. According to MSHA "Mining operations have dynamic work environments where working conditions can change rapidly and without warning." Therefore, performing an inspection before the shift has started could not possibly be as effective as a program where monitoring is taking place throughout the day.

We would be better served if MSHA could devote more time to education and training, rather than attempting to place more of a burden on operators to provide documentation that could ultimately be used to penalize us.

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