



November 15, 2018

David G. Zatezalo, Assistant Secretary of Labor
Mine Safety and Health Administration

Dear Mr. Zatezalo:

Re: Respirable Dust – Other Designated Occupations at Castle Valley Mining LLC

This letter is in response to the “Other Designated Occupations” (ODO) that were established during the Respirable Dust Reform Initiative. At Castle Valley Mining Complex ODOs were established on all the roof bolters on all MMUs. This designation requires 15 valid samples per quarter in each MMU.

In the regulation CFR 30 part 70.208(b)(3) it states “Continuous mining section other than auger-type. DO-The continuous Mining (CM) machine operator or mobile bridge operator when using continuous haulage; ODO-The roof bolting machine operator who works nearest the working face **on the return air side of the continuous mining machine**; the face haulage operators on MMUs using blowing face ventilation: the face haulage operators on MMUs ventilated by split intake air (“fishtail ventilation”) as part of a supersection; and face haulage operators where two continuous mining machines are operated on an MMU.”

At the Castle Valley Mining Complex all of our continuous mining sections are on a split return system, and typically 6 entries utilizing one continuous mining machine. The continuous mining machine sequence is from the intake entries towards the return entries, the roof bolter follows the continuous miner, which always keeps the roof bolting machine on the fresh air side of the miner.

The occupation designation for the ODOs that were assigned to us is 014, which is a roof bolting machine that operates on the return air side of the continuous mining machine. I believe the proper occupation designation for our roof bolters would be 012, which is a roof bolter that operates on the intake side of the continuous miner. I also believe that all roof bolters in the nation were assigned this designation without any consideration of which side of the miner the roof bolter operates on. The reason that the bolter on the return side of the miner was established is also the same reason that the haulage operators on a blowing face were established. These occupations are exposed to a higher level of respirable dust.

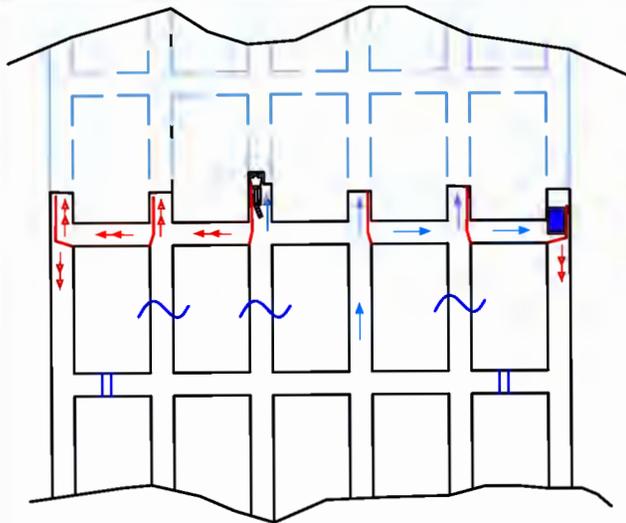
In my opinion our occupation designation is in err. Our roof bolters should be designated as 012 which would not fall under the regulation for establishing ODOs, unless they were to have an over exposure on a quarterly MSHA sample, during an EO1 inspection.

If you have any questions or comments, please give me a call at 435-687-5454 or I may be reached by email at bmcardle@rhinolp.com.

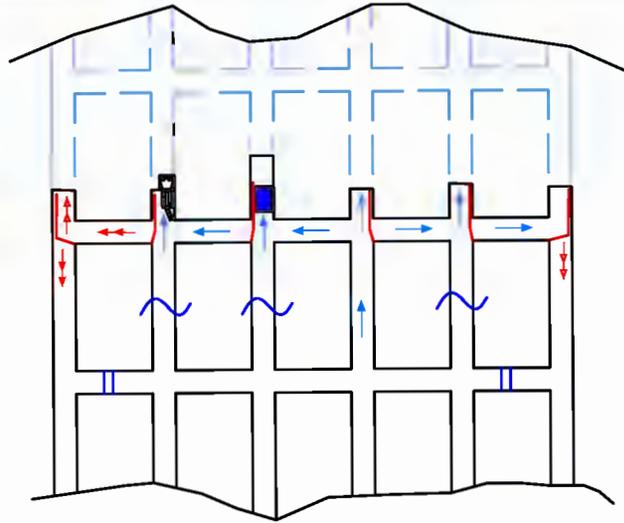
Sincerely,

A handwritten signature in black ink that reads "Brandon McArdle". The signature is written in a cursive style with a large, looping initial "B".

