

SLAM Risks

Coal and Metal/Nonmetal Fatalities

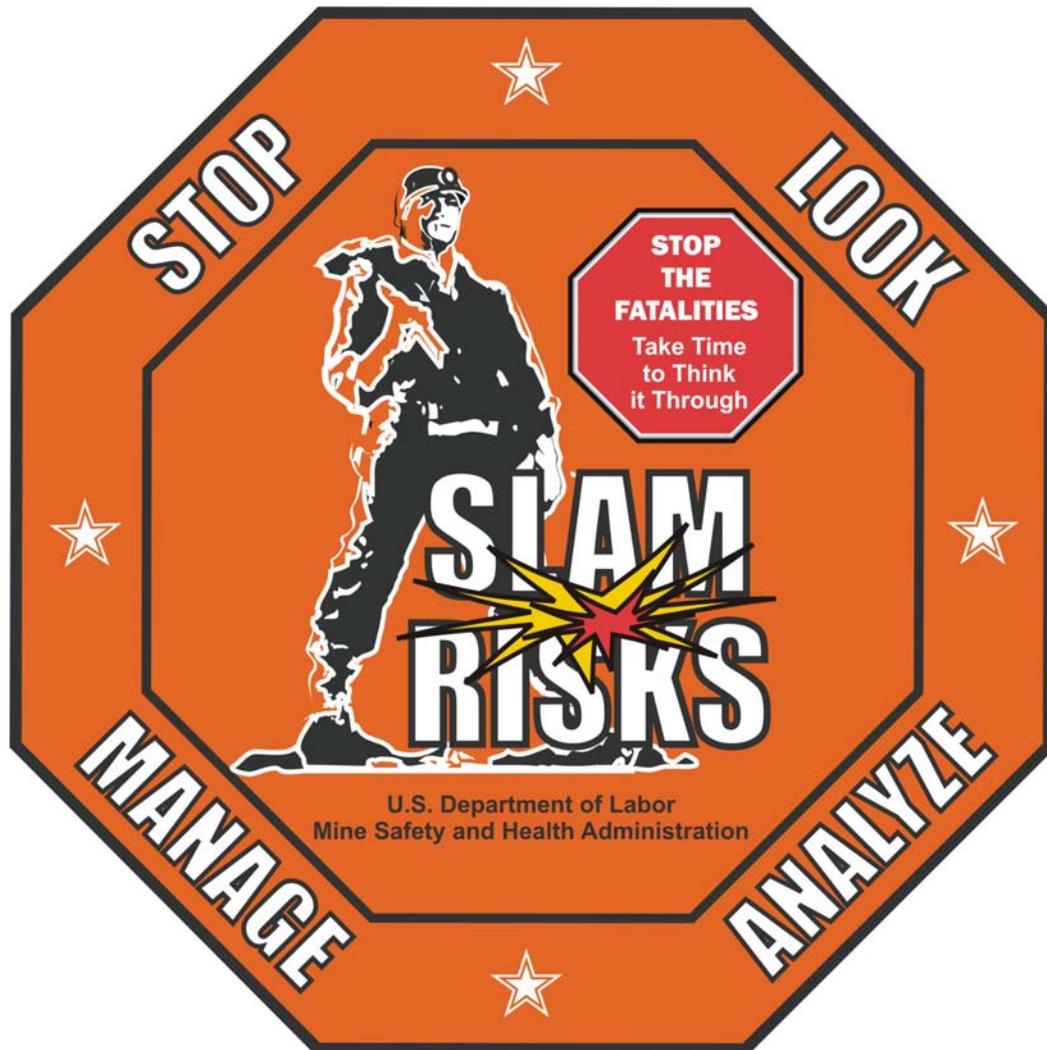
January – June 2008



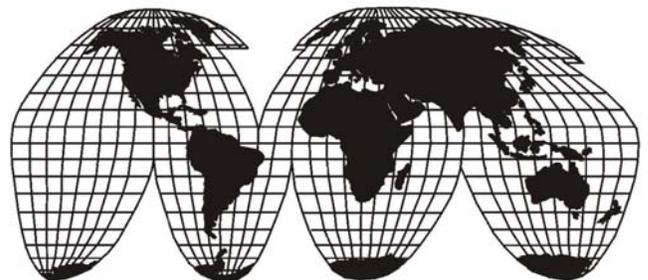
U.S. Department of Labor
Mine Safety and Health Administration
National Mine Health and Safety Academy

