

Comments of the United Mine Workers of America
On the Proposed Extension of Information Collection; Training Plan Regulations and
Certificate of Training
November 21, 2017
[MSHA Docket Number 1219-0009]

MSHA indicates that this proposal is part of the Department of Labor's continuing effort to reduce paperwork and respondent burden in accordance with the requirements of the Paperwork Reduction Act of 1995. This proposal provides the general public and Federal Agencies with an opportunity to comment on proposed and/or continuing collections of information to ensure that requested data can be provided in the desired format, reporting burden is minimized, collection instruments are clearly understood, and the impact of collection requirements on respondents can be properly assessed.

The Mine Act recognizes that education and training is an important element of federal efforts to make the nation's mines safe. Title 30, CFR Sections 48.3 and 48.23 require training plans for underground and surface mines, respectively. The standards are intended to assure that miners will be effectively trained in matters affecting their health and safety, with the ultimate goal being the reduction of injuries and illness in the nation's mines. Training plans are required to be submitted for approval to the MSHA District Manager for the area in which the mine is located.

Plans must contain:

- The company name, mine name, and MSHA identification number of the mine.
- The name and position of the person designated by the operator who is responsible for health and safety training at the mine.
- A list of MSHA approved instructors with whom the operator proposes to make arrangements to teach the courses and the courses each instructor is qualified to teach.
- The location where training will be given for each course.
- A description of the teaching methods and the course materials which are to be used in training.
- The approximate number of miners employed at the mine and the maximum number who will attend each session of training.
- The predicted time or periods of time when regularly scheduled refresher training will be given including the titles of courses to be taught, the total number of instruction hours for each course, and the predicted time and length of each session of training.

For new task training:

- A complete list of task assignments.
- The titles of personnel conducting the training.
- The outline of training procedures used.
- The evaluation procedures used to determine the effectiveness of the training.

Records of training are required for underground and surface mines under sections 48.9 and 48.29.

The Agency is interested in comments that:

- Evaluate whether the collection of information is necessary for the proper performance of the functions of the agency, including whether the information has practical utility;
- Evaluate the accuracy of the MSHA's estimate of the burden of the collection of information, including the validity of the methodology and assumptions used;
- Suggest methods to enhance the quality, utility, and clarity of the information to be collected; and
- Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

UMWA COMMENT

This is vital information that is necessary for the proper performance of the functions of the agency, including the protection of health and safety of miners. This information is an integral part of ensuring the safe protection of our miners and must be maintained. This information is not a burden on the industry and is a very vital part of the overall safety of the operation and their employees. These sections of the code spell out what must be contained in the training plan of a mine. The training plan is central to seeing that miners are properly trained in all aspects central to health and safety in the mine in which they work. The training plan covers such topics as roof control, ventilation, escape, maps, self-rescuers, mine gases, and hazard recognition to name a few. These are all essential to operating a safe coal mine with well-trained miners. Miners are taught how to escape in the event of an emergency and as a last resort how to barricade themselves in refuge chambers. All of this is essential safety knowledge the miner must know in the event of an emergency.

The mine site should have one hard copy of the plan available to those who want to review it, however, we would have no problem with these plans being submitted to MSHA electronically for approval. A copy of the plan should also be stored electronically at the mine site and made available to those who want to review it. These requirements should not be considered a "paperwork burden", is necessary for the proper performance of the functions of the agency, and does have practical utility.

We recommend that all of this information continue to be reported and recorded as has been in the past.