

Comments to New Emergency Response Act of 2006

Section 2:

Para.: B.ii: Plan Requirements: There should be better "in-situ" training of miners, with instruction in knowing where to go for a safe haven, and most importantly how to make the decision of when to stay and when to leave. There need to be spare self rescuer at "safe havens" and in-mine detailed and periodic hands-on training , on how to don the self rescuers under in-mine conditions. Training facilities can be set up above ground to simulate mining conditions, such as smoke, dust, water, heat and poor visibility. In my opinion in at least one of the recent mine disasters, the mining crew could have walked out of the mine safely, had they had better training in when to leave and when to stay. A directional lifeline is a must, as well as strategic placement of extra working self rescuers.

I have had many self rescuer training courses in class rooms, prior to entering a mine for a mine inspection of certain equipment, as an mining human factors, ergonomics consultant.

Classroom sessions are inadequate.

Para.: E.iv.: Post Accident -Same comments as above, plus self rescuer training must be performed under stress conditions, simulating actual emergencies. The self rescuer training will only be effective if each miner dons **working units** in adverse conditions. The current training using inactive "Training Self Rescuers" in a classroom environment is useless. The miner will remember training with an active unit in mining conditions. This will give him/her more confidence in the units, know how to don them efficiently and be more likely to don them as soon as possible, not as in some recent cases...too late. There must be **routine emergency situations training in a realistic simulation** for each underground miner. Current training is too theoretical, too much clasroom, and for new miners too far from reality for them to understand real emergency situations and how to respond.

Para E. vi.: Local Coordination- The plan for procedures and communications between operators, rescue team, emergency response team, surface personnel, etc is a good one. But it is useless and will fail unless periodic emergency situations are simulated with all personnel and systems involved. Take a lesson from the US Navy: Each emergency situation on a ship is drilled over and over, so all involved know exactly what to do in every situation. It has payed off on US navy ships...it can work in the mining industry.

GENERAL COMMENT: Good training is the answer to many mining emergencies, but not more conventional classroom training. To be effective training must be "Hands-on" in actual environmental conditions and repetitive .

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