Other Training Materials
OT 10-08-2

2008



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U.S. Department of Labor
Elaine L. Chao
Secretary

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Introduction

This SLAM Risks program is primarily intended to be used by trainers as introductory materials for risk assessment training. It can also be used when conducting safety training, tool box safety sessions, safety meetings, etc. The information in this program should help make the participant more aware of how risk assessment impacts the everyday tasks that are performed in the mining industry.

The materials in this publication include a description of the accident and a photograph of the accident scene. Each page includes a SLAM Risks chart that the trainee/participant can use to determine the hazards, risks, and preventive actions that can help to reduce or eliminate the risks of the particular accident that occurred.

You may want to logon to the Mine Safety and Health Administration's home page at www.msha.gov for additional accident information. Click on MSHA's Data Retrieval system under Statistics in the bottom right hand column, type in a mine name and/or a mine identification number, and retrieve other accidents that can also be used as examples for this training.

The fatalities included in this publication cover some of the accidents that occurred in coal and metal and nonmetal mining from January 1 to June 30, 2008.

DISCLAIMER

The fatalities included in this publication are intended to be used as an exercise to learn and apply the concepts of the SLAM Risks process. The information in this publication is not intended to establish fault or to place blame on anyone involved in these accidents. These fatalities are based on preliminary fatality reports, which may change after a formal accident investigation is conducted.

Risk Analysis

SLAM Risks is about risk assessment and the prevention of mining accidents. There is a need to be aware of the risks of an accident before doing a mining job. It may not always be obvious that a workplace task could lead to an accident. This is why a risk assessment is conducted. It's important to remember that over time a mine setting seldom remains unchanged. Risks need to be assessed whenever procedures or processes change, whenever starting new tasks, or performing non-routine tasks.

REMEMBER – ACCIDENTS HAPPEN WHEN HAZARDS ARE NOT IDENTIFIED AND CORRECTED OR CONTROLLED.

Most, if not all, mining fatalities can be prevented. A risk assessment is one method that can assist in the prevention efforts. At the heart of any mining activity should be a risk assessment. **RISK ASSESSMENT IS A SIMPLE PROCESS, WITH A BIG EFFECT, TO IDENTIFY AND CONTROL HAZARDS.**

How to Use the Materials in this Publication

You might want to choose fatalities either in coal or metal/nonmetal, depending upon your mining operation. If you represent a coal mine you might find that a metal/nonmetal fatality can apply to your operation and conversely if you represent a metal/nonmetal mine you might find a coal fatality that can apply to your operation.

- Read the accident/fatality description.
- Review the photograph.
- After a brief discussion, the participant might want to look at the SLAM Risks chart at the bottom of each sheet. The chart is provided to allow the participant to think about the hazards as they might apply to your operation. Review the following:

What are the **hazards**?

In risk assessment the words **hazards** and **risks** are often used. **Hazards and risks are not the same thing.**

A **hazard** is anything that has the potential to cause harm. The tasks included in each of the fatalities that you review might have several hazards.

What are the risks?

A **risk** is the likelihood that illness, injury, or even death might result because of the hazard. Even though all of the accidents in this publication involve fatalities, not all of the risks may have been considered a high hazard. We have to consider the combination of all of these factors that lead up to the fatality. Consider how likely it is that the hazard could cause harm and think about the severity and consequences of the harm. You must make a judgment as to whether or not the risk is significant and more should be done to reduce it. The aim is to eliminate the risk.

