

Mine Safety and Health Administration  
Office of Standards, Regulations, and Variances  
1100 Wilson Blvd., Room 2350  
Arlington, VA 22209-3939

May 4, 2006



9 2006

Joint Comment by Members of  
UMWA Local 6492

RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

Dear Sir or Madam:

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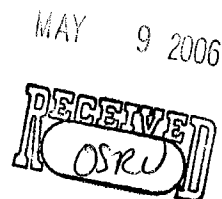
Sincerely,

  
Miner for Vision Mining  
UMWA Local 6492

AB46-COMM-5

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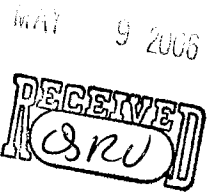
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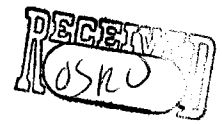
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Shawn Slayton

Mine Safety and Health Administration  
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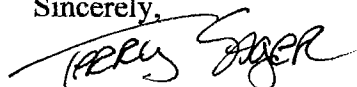
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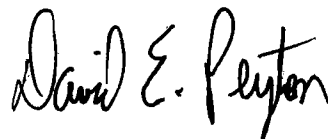
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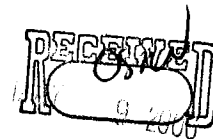
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Robert H. [unclear]  
Miner for Vision Mining  
UMWA Local 6492

A handwritten signature in black ink, appearing to read "Robert H. [unclear]". Below the signature, the text "Miner for Vision Mining" and "UMWA Local 6492" is printed in a standard font.

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RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

Dear Sir or Madam:

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RECEIVED  
OSRW

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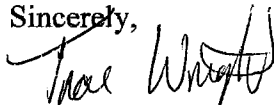
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Sincerely,

Miner for Vision Mining  
UMWA Local 6492

A handwritten signature in black ink that reads "Brad Sam".

Mine Safety and Health Administration  
Office of Standards, Regulations, and Variances  
1100 Wilson Blvd., Room 2350  
Arlington, VA 22209-3939

May 4, 2006



RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

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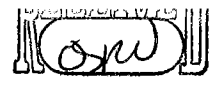
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*Greg Shepherd*



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A handwritten signature in black ink, appearing to read "Mike Helli". The signature is written in a cursive, somewhat stylized font and is positioned to the right of the typed name.

Mine Safety and Health Administration  
Office of Standards, Regulations, and Variances  
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*Robert A. Lewis*

May 4, 2006



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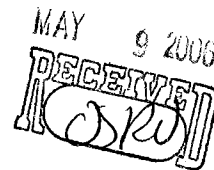
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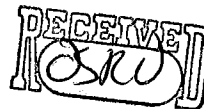
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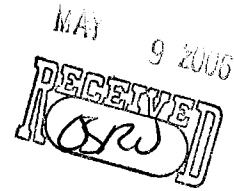
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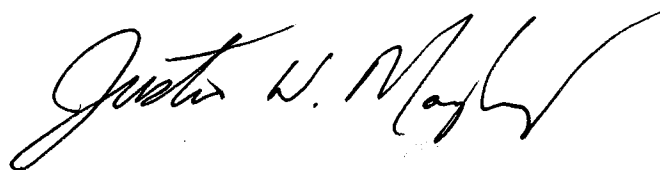
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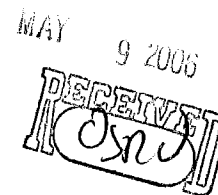
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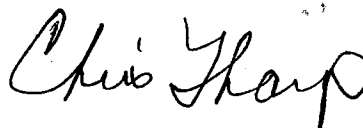
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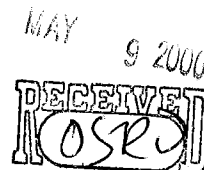
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Sincerely,



Miner for Vision Mining  
UMWA Local 6492



Mine Safety and Health Administration  
Office of Standards, Regulations, and Variances  
1100 Wilson Blvd., Room 2350  
Arlington, VA 22209-3939

