



September 14,2004

MSHA
Office of Standards, Regulations, and Variance
1100 Wilson Blvd
Room 2350
Arlington, VA 22201

Comments on MSHA Training Proposal for 30 CFR Part 48

RIN 1219-AB35

Shaft Drillers International (SDI) and its affiliates Zeni Drilling Company and North American Drillers, Inc. have constructed hundreds of blind drilled mine shafts over the last thirty years. Today we are the world's largest, most technologically advanced large diameter drilling organization. SDI does not perform raise drilling or conventional sinking. The work which SDI performs is generally done from the surface. SDI maintains some of the best safety records in the shaft construction business. The way in which SDI constructs shafts, is the safest available method of shaft construction.

SDI constructs shafts prior to mining using drilling rigs similar to an oilfield drilling rig but unique in that it can drill very large diameters, up to 20 feet. Typically a blind shaft drilling project will last from 3 to 6 months or more depending on the depth and diameter required.

While a shaft is being drilled, the shaft is filled with water to remove the cuttings with a reverse circulation process. Once the shaft is drilled it is normally lined with a cylindrical steel tube. The steel tubes are welded together in sections on the surface and are lowered into the shaft as one unit. Water is added into the steel tube to create ballast and allow the casing to sink into the shaft. Grout is then placed in the annulus from the bottom up and displaces the water as the space is filled. When the grout has reached the top and displaced the water, the installation is complete. The final step is pumping the

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water from inside the casing. Once the water is pumped out the shaft is ready to be put online.

Shaft construction work is not the same as underground mining or surface mining and the hazards inherent to shaft construction are different than those in surface or underground mining. SDI believes that subjecting surface construction workers to Part 48, subparts A and B is not feasible for the shaft construction industry as a whole and for our process in particular. The proposed training is not applicable for the firms which drill shafts from the surface and never send their workers into the shafts while the shaft is being drilled,

The surface construction workers who drill shafts should not be considered miners and should not have to go through the same training as miners. The reason the surface construction workers should not be considered miners is because they construct shafts entirely from the surface.

Because the shaft construction industry does have a significant amount of turnover, having inexperienced workers trained for 24 or 40 hours before beginning work would create significant time constraints on the deadlines for constructing shafts. Putting a large emphasis on pre-work training is not an effective way to provide training to surface construction workers and is unnecessarily costly. The best way to provide training is throughout the term of the project so the training can be reinforced through actual work experience.

When new employees are hired at SDI they are put through an 8 hour new miner training program. Once the employees have completed the new miner training, the superintendents and foreman then train the employees on the various tasks of different jobs. All new employees are closely supervised and are constantly trained on the different sequences of the shaft construction project

The training program for experienced SDI employees consists of 8 hours of annual training and countless types of on the job training. The training is focused on surface work such as material handling, heavy equipment movement, crane handling, mobile equipment and electrical safety. Training also includes time spent on methane hazards and detection. SDI believes these training needs are specific for the particular type of shaft which must be constructed. The reason for specific training is because no shaft which SDI constructs is completely the same.

The shaft construction industry needs to have an exact definition from MSHA on what is actually considered shaft construction. We believe that SDI constructs boreholes, not shafts and on that grounds shouldn't be included in the proposed rules. Over the years we have had widely different interpretations from various MSHA coal and metal/non-metal districts as to what constitutes a shaft. As part of the rulemaking process, a clear definition should be made.

Next, shaft construction workers which are experienced for at least 6 months during the 24 months preceding the effective date of the rule need to be grandfathered in

as experienced workers. In regards to experienced workers, orientation training for a newly hired experienced shaft construction worker would be sufficient to acquaint a worker with the operations and requirements of the project.

When it comes to new tasks, workers who are experienced or inexperienced should have training when assigned to a new task. All types of training should be provided by individuals qualified to provide training. Finally, all contractors would be required to keep written records of all training provided under Subpart C.

In conclusion, SDI believes the industry as a group needs to write a set of training guidelines and regulations which are specific to its needs and hazards. Simply put, if a surface construction worker never enters a shaft he or she should not be required to have the same training as underground miners. Regulations for blind drilled shafts need to be written in a separate Subpart C under 30 CFR Part 48.

Respectively,

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Attach: SDI - MSMA training Letter 9-14-04.doc
Subject: RIN 1219-AB35

Gentlemen,

Our comments on your proposed rule for Training Standards for Shaft and Slope Construction Workers at Mines are attached. We are also faxing these comments today.

We appreciate the opportunity to be involved in this process and welcome any questions you may have.

Best regards,

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