

United Mine Workers of America



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September 14, 2009

NIOSH Mailstop: C-34
Robert A. Taft Lab.
4676 Columbia Parkway
Cincinnati, OH 45226

To Whom It May Concern:

The UMWA is pleased to offer the attached comments on *The NIOSH Health Hazard Evaluation Program*.

Should you have any questions, please do not hesitate to contact me at (703) 208-7120.

Sincerely,

A handwritten signature in cursive script that reads "Dennis B. O'Dell".

Dennis B. O'Dell, Administrator
UMWA Department of
Occupational Health & Safety

/lw

Attachment

NIOSH Health Hazard Evaluation Program

NIOSH Docket 185

The United Mine Workers of America (UMWA) is pleased to have the opportunity to offer comments on NIOSH's Health and Hazard Evaluation Program and their Plan to Implement the National Academies Program Evaluation Recommendation.

We are pleased to see that strides are being made to improve the HHE process and that NIOSH has responded favorably to the National Academies (NA) recommendations.

We do however feel compelled to point out the important role of Labor, their Representatives, and its Members as a key focus to this entire process. Under **Section 3.4 Vision** of the document, your vision speaks of a way for the future. To successfully and fully attain this vision, it is important that NIOSH engage more with Labor Organizations, their Representatives, and its Members. These are the hands on people that know the workplace better than anyone and who are affected by the workplace hazards. This group is the most valuable resource and stakeholder to the making this process work. We have participated in investigations when the investigator spent time at the workplace and took time to interview as many people as could be expected to be affected by the hazard. These have resulted in the success stories of finding a solution to the problem. On the flip side we have witnessed times where NIOSH has investigated a complaint and not spent enough time with the workforce to get the full picture only to sign off on a report of negative findings leaving the workers still exposed to the hazard. This is why this group has to be a priority in the HHE Program.

Section 4.5.1.1 Establishing partnerships with government programs that can use HHE-generated information recommend a promotion and increase in direct communication, especially with OSHA and state occupational safety and health

agencies. NIOSH responded that the HHE staff participates in ongoing, regularly scheduled NIOSH-OSHA issues exchange meetings. The UMWA would like to see NIOSH take this same approach with all Unions as well as the Department of Labor's Mine Safety and Health Administration that oversees the protection of miners in this country. This could be a way to share information and help identify hazards NIOSH has already addressed with the HHE program, some of which could be jeopardizing our miners' health and well being.

Overall, the UMWA is pleased with NA's recommendations and NIOSH's progress towards answering them. The UMWA looks forward to a continued working relationship with NIOSH. It is our vision that every worker across the Country has full access to NIOSH's HHE Program and uses it in the event the need occurs.

In closing, the UMWA would like to express our appreciation to the National Academies and NIOSH for the work you provide in protecting our Nation's workforce. We hope that by accepting our comments and implementing them into your HHE Program, we can all stride to make it even better.

Our Nations workers ask for one important thing in life and that is to be able to return home safely to their loved ones at the end of their work day. The workers are America's most precious resource. If we all work together, the UMWA feels confident we can make this happen.