EXAMPLE:

Let's consider a guard removed from a piece of equipment. Of course this is a **hazard**, but we must also consider **risk**. What is the likelihood that this will cause an accident? Even if a miner is not in the area, the **hazard** of the unguarded equipment is still present. Although the **risk** might be low, the hazard potential still remains. We must be 100 percent sure that everything is done to prevent the accident. Having a guard in place will ensure the safety of the miner.

How would you prevent or decrease the risks?

Finally, let's consider what steps can be taken to protect the miner from the potential hazards and risks that you listed. This would be the last column of the SLAM Risks chart. In this column, you must consider what steps you would take to prevent or decrease the risk. There may be many steps that can be listed in this area.

REMEMBER, the SLAM Risks process is nothing more than a quick survey of what in a task could cause harm to yourself or the people working with you or the people in the area. This will help determine whether you have taken enough precautions or should do more to prevent harm.

The mining environment is ever-changing. Let's say that you have been performing maintenance. After shutting down welding/cutting torches, putting your tools back into the bucket, unplugging a drill motor and so forth, you come to the end of your shift. The next day when you return, your work area could have changed. Take a few moments to look around and examine the area for any hazards that you either noticed earlier or have been created since you were there last. If you jump back into the task you were performing, you may find out that the environment has changed and new, unexpected hazards have developed. This is what SLAM Risks is about. Take a few moments to look around and examine the area for any hazards.

Ask yourself questions like:

- Can I or someone else come in **CONTACT WITH** an energy source or hazardous material?
- Can I or someone else be **STRUCK BY** anything?
- Can I or someone else **STRIKE AGAINST** anything?
- Can I or someone else be **CAUGHT IN, ON OR BETWEEN** anything?
- Can I or someone else **SLIP, TRIP, OR FALL**?
- Is there a possibility that I or someone else can **SPRAIN, STRAIN**, or suffer from **OVEREXERTION** by doing the task?

Although this program is intended for you to prevent the accidents at your mining operation, the accidents in this publication should help the participant to become aware of the SLAM Risks process. The best practices are listed on the page following each photograph. These are the best practices listed in the preliminary fatality information. These best practices can be discussed and may help you to consider areas of prevention that might apply at your mining operation.



SLAM
Coal Fatality-KY

On January 8, 2008, a 29-year-old truck driver with three years experience was fatally injured while attempting to dump spoil. The truck over-traveled the edge of the dump and rolled down the spoil slope approximately 140 feet.

STOP	◆	LOOK	◆	ANALYZE	◆	MANAGE
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What are the hazards?	How high would the risks be?	How would you prevent or decrease the risks?
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After you **SLAM** the risks involved in this accident, look at the best practices, on the next page, that were found when this accident was investigated. **DID YOU COVER THESE CONTRIBUTING FACTORS?**



Best Practices Listed in the MSHA Fatalgram

- Provide and maintain adequate berms and other barriers of mid-axle height for dump sites.
- Routinely monitor work habits and examine work areas to ensure that safe work procedures are followed.
- Ensure equipment operators receive proper task training.
- Ensure work areas and dump sites are properly illuminated at night.
- Conduct pre-operational checks of equipment before placing into operation.
- Use seat belts when operating equipment.



Best Practices Listed in the MSHA Fatalgram

- Never work or position yourself near or under dangerous highwalls or banks.
- Promptly correct or post unsafe ground conditions.
- When unsafe ground conditions are found during on-shift examinations and are being corrected, notify all persons working in the area of the hazard and post the affected area until the unsafe condition is corrected.
- Do not work or position yourself between equipment and the highwall such that equipment may hinder escape from falls or slides.



SLAM
Metal/Nonmetal Fatality-CA

On January 21, a 58-year-old contractor truck driver with 3½ years experience was fatally injured at a cement operation. He was found on the ground behind the rear tires of a bulk cement truck that was located at a truck access rack. Truck drivers used this facility to access the hatches on the top of the trucks. Although there were no eyewitnesses, the victim's injuries were consistent with a fall from an elevated location.