May 4, 2006



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Mine Safety and Health Administration  
Office of Standards, Regulations, and Variances  
1100 Wilson Blvd., Room 2350  
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RECEIVED  
MSHA  
MAY 9 2006

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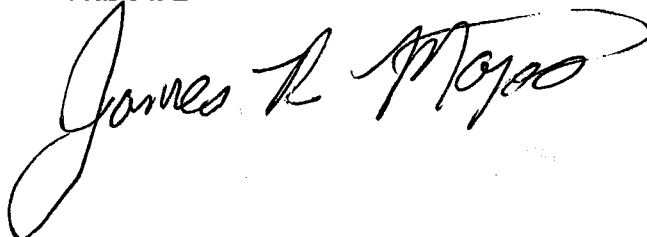
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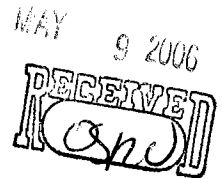
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Chris D. Brown

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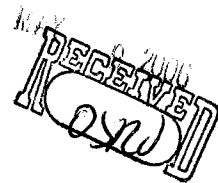
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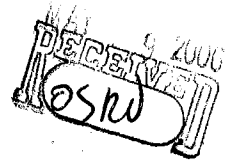
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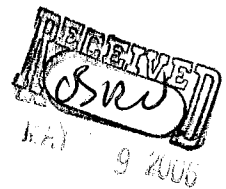
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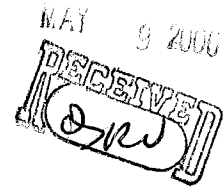
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Miner for Vision Mining  
UMWA Local 6492

Mine Safety and Health Administration  
Office of Standards, Regulations, and Variances  
1100 Wilson Blvd., Room 2350  
Arlington, VA 22209-3939

May 4, 2006



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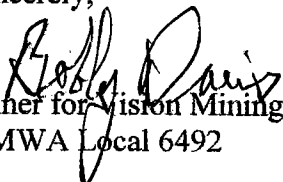
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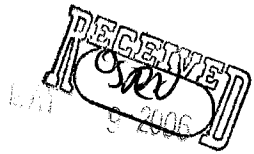
Sincerely,

*Blake Bondurant*

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Miner for Vision Mining  
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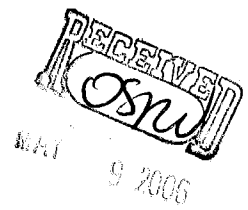
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Sincerely, *Lennie Pyles*

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UMWA Local 6492

*Anthony Harper*

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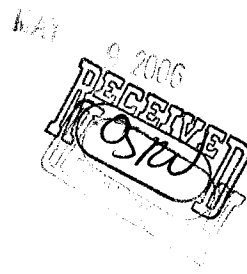
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Thank you for your attention to my concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronni J. Aliso". The signature is written in a cursive, flowing style.

Miner for Vision Mining  
UMWA Local 6492



Mine Safety and Health Administration  
Office of Standards, Regulations, and Variances  
1100 Wilson Blvd., Room 2350  
Arlington, VA 22209-3939

May 4, 2006



RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

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Miner for Vision Mining  
UMWA Local 6492

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Office of Standards, Regulations, and Variances  
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May 4, 2006

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RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

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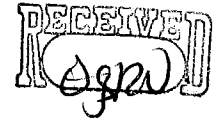
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*Raymond Parish*

Mine Safety and Health Administration  
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1100 Wilson Blvd., Room 2350  
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DEPT. OF LABOR  
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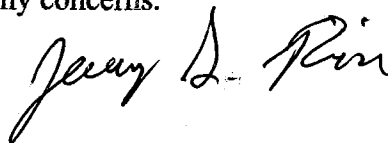
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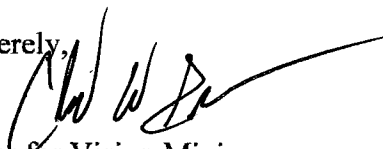
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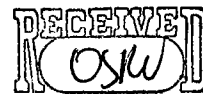
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Thank you for your attention to my concerns.

