

**From:** [Hank McKay](#)  
**To:** [zzMSHA-Standards - Comments to Fed Reg Group](#)  
**Subject:** Instruction Guides IG7 and IG7A  
**Date:** Saturday, February 23, 2019 12:12:15 AM

---

Comments- IG7: While the guide itself is quite thorough and comprehensive, I have some suggestions that may or may not be of relevance for improvement.

1. CONTROL OF INFORMATION: This may be an issue better suited for Responsible Person training, but it seems that it is rarely a consideration until after the cat is out of the bag. With virtually unlimited access to social media and internet, perhaps it would be prudent to address some best practices for prevention of leaked and mis-information. The matter is just as relevant to rescue teams as it is to miners that were withdrawn from a disaster. Make it known that communications to loved ones, friends, media or anyone not involved with the operation or crisis, may be forbidden and must be authorized through the designated official. Some remote operations have the ability to deactivate the cell towers that serve their locations to aid the control of information getting off site. Personnel may then be allowed to notify relatives and loved ones that they are out and OK in a controlled, monitored environment, VIA land line.
2. Module 4-14, Examples of Equipment: Add durable lifeline for travel through smoke where radios are used for communication. Cyalume sticks or chem lights are also good “bread crumbs” for finding the way back through smoke, marking FPAs etc.
3. Module 4-18, Information Needed: When teams are briefed or rotated from back-up to active, mine orientation and numbering should be consistent for mapping purposes. Teams should inquire how the entries cross-cuts are labeled and numbered to prevent confusion.
4. Module 4-45, Marking the Map: The illustration used, would be more effective and consistent if National Mine Rescue Mapping Symbols were used.
5. Module 5, Means of extinguishing fires remotely: Nitrogen generation has become a normal part of the mining process where bleederless ventilation is used. This is a proven means of taking oxygen out of the fire triangle. And can be done remotely.
6. Module 6-4, Entering Refuge Alternative/Chambers: As all RAs are approved with air-locks already built in, it would not be a good use of time to construct an air-lock to enter a portable or hardened Chamber. Many mines have in their Emergency Response Plans, an extensive inventory of Self-Contained, Self Rescuers (SCSRs). Once the team has established the number of able-bodied survivors inside, breathable air may be provided from nearby SCSR caches to lead them out. Ambulatory survivors may have to be removed one at a time from chambers and may require a Care-Vent apparatus or equivalent.
7. Module 6-8, Procedures for bringing out survivors one at a time: The third procedure reads; The rescue team should then carry the stretcher through the air lock and proceed to the fresh air base by the shortest and quickest route. The word explored should be added between quickest and route.

Hank McKay – Mine Rescue Coordinator/Instructor