STOP	◆	LOOK	◆	ANALYZE	◆	MANAGE
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What are the hazards?	How high would the risks be?	How would you prevent or decrease the risks?
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After you **SLAM** the risks involved in this accident, look at the best practices, on the next page, that were found when this accident was investigated. **DID YOU COVER THESE CONTRIBUTING FACTORS?**



Best Practices Listed in the MSHA Fatalgram

- Discuss work procedures; identify all potential hazards; and ensure the job is done safely. (SLAM) Stop, Look, Analyze, and Manage.
- Train all miners to recognize hazards from falling and ensure that safe work procedures are discussed and established.
- Ensure that persons wear fall protection where there is a danger of falling.
- Establish traffic patterns that ensure safe alignment of vehicles with access equipment.



Best Practices Listed in the MSHA Fatalgram

- Always wear a life jacket where there is a danger of falling into the water.
- Set up a communications schedule with others when persons work alone.
- Ensure that a dredge has hand rails, of substantial construction and height, to prevent persons from falling overboard.



Best Practices Listed in the MSHA Fatalgram

- Review maintenance procedures to ensure all possible hazards have been identified and appropriate controls are in place to protect persons. Stop, Look, Analyze, and Manage (SLAM) each task.
- Establish policies to ensure that barricades or warning signs are installed to prohibit access and protect persons from falling object hazards.
- Ensure that persons are removed when work is being performed overhead.
- Keep workplaces clean and free of spillage.



SLAM
Metal/Nonmetal Fatality-NV

On January 26, 2008, a 43-year-old equipment operator with 8 years experience was fatally injured at an underground gold mine. The victim parked his haul truck near an intersection of the loading area and left. A short time later, another miner got in the parked truck to move it out of the way. When this driver was backing the truck, it struck the victim as he was returning to his truck.

STOP	♦	LOOK	♦	ANALYZE	♦	MANAGE
What are the hazards?		How high would the risks be?		How would you prevent or decrease the risks?		
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After you **SLAM** the risks involved in this accident, look at the best practices, on the next page, that were found when this accident was investigated. **DID YOU COVER THESE CONTRIBUTING FACTORS?**



Best Practices Listed in the MSHA Fatalgram

- Ensure all miners are trained to recognize workplace hazards, specifically the hazard of mobile equipment traveling near them.
- Before moving mobile equipment, look in the direction of travel, be certain no one is in the intended path, sound the horn to warn possible unseen persons, and wait to give them time to get to a safe location.



SLAM Coal Fatality-AL

On February 1, 2008, a 34-year-old field mechanic (contractor) with 13 years experience was fatally injured while troubleshooting a diesel engine on a bulldozer. A valve cover, rocker assembly, and fuel injector had been removed from the cylinder head. The victim was observing the valve lifters while the engine was turned over to place the lifters in a better position for retrieval. The victim was struck and fatally injured by material expelled from the cylinder head as the engine was cranked.

STOP	◆	LOOK	◆	ANALYZE	◆	MANAGE
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What are the hazards?	How high would the risks be?	How would you prevent or decrease the risks?
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After you **SLAM** the risks involved in this accident, look at the best practices, on the next page, that were found when this accident was investigated. **DID YOU COVER THESE CONTRIBUTING FACTORS?**



Best Practices Listed in the MSHA Fatalgram

- Always wear eye protection when working near moving parts.
- Follow equipment manufacturer's protocols and procedures when working on equipment.
- Move to a safe location when there is a danger of high-pressure releases of fluids or objects.
- Always use the proper tools, parts, and equipment to safely perform the work.



SLAM
Coal Fatality-PA

On February 18, 2008, a 51-year-old outside service technician (contractor) with one year of experience was fatally injured while placing concrete barriers along a mine access road. A rubber-tired boom truck was being used to move the concrete barriers into place. The victim was electrocuted while standing on the ground, touching a suspended concrete barrier, when the boom came in contact with an energized 14,500 volt overhead power wire. The operator of the boom truck was treated and released.

