

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-2014-0030-0054

Examinations of Working Places in Metal and Nonmetal Mines, Extension of comment period; close of record.

Document: MSHA-2014-0030-0062

Comment from Robert Jungers, NA

Submitter Information

Name: Robert Jungers

Organization: NA

General Comment

I've been at the same mine 30 years. Although I have worked on this mine property I've never worked in the mine. I have been in the mineral processing part of the property. The CFR many times falls short for folks like myself because it targets mine activity and not the mill activity etc. A pre-shift inspection has been discussed in years past but has been waved for us due to the volume of area. A proper pre-shift inspection could take 3 hrs. and we know that production will not tolerate this.

This idea of competent person has troubled me for some time as my employer feels anyone can do anything right off the street along with knowing everything too. The supervision that should be deemed competent isn't and so then if done with competent in mind put the task on the shoulders of folks like myself.

It's unwanted and unfair. Folks like myself might be the most knowledgable in many cases but we don't desire that liability. That belongs to the folks who desire the so called (promotion).

If you want to make a rule, make one that forces employers to promote the best people by making that employment desired. What I have been witness to is the employer destroying the best people because they know to much. This wasn't always the case.

I have personally lost a lot of hope for regulators like MSHA and OSHA (mine and tunneling).

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Had both regulators listened to me and took my new rule as an CFR addition we would have some teeth to push back. Instead folks like myself have to sit and watch almost daily the mistakes made and one in recent months that was almost a burn fatality. Folks like myself might work at a mine but we are not miners and we need rules that will protect us. Our property has been in Crisis and I've been communicating with the employer and regulators in many ways for years and shouldering a whole lot of bad acting and adversity.

Thank you for listening. Robert Jungers, Certified Miners Rep, - ILWU Local 30 Safety Rep.