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Safety Improvement Technologies for Mobile Equipment at Surface Mines, and for Belt Conveyors at Surface and Underground Mines.

Comment On: MSHA-2018-0016-0002

Safety Improvement Technologies for Mobile Equipment at Surface Mines, and for Belt Conveyors at Surface and Underground Mines.

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Comment from Nestora Santos, NA

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General Comment

See attached file(s)

Attachments

Comment for MSHA-2018-0016

AB91-COMM-2

After reading the proposed policy for safety improvements for mobile equipment at surface mines and underground mines I feel that it would be necessary to save lives. I investigated the number of fatalities that occurred during 2017 in the United States at coal mines and metal / non-metal mines. I was astonished! There were 28 fatalities of which 10 involved heavy equipment, 5 involved conveyors and 3 involved highwalls or dump sites. Out of all the fatalities 7 victims had over 10 years of experience.

This policy proposes that there be more safety regulations implemented to prevent these accidents. There needs to be better enforcement of safety violations. Some of those that were killed last year were the ones that should have been able to prevent the accidents all together. A Safety Superintendent, a plant operator. A groundskeeper, a pre-shift examiner, a foreman and 2 miners with over 23 years of experience were killed last year.

The regulations that the MSHA are proposing should have been implemented along time ago. They want to make sure that everyone wears a seatbelt. This should not be hard to do when you already should be doing it if you drive a car. The machines that people are operating on mine sites are measure in tons not pounds. The sheer size alone should be scary enough. If we have sensors on our regular vehicles there should be sensors on those massive vehicles. In fact, there should be additional sensors to warn the operator or prevent the operator from moving the machine if he does not have a seatbelt on.

In almost all the fatality reports MSHA found that either safe work practices were not being followed, proper training was not being conducted, no safety guards on the conveyors, and operators did not follow proper procedures. There needs to be a better way to make sure that these things are being implemented and followed at the mine sites.

Along with the added safety improvements that are being proposed MSHA should hold the mine operators/owners more accountable. There should be more inspections if your mine had 1 fatality. If your mine had more than one and the same safety violations occurred, the mine should be shut down. Shutting down a mine would get people to listen and maybe correct violations that should have been done the first time.

Twenty-eight fatalities in a single year in the United States is way too many. We need to push this policy forward and come up with harsher consequences if the safety regulations are not followed. There needs to be continuous monitoring of training. Policies and procedures as well as safety manuals for all equipment that is being used. Employees, miners, truck operators and everyone at a mine site needs to be held accountable for following all the safety measures and procedures.

Those twenty-eight miners who lost their lives could still be alive if everyone was following the proper safety measures. Safety procedures are there for a reason. We need to learn from all the previous fatalities, look at what could have been prevented, and want to make changes so that everyone can home. Twenty-eight fatalities is twenty-eight too many for a year. The number needs to be reduced and hopefully one day it could be zero.