

United Mine Workers of America



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REG-21

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MSHA Office of Standards, Regulations, and Variances
201 12th Street South
Suite 4E401
Arlington, VA 22202-5452

Re: Docket Number: MSHA-2025-0086
Regulation Identification Number: 1219-AC20

The United Mine Workers of America has reviewed MSHA's proposed rule that would revise provisions for metal and non-metal (MNM) mines and coal mines regarding the use of trolleys for transportation of mined ore, coal, material, and personnel. The UMWA strongly disagrees with the Agency's belief that the current standard protecting miners from the hazards of trolley systems should be removed from the code.

MSHA states that, "trolleys are an outdated technology that have been replaced by more efficient belt conveyor haulage systems for transporting mined ore and coal. Diesel and battery-operated mobile equipment are now used to transport personnel and equipment. Trolleys are no longer used in MNM or coal mines, and there is no anticipated future use of this legacy equipment in MNM and coal mines."

While trolleys are no longer used in most coal mines, they have not been completely replaced. There are still some coal mines that have trolley systems still in use. For example, the Marshall County coal mine (MSHA Mine ID 46-01437) has trolley equipment still in service at the bottom of its Fish Creek portal.

It is concerning that the Agency was not aware of this before publishing this proposed deregulatory action. The UMWA is not aware of any other mines that we represent that still use trolley equipment in their mine. However, it does raise the question of how many other mines in the United States the Agency has overlooked that still use trolley equipment somewhere in their mine.

The UMWA believes that the current provisions contained within Title 30 of the Code of Federal Regulations (30 CFR) parts 56, 57, 75, and 77 related to trolley systems and equipment should remain because there are obviously still mines using this type of equipment. Also, in the

event a mine would want to put their trolley equipment back into service for any reason, there should still be regulations to protect miners from the appropriate hazards.

Removing all references to trolley systems and equipment from 30 CFR parts 56, 57, 75, and 77 would do nothing to protect miners' health and safety. This would, in fact, do the opposite and put the miners who still work on or around this equipment in more danger. This goes directly against Section 101(a)(9) of the Mine Act. Which states, "no mandatory health or safety standard promulgated under this title shall reduce the protection afforded miners by an existing mandatory health or safety standard."

Thank you for the opportunity to comment on the proposed rule.

Sincerely,



Josh Roberts, Administrator of Occupational Health and Safety

cc: Cecil Roberts, International President
Brian Sanson, International Secretary-Treasurer
Phil Smith, Executive Assistant to the President
Mike Phillippi, Executive Assistant to the Secretary-Treasurer
Kevin Fagan, General Counsel