

From: Charlie Jones
To: [zzMSHA-OSRVRRegulatoryReform](#)
Subject: Standards that should be amended
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.15005 Safety Belts and Lines

Who uses safety belts anymore? This standard is too vague, such as "Danger of falling." . Anyone can fall anywhere. Walking across a flat floor could put someone in danger of falling. The standard should be more specific about heights and conditions..

.15020 Life jackets and belts

Similar to the safety belt standard. It needs to be more specific.

.14100 Safety defects; examination, correction and records

The enforcement of this standard has gotten out of hand. Citations should not be written for defects that are found before a pre-shift inspection is done. Lights, valves etc can fail when the machine is sitting overnight.

.14101 Brakes

Parking brakes on haul trucks should not be tested on the maximum grade with a full load. Trucks are not designed to be parked in that manner.

Why are front end loaders tested with an empty bucket and haul truck loaded? This needs to be amended.

.13010 Reciprocating type air compressors

No compressors of the type and over 10 HP are equipped by the manufacturer with automatic temperature-actuated shutoff devices. I don't see the need or purpose for this in a modern compressor.

.15001 First-aid materials

This standard needs to be modernized. If a surface mine is within a few minutes of a rescue or ambulance service. I see no need for a stretcher. This just promotes moving the patient. That should not be done unless he is in further danger. One of our operations only employs one miner. Can he carry himself on a stretcher?

The part 46 training regulations were meant to be more flexible than the part 48. They are in the training itself. The paperwork requirements for part 46 are very inflexible. Why not have a certificate that states everything was taught per the standard and have the trainer sign it? That's the way most any education facility does it.

Lastly: Repeal any standard that cannot be connected to a fatality or serious injury in the last 50 years. Get rid of standards that are outdated and serve no useful purpose.

Respectfully,
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