STOP	◆	LOOK	◆	ANALYZE	◆	MANAGE
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What are the hazards?	How high would the risks be?	How would you prevent or decrease the risks?
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After you **SLAM** the risks involved in this accident, look at the best practices, on the next page, that were found when this accident was investigated. **DID YOU COVER THESE CONTRIBUTING FACTORS?**



Best Practices Listed in the MSHA Fatalgram

- Ensure that booms or masts of equipment are not operated within 10 feet of any energized overhead power line.
- Identify hazards associated with tasks prior to work assignments.
- Ensure that one person on the ground is designated to give signals to the crane operator and watch placement and proximity of the mast.
- Use non-conducting tag lines to steady loads when operating cranes where overhead power lines are present.



SLAM
Coal Fatality-PA

On February 25, 2008, a 50-year-old surveyor (contractor) with 8 years of total experience was fatally injured while surveying in an active underground continuous mining machine section. The victim was struck by a loaded shuttle car as it traveled through a run-through check curtain.

STOP	♦	LOOK	♦	ANALYZE	♦	MANAGE
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What are the hazards?	How high would the risks be?	How would you prevent or decrease the risks?
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After you **SLAM** the risks involved in this accident, look at the best practices, on the next page, that were found when this accident was investigated. **DID YOU COVER THESE CONTRIBUTING FACTORS?**



Best Practices Listed in the MSHA Fatalgram

- Never position yourself in an area or location where equipment operators cannot readily see you.
- Before operating mobile equipment, always ensure that other miners are not in the area of your intended travel.
- Sound warnings when the operator's visibility is obstructed, such as when making tight turns, reversing direction, or approaching curtains.
- Wear reflective clothing to ensure high visibility when necessary to walk or work in the area of moving equipment.
- Perform surveying at times when the section is not in production.



SLAM Metal/Nonmetal Fatality-WI

On February 25, 2008, a 62-year-old manager with 28 years experience was fatally injured at a surface sand and gravel operation. He was using an excavator to free a dragline from an ice-covered pit floor. The excavator broke through the ice as it traveled over an ice-covered, 10 feet deep ditch towards the dragline. The victim was ejected and was recovered from the water about six hours after the accident.

STOP	◆	LOOK	◆	ANALYZE	◆	MANAGE
What are the hazards?		How high would the risks be?		How would you prevent or decrease the risks?		
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After you **SLAM** the risks involved in this accident, look at the best practices, on the next page, that were found when this accident was investigated. **DID YOU COVER THESE CONTRIBUTING FACTORS?**



Best Practices Listed in the MSHA Fatalgram

- When conditions change, examine travelways to evaluate hazards. If the safety of travelways can't be positively determined, do not travel on them.
- In locations where travelways are not clearly distinguishable, install barriers, markers, or other warning devices to aid equipment operators, limit travel of mobile equipment, and inform mobile equipment operators of potential hazards.
- Stop, Look, Analyze, and Manage, SLAM each task to identify all potential hazards. Initiate action to protect yourself when performing every task.
- Wear seat belts when operating self-propelled mobile equipment.



SLAM Coal Fatality-WV

On March 12, 2008, a 47-year-old mechanic/contractor with 21 years experience was fatally injured while attempting to remove a front guard assembly (belly pan) from a bulldozer. The victim was positioned beneath the bulldozer, removing mounting bolts from the bulldozer guard. The guard was supported by a chain attached to a remote-operated truck-mounted crane. As the bolts were removed, the chain support slipped and the guard fell.

STOP	◆	LOOK	◆	ANALYZE	◆	MANAGE
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What are the hazards?	How high would the risks be?	How would you prevent or decrease the risks?
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After you **SLAM** the risks involved in this accident, look at the best practices, on the next page, that were found when this accident was investigated. **DID YOU COVER THESE CONTRIBUTING FACTORS?**



Best Practices Listed in the MSHA Fatalgram

- Always follow the equipment manufacturer's recommended maintenance procedures when conducting repairs to machinery.
- Install blocking materials before mounting bolts are removed from machinery components which may fall during disassembly.
- Conduct training for miners assigned to new work tasks to ensure they are aware of the health and safety aspects and safe work procedures related to the assigned tasks.