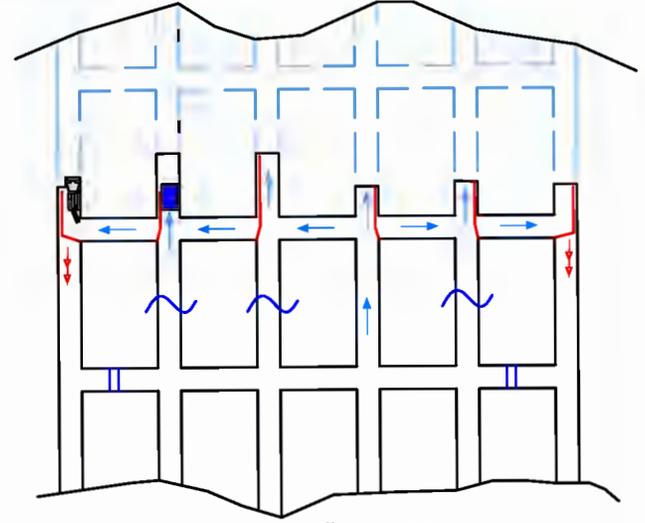
Brandon McArdle
Safety Technician
Castle Valley Mining LLC



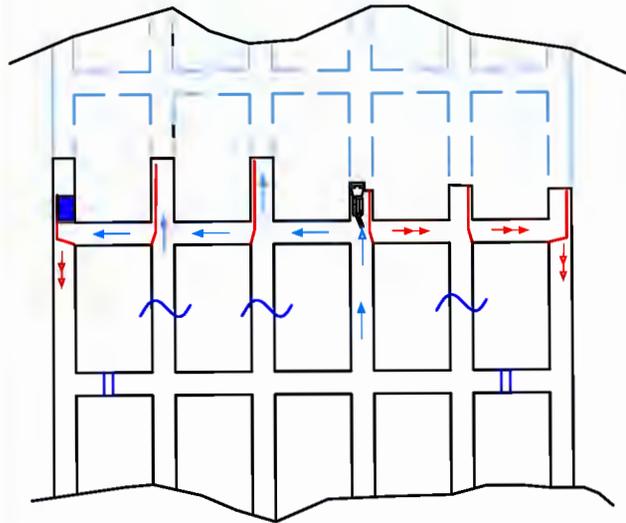
MINER #3 ENTRY
BOLTER #6 ENTRY



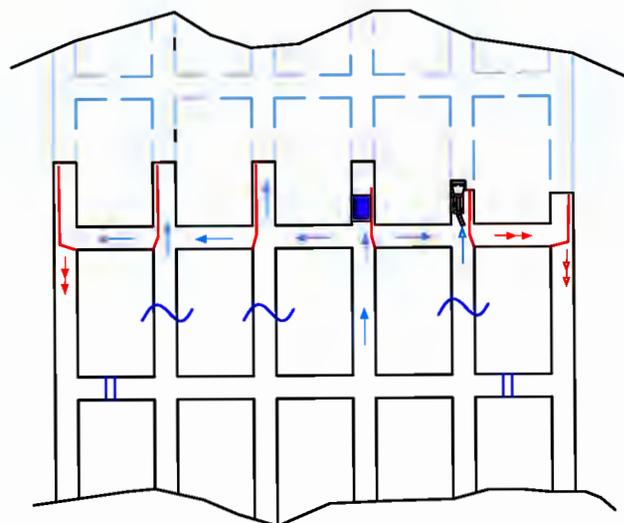
MINER #2 ENTRY
BOLTER #3 ENTRY



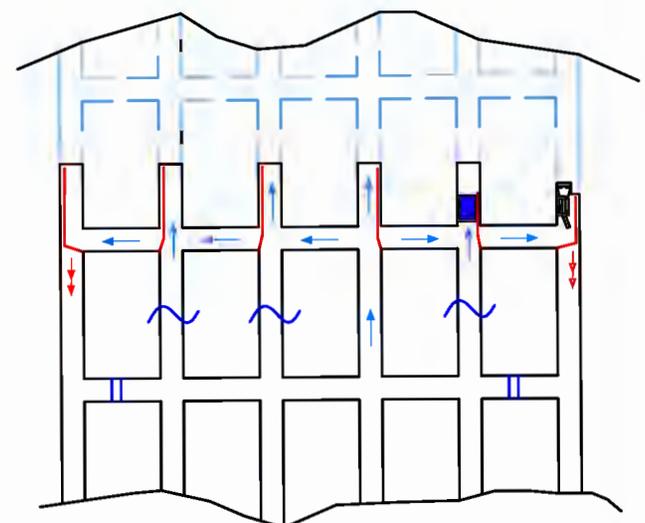
MINER #1 ENTRY
BOLTER #2 ENTRY



MINER #4 ENTRY
BOLTER #1 ENTRY

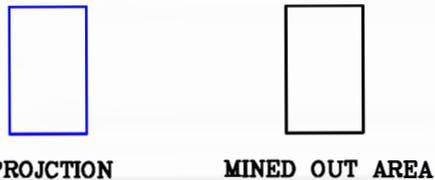


MINER #5 ENTRY
BOLTER #4 ENTRY



MINER #6 ENTRY
BOLTER #5 ENTRY

LEGEND



-  BOLTER
-  MINER
-  CURTIAN

-  CHECK CURTAIN
-  RETURN SIDE OF MINER
-  INTAKE SIDE OF MINER
-  STOPPING



Castle Valley Mining LLC
Castle Valley Mine

TITLE: MINER/BOLTER SEQUENCE	
SCALE: 1-150'	DATE: 12-14--2018
DRAWN BY: JJ ADDRESS: BOX 475 HUNTINGTON UT 84528	