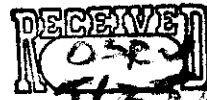


Comments Concerning Emergency Temporary  
Standard on Mine Evacuation

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on the request from MSHA concerning comments about whether miners should have the ability to tether themselves together during escapes thru smoke filled environments;

I feel that tethering; (A) 3-3½ ft in length should be required for each miner - sufficient in length to allow a little "cushion" for the different walking pace for individual miners. (B) The tethering should be stored with the SCSR's & readily available. (C) constructed of durable & reflective material. (D) be designed to securely fasten to the miner's belt.

MSHA's request for comments on alternative realistic emergency evacuation practices. I feel that for the best results the drill should require the same actions as if it were a real emergency such as (A) Donning SCSR's, using realistic mouth pieces (B) Tethering themselves together (C) Changing from one SCSR to another in a smoke filled environment.

MSHA's request for comments on methods of determining SCSR storage locations.

(A) I feel that the age & size of the miner should be taken into account by means such as the heart rate method or a combination that method & the 2,500 to 5,000 ft. requirement where the SCSR's would be stored at the shorter distance.

MSHA's request for comments on FSR's  
 I feel that they should be removed from all mines  
 & that SCSR's be required since the SCSR's produce  
 oxygen and provides more protection in contaminated  
 environments.

MSHA's request for comments on the appropriateness  
 of requiring operators to report the total number of  
 SCSR's in use at each mine, semi-annually.

I think it is very appropriate because (A) its  
 a way of keeping up to date on the number of units  
 available VS the number of miners at the mine.  
 (B) MSHA should also require the (1) manufacturer  
 (2) model (3) date of manufacturer (4) serial number  
 to be included in the report.

MSHA's request for comments on storage locations  
 that are readily accessible to pumper, outby crew's  
 & examiners. I think MSHA should consider some  
 kind of mobile storage unit for outby crews &  
 specific storage areas along all pumper & examiner  
 routes & require the storage areas for the pumpers  
 & examiner routes to be plotted on the escapeway  
 map.

MSHA's request for comments on reflective signs  
 for SCSR storage locations. I think the signs  
 should be made of reflective material and that the  
 SCSR's should be stored directly under the lifeline  
 so that anyone traveling down the lifeline in thick  
 smoke will have to travel over the SCSR's.

MSHA's request for comments on the reporting requirement of any SCSE used for emergency and where any SCSE did not function properly.

I think this should be required in order to properly evaluate each model & manufacturer.

This might also give a early warning of a defect in some SCSE's.

I also think MSHA should define "promptly" more clearly.

Herbert Cordell  
Chairman Safety Committee  
Local 2133 UMW