SLAM Coal Fatality-PA

On April 18, 2008, a 43-year-old continuous miner operator with 3½ years experience was fatally injured while operating a continuous miner with an attached mobile bridge conveyor system. As the victim was positioning the continuous miner in a crosscut turning right, the inby mobile bridge operator felt an unusual bouncing of the bridge and failed to get a radio response from the miner operator. The bridge operator shut the system down using the emergency stop switch and crawled toward the face and discovered the victim pinned between the basket of the bridge and the left rib.

STOP	◆	LOOK	◆	ANALYZE	◆	MANAGE
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What are the hazards?	How high would the risks be?	How would you prevent or decrease the risks?
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After you **SLAM** the risks involved in this accident, look at the best practices, on the next page, that were found when this accident was investigated. **DID YOU COVER THESE CONTRIBUTING FACTORS?**



Best Practices Listed in the MSHA Fatalgram

- Frequently review, retrain, and discuss avoiding the **"RED ZONE"** areas when operating or working near a remote controlled continuous mining machine.
- Follow established safe work practices and provide periodic training along with checks to ensure that the safe work practices have been properly implemented.
- Pursue new technology such as proximity detection to protect personnel and eliminate accidents of this type.
- Minimize the number of miners working or traveling near operating systems and maintain an effective means of communications between miners and system operators.



Best Practices Listed in the MSHA Fatalgram

- Design and utilize mining methods that will maintain stability and control the ground in places where persons work or travel.
- Examine and test ground conditions in areas where work is to be performed prior to work commencing and as ground conditions warrant during the shift.



Best Practices Listed in the MSHA Fatalgram

- Conduct a thorough visual examination of the roof, face, and ribs immediately before any work is performed and thereafter as conditions warrant.
- Be alert to any change of roof conditions.
- Identify and remove loose roof material from a safe position.
- Mine personnel not essential to the specific activity should remain outside the work zone.



SLAM Metal/Nonmetal Fatality-IA

On April 24, 2008, a 48-year-old laborer with 32 weeks experience was fatally injured at an underground industrial sand mine. The victim was checking the roof and ribs for scaling when she was struck by a front-end loader as it backed up.

STOP	◆	LOOK	◆	ANALYZE	◆	MANAGE
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What are the hazards?	How high would the risks be?	How would you prevent or decrease the risks?
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After you **SLAM** the risks involved in this accident, look at the best practices, on the next page, that were found when this accident was investigated. **DID YOU COVER THESE CONTRIBUTING FACTORS?**



Best Practices Listed in the MSHA Fatalgram

- Before moving mobile equipment, look in the direction of travel, be certain no one is in the intended path, sound the horn to warn possible unseen persons, and wait to give them time to get to a safe location.
- Ensure all miners are trained to recognize workplace hazards, specifically the limited visibility and blind areas inherent to operation of large equipment and the hazard of mobile equipment traveling near them.
- Supervisors should regularly monitor work practices, especially those of new miners, and reinforce the importance of safe work practices and take immediate action to correct unsafe conditions or work practices.
- Wear reflective clothing to ensure high visibility when necessary to walk or work in the area of moving equipment.
- Correct any defects that may affect the safe operation of self-propelled mobile equipment.
- Contact the manufacturer to discuss their recommendations before attempting to free wedged material.
- Train persons in safe work procedures and ensure they are provided with the appropriate tools or equipment to safely perform the task.
- Review maintenance procedures to ensure all possible hazards have been identified and appropriate controls are in place to protect persons.
- Remember and use SLAM: Stop, Look, Analyze, and Manage.



