

# PUBLIC SUBMISSION

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**Docket:** MSHA-2018-0016

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

**Document:** MSHA-2018-0016-0143

Comment from Larch, Douglas

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## General Comment

Let me start by saying I applaud the rule making effort here. In recent memory many miners have been hurt or killed by Surface haulage equipment. This effort is not without merit. That said I for one would encourage MSHA and Mine Operators alike to enforce the rules on the books today. MSHA is not always adept at using the tools that are already in the toolbox. Mine Operators often lose sight of what's really important and that is why we have regulators in the form of the Mine Safety and Health Administration. Without the historic efforts put forth by MSHA we would not be where we are today with regard to safety and compliance. I for one do not believe we can enforce or regulate our way to ZERO. The Workplace Exam and the equipment Pre-op if done properly will go a long way to providing exactly what MSHA is proposing here. If Mine Operators will do what is required and look at both

documents then use the information provided to bolster safety in a meaningful and immediate way this rule is largely unnecessary. Couple the rules requiring general equipment maintenance and keeping roads well lit and in good repair now we are really going in the right direction. Add emphasis to guarding on conveyors now this becomes a winning combination. While it may sound good to have a plan for safety with regard to surface mobile equipment in my opinion it will largely be ignored by both regulators and miners alike. Current practice by MSHA inspectors they look at the plans like HCP, HAZCOM, and the like and if you have it they are happy. SO this too will become another dusty book on a shelf in a mine office. Often they do not check to see that the required training set forth by the plans and the regulations are even being completed. Emphasize good work practices and share best practices. MSHA can make better use of its resources by allowing inspectors to do more walk and talk type work with miner and supervisors alike. If enacted this will be largely ignored and will become just one more required plan that the inspector checks off his list of things he has to do before he 40s out.