

Received 4/14/06
MSHA/OSRV

-----Original Message-----

From: Allan Jack [mailto:cockerjack@verizon.net]
Sent: Friday, April 14, 2006 8:54 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: RIN: 1219-AB46

Hello, I am Allan H. Jack. I have been actively employed in PA coal mines since 1971. During this period I have worked in 8 different coal mines and in all types of varied circumstances. From very low seams of 36' to high seams of 8'. Mining has been a very good life from my family and me. I have worked as general laborer, run just about every type of equipment and was management for 17 years. During this time I was front line supervisor, shift foreman and for the last 6 years I was mine foreman-superintendent. I feel that I am an extremely experienced and well-versed coal miner and proud of it. I am presently a mine examiner at Enlow Fork mine, Consol Energy.

Enough about me—This past week, the first week of April, through the cooperation of West Virginia university, a fire school was started for all employees at Enlow Fork. During this training, we were instructed in the proper ways to extinguish fires, steps to take when encountering a mine fire, evacuation procedures, hands on fire extinguisher use on a live fire and last, donning a self rescuer and entering a smoke filled environment. This was in a large van truck and had escapeway signs, manddoors, a ramp and other obstacles that you would encounter in escaping from a coal mine.

I want to be as sincere as possible when I tell you that this was the singlemost enlightening experience of my 35 years underground. I have been around small fires before but never this heavy of a smoke filled environment. The next thing that I want to tell you is that in all sincerity, we are not prepared to evacuate. Sure, we have our yearly training on the SCSR and most people feel fairly competent on its use. But, this in no way will prepare us for what real conditions are like. I hate to admit that I became quite apprehensive trying to find my way out even though I knew that I was in no real danger.

The locator devices that are presently being discussed and researched will be fine but without proper training their only positive use will be for the people with the body bags to find the miners.

A much more positive approach would be to have some training facilities built in the coal fields were a large simulated coal mine (a few entries, x-cuts, with manddoors and an overcast or two to traverse) and have ALL miners experience this escape. A functional SCSR would be used and the experience made as real as possible. The training would be accompanied by a certificate and be updated every 3 years during a miners career. Newly hired employees would need this certificate after 6 months of experience so they would be familiar with underground workings. Also anyone, vendors, service people, etc. who enter coal mines at least 5 days a year would also be required to have this training.

I am not naive enough to realize that this would come a quite an expense but if we are really to be sincere about the safety and well being of coal miners this must be considered.

My generation of miners is nearing the end of our career. At our mine and all others, a new and younger group of faces is appearing almost daily. As we leave so does the common sense and general mine knowledge and experience that took years to accumulate. We owe it to this new generation of coal miners to be adequately trained to face any and all dangers that they will face.

I must reiterate--WE ARE NOT PREPARED. Please consider what I have suggested.

I realize, too, that the people who are most likely to not fully understand this concept are the legislators who would need to financially back an undertaking such as this. I am sure, though, that we could facilitate a tour of our coal mine under normal working conditions and then submit them to a trip though the smoke truck. Maybe then and only then would they realize what the urgency is all about.

Thank you for reading this, Allan H. Jack

AB46-COMM-2

04/18/2006