Best Practices Listed in the MSHA Fatalgram

- Examine working places, identify hazards, and assess and control risks. Be alert to changing conditions. Maintain a safe distance from the edge of excavations and slopes. If the safety of travelways cannot be positively determined, do not travel on them.
- Where hazards in travelways are not clearly distinguishable or immediately obvious, install barriers, markers, or other warning devices to aid equipment operators and limit travel of mobile equipment.
- Ensure all miners are trained to recognize workplace hazards, specifically the limited visibility inherent to the operation of large equipment.
- Wear seat belts when operating self-propelled mobile equipment.



SLAM Coal Fatality-WV

On May 16, 2008, a 24-year-old electrician with 4 years mining experience was fatally injured when he cut into an energized shuttle car trailing cable. The victim was attempting to make an electrical repair on the shuttle car when he used a cable cutter tool to cut into an energized lead.

STOP	◆	LOOK	◆	ANALYZE	◆	MANAGE
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What are the hazards?	How high would the risks be?	How would you prevent or decrease the risks?
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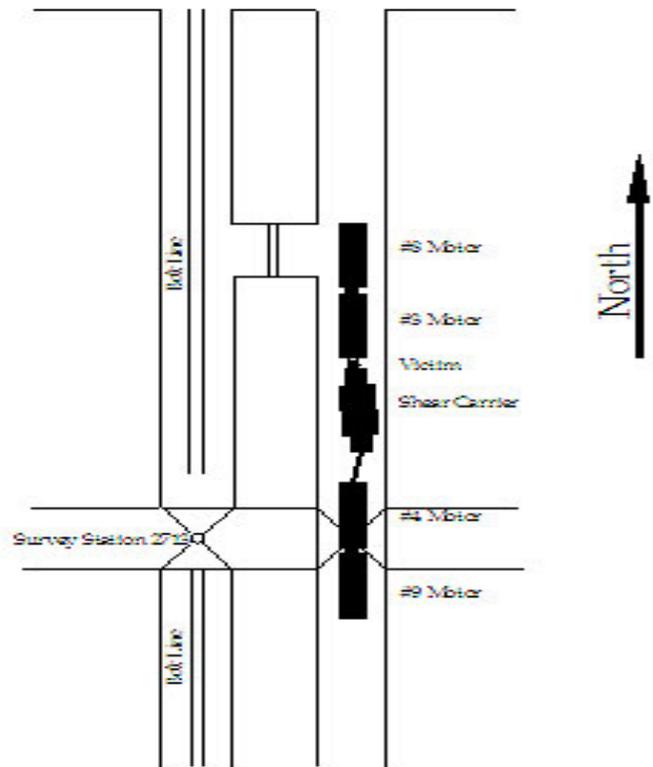
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After you **SLAM** the risks involved in this accident, look at the best practices, on the next page, that were found when this accident was investigated. DID YOU COVER THESE CONTRIBUTING FACTORS?



Best Practices Listed in the MSHA Fatalgram

- Personally lock-out and tag-out electrical circuits before you perform electrical work on a cable or component.
- Do not rely on anyone else to deenergize or disconnect a circuit.
- Maintain multiple locks and tags available to lock circuits.
- Maintain electrical meters and testing instruments in good condition to verify that the circuit is deenergized before beginning work.
- Communicate your intentions to work on an electrical circuit to ensure the circuit is, and remains, protected.



Best Practices Listed in the MSHA Fatalgram

- Never place yourself between rail cars/equipment unless positive stop blocks are in place.
- Always set parking brakes when getting off mobile track equipment.
- Pull, do not push rail cars.
- Always be aware of your location in relation to mobile equipment.



Best Practices Listed in the MSHA Fatalgram

- SLAM Risks (Stop, Look, Analyze, and Manage). Establish and discuss safe work procedures. Identify and control all hazards. Ensure the job is done safely.
- De-energize and lock out all components of portable crushers before performing work even if the task is brief.
- Guard or shield crushers to protect persons against flying or falling materials.
- Train all persons to recognize fall hazards.



