

PUBLIC SUBMISSION

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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-2018-0016-0111

Safety Program: Surface Mobile Equipment

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Comment from Ciarimboli, Steven

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General Comment

I believe the Proposed Rule is needed and MSHA is on the right track with it but I feel it lacks the enforcement value needed to actually promote a change in practices on-site. Coupling the new Proposed Rule with a targeted enforcement campaign that really focuses on getting back to the basics of site safety (blocking from motion, task training, pre-ops, seatbelts, fall protection, etc...) in my opinion would greatly enhance its value. Many of the recent fatalities have revolved around basic practices that would be standard in any industry utilizing Surface mobile equipment. Writing a Safety program is the easy part. The implementation of the program into the daily practices at the mine is the difficult part. With the right focus and enforcement I think MSHA can bridge the gap between words on paper and actions on-site.

AB91-COMM 12