

I am Steve Thomas, Safety Manager for Gunther-Nash, Inc. of St. Louis, MO. I have 8 years of Construction Safety Experience and would consider myself a better than average trainer. I am qualified to instruct on more than a dozen different construction topics and am in the process of receiving MSHA Trainer Certification. A conservative estimate would be that in my 8 years of experience I have trained over 5,000 construction workers on various topics.

Gunther-Nash has been in business since 1967 and in that time has completed approximately 34 slopes and 56 shafts for the coal and metal/nonmetal mining industries. Constructed slopes have ranged from 150 feet to several thousand feet long and shafts of varying shapes have ranged from 100 feet to over two thousand feet deep. Additionally, numerous tunnels and other underground excavation projects have also been constructed and presently we are participating in a joint venture which is constructing a major sewer tunnel in St Louis, MO. Most of these projects have been located in the eastern part of the United States, but we have ventured as far west as Kansas City, MO. Since the beginning of the company, the core business has been mine construction and consisted mainly of shaft and slope construction. However, in recent years Gunther-Nash has diversified and is now providing construction services in the petrochemical, communications, food and beverage, power generation and other related fields. Although the number of employees on the Gunther-Nash payroll is increasing due to the diversification and additional opportunities for projects, the number of employees on the

payroll usually ranges from fifty to one hundred and fifty, depending upon the workload. The number of employees on a typical shaft or slope project usually peaks out at about forty when fully staffed. The duration of the projects can vary from a few months to a couple of years.

As I stated before, training our employees is a major part of my role as Safety Manager. I am an advocate for training. When it is done correctly, training is an integral piece of an effective Safety and Health program. However, training is not a cure all for perceived problems in our industry. In Gunther-Nash's current program, we give all newly hired employees an orientation pertaining to the work they are expected to do. Additionally we cover the parts of our Safety Program that they are expected to participate in. This normally takes 2-4 hrs depending on the complexity of the project. Providing they have successfully completed a drug screen they are allowed to go to work. But their training does not stop there. We have procedures in place that require supervisors to train employees every day. Prior to performing any task supervisors are required to go over a PHD, which is our version of a Job Safety Analysis, if there is equipment involved in their work they are task trained. Supervisors observe the employees while they are working and provide feed back and corrective actions. This does not occur only on the first day, but every day of the project. All supervisors are required to make written observations of the work in progress on a daily basis, and provide what corrective actions were taken. Most of these observations are geared toward employee behavior. In addition, SafeCard meetings are held every day to discuss that day's

operations, hazards, and how to overcome those hazards before work ever starts. As I said earlier I am an advocate for training, and feel this is an effective way to conduct training.

Studies show that the average person can listen with understanding for ninety minutes, but can only listen with retention for twenty minutes. Taking that into consideration, in an eight hour day of training, how much is the employee really retaining? The key to productive training is interval reinforcement over the life of the project.

As I understand it, the proposed regulations would require slope and shaft contractors provide a minimum of 40 hrs of training for every employee prior to the performance of work. This is based on a prudent and safety minded contractor's assumption that every employee on the project site may be required at some point to work underground and thus requiring training under 48-A.

40 hrs of training prior to starting work is not only inefficient, it is ineffective. When we start a shaft or slope project there may be a month or more lag time prior to the performance of any underground work. This is not the time to train personnel on topics such as ventilation systems or ground control, etc. They have to be covered in the new hire orientation, but it is my opinion that training for procedures and safeguards should be closer to the time these skills will be utilized.

Conducting 40 hours of training, with 8 hrs retraining annually, may be appropriate at an operating mine where

the conditions and workforce are relatively constant. However, Shaft and Slope workers, while facing several of the same hazards also face other differing hazards due to the construction activities they perform. Shaft and Slope workers face constantly changing conditions as they progress in performing their work and often experience a workforce that is constantly changing due to the nature of the work performed. These differences necessitate the need to have a training program which is conducive to the hazards to which the workforce is exposed. Shaft and Slope workers should have their own training program and not be merely included in other programs.

The proposed regulations leave many unanswered questions such as:

- How will state run programs respond to the new training regulations? Will Kentucky require 48 hrs of training? Will West Virginia require 80?
- Will a Coal Miner trained under part 48 A, really be qualified to work in Shaft and Slope? Will a Shaft and Slope worker with part 48 A training really be qualified to work in underground coal?
- What is the definition of a Shaft and Slope worker? Does this include such subcontractors as electricians helping set the sinking hoist, operators excavating and backfilling the slope open cut, ironworkers installing the mine fan over a completed shaft, etc.?

A review of the proposed Subpart C language from the summer of 1978 indicates that the authors recognized that construction work was separate and distinct from production mining activities. In reality, the proposed

section could have been broken into two separate subparts: one for shaft and slope workers and the other for construction workers engaged in the erection, alteration, repair, dismantling, or demolition of all structures, facilities, and equipment on mine property (with the exception of shaft and slope construction. The training programs which were proposed differed from the mandated courses in Subparts A and B to provide training that was directed at the type of work that was actually going to be performed. For example, shaft and slope workers were to be trained in the topic of Explosives while training in Cleanup and Rock Dusting was excluded.

For what ever reason Subpart C never came to fruition MSHA has again recognized that the Shaft/Slope industry has a need for up to date training regulations. Gunther-Nash and the industry support new training regulations which are developed for the work our employees perform. We stand ready to assist MSHA in the development of shaft and slope specific training content and implementation. In my opinion, a joint effort between MSHA and the industry is needed to develop meaningful and effective training for this specialized workforce.