Best Practices Listed in the MSHA Fatalgram

- Wear seat belts whenever operating mobile equipment.
- Maintain berms at least mid-axle height on the largest piece of equipment using a roadway.
- Visually inspect dumping locations prior to beginning work and as changing conditions warrant.
- Dump loads a safe distance back from the edge of a stockpile if it is suspected the ground may fail to support mobile equipment.
- Do not dump at the top of a stockpile while material is being loaded out below or near the edge of over-steepened stockpile faces.
- Maintain stockpile slopes at the angle of repose.



Best Practices Listed in the MSHA Fatalgram

- Remain a safe distance from moving equipment until it has passed.
- Walk behind moving mobile equipment when traveling in the same entry.
- When operating mobile equipment, ensure that other workers are in a safe area before moving the equipment.
- When necessary to walk or work in the area of moving mobile equipment, wear reflective clothing to ensure a high visibility.
- Always assume the mobile equipment operator has not seen you unless eye contact is confirmed.



Best Practices Listed in the MSHA Fatalgram

- Examine and test ground conditions in areas where work is to be performed prior to work commencing and as ground conditions warrant during the shift.
- When ground conditions create a hazard to persons, install ground support before other work is permitted in the affected area.
- Be alert to any change of ground conditions.
- Identify and scale loose ground from a location which will not expose persons to falling material.



SLAM Coal Fatality-IN

On June 3, 2008, a 25-year-old roof bolting machine operator with 2 years mining experience was fatally injured by a fall of roof. A rock measuring approximately 5' in length x 11' in width and 0" to 10" in thickness fell from beyond permanent support and cantilevered outby striking the bolter operator and pinning him between the foot cylinder of the pressurized ATRS.

STOP	◆	LOOK	◆	ANALYZE	◆	MANAGE
What are the hazards?		How high would the risks be?				How would you prevent or decrease the risks?
		H	M	L		
		H	M	L		
		H	M	L		
		H	M	L		
		H	M	L		
		H	M	L		
		H	M	L		
		H	M	L		
		H	M	L		
		H	M	L		
		H	M	L		

After you **SLAM** the risks involved in this accident, look at the best practices, on the next page, that were found when this accident was investigated. **DID YOU COVER THESE CONTRIBUTING FACTORS?**



Best Practices Listed in the MSHA Fatalgram

- Never travel inby supported areas.
- Always conduct a thorough visual examination of the roof, face and ribs immediately before work is performed and thereafter as conditions dictate.
- Always stay alert for changing conditions in your work area.
- Scale any loose or hazardous roof material using proper equipment and scale from a safe location.
- Know and follow the approved roof control plan.



Best Practices Listed in the MSHA Fatalgram

- Examine the area around the tree to be cut for hazards from previously felled trees, vines, underbrush, etc.
- Ensure that a clear escape route is present at a 45-degree angle away from the tree.
- Always make an open face (notch) cut in the direction the tree should fall. This cut should be of adequate depth (25% of tree diameter) and the two cut angles should total 90 degrees.
- Use bore cutting whenever possible, leaving a hinge equaling 10% of the tree diameter to guide the fall of the tree and hold it to the stump during the majority of the tree's fall.
- The final cut should be level.
- Chainsaw bar should be of sufficient length to reach through the diameter of the tree.



Best Practices Listed in the MSHA Fatalgram

- Apply sand to mine rails to ensure locomotive operators can safely stop.
- Ensure locomotives are coupled to each end of the trip to maintain control of the load.
- Ensure the weight of the load being transported does not exceed the braking capacity of the haulage equipment.
- Always conduct an adequate pre-operational examination of haulage equipment prior to use.



Best Practices Listed in the MSHA Fatalgram

- Never travel inby supported areas.
- Always conduct a thorough visual examination of the roof, face and ribs immediately before work is performed and thereafter as conditions dictate.
- Always stay alert for changing conditions in your work area.
- Scale any loose roof material using proper tools and scale from a safe location.
- Know and follow the approved roof control plan including the approved pillaring procedures.

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www.dol.gov**