Sincerely,

Miner for Vision Mining  
UMWA Local 6492

Mine Safety and Health Administration  
Office of Standards, Regulations, and Variances  
1100 Wilson Blvd., Room 2350  
Arlington, VA 22209-3939

May 4, 2006



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UMWA Local 6492

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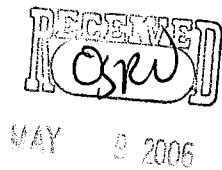
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UMWA Local 6492

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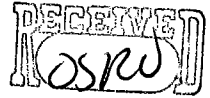
A handwritten signature in black ink that reads "Justin Hancock". The signature is written in a cursive, flowing style.

Miner for Vision Mining  
UMWA Local 6492



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A handwritten signature in black ink that reads "Harry W. Aushband". The signature is written in a cursive, flowing style.

Miner for Vision Mining  
UMWA Local 6492

Mine Safety and Health Administration  
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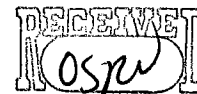
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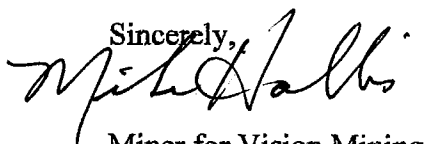
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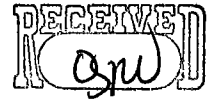
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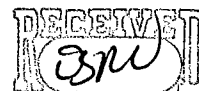
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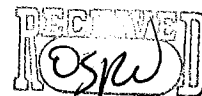
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UMWA Local 6492

Mine Safety and Health Administration  
Office of Standards, Regulations, and Variances  
1100 Wilson Blvd., Room 2350  
Arlington, VA 22209-3939

May 4, 2006



MAY 8 2006

RE: Comments to Emergency Temporary Standards, RIN 1219-AB46

Dear Sir or Madam:


I am an hourly miner employed by KMCC, LLC dba Vision Mining, a member of UMWA Local 6492 and am writing this letter to offer my comments on MSHA's Emergency Temporary Standards ("ETS"). First, I do not agree with the new training requirements. Current training does not require miners to physically travel the entire distance of the escapeway. In my experience, the current practice ensures that all miners are familiar with the primary and secondary escapeways. For example, when I go to work I travel one of the escapeways into the mine. I have not worked with anyone in the mines who did not know where the escapeways were located or which direction to travel. Requiring miners to participate in a physically exhausting practice drill does not increase safety. In fact, it may actually increase risk by making miners walk (or, in some cases, crawl) thousands of feet through the mine. At the very least, we should be allowed to travel the escapeway by mechanical means, rather than on foot.

I am also concerned about the "expectations" training mentioned in the ETS commentary, especially the suggestion that drills be practiced in smoke. No training should expose miners to smoke or other dangerous conditions. The risk, no matter how small, of actual injury is too great.

Third, since pumpers, examiners, fire bosses and others are not assigned to one location in the mine often travel through the mine on foot, I would suggest that the caches along the escapeways contain extra SCRS for these individuals. Otherwise, they may be required to actually carry an extra unit with them.

Finally, the ETS commentary suggests what is called the "heart rate" method to determine the appropriate distance for caches. I am very concerned about this suggested method. I do not believe it is practical, effective or reliable to expect those working underground to determine a "worst case scenario." This method requires a judgment about which miner appears to be the slowest to be able to evacuate. This could change day to day, depending on the employees, whether someone is injured or even whether one miner doesn't feel well on a particular day. Mining is physically demanding enough without asking one of our miners (especially one who is physically poorly suited) to engage in a physically demanding exercise. I understand that the height/distance chart contained in the MSHA Policy Manual has been adopted in West Virginia, and I would suggest that this chart or another objective standard be adopted.

Thank you for your attention to my concerns.

Sincerely, 

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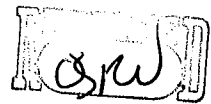
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