



April 10, 1987

TO: Lowell Braxton, Permit Supervisor  
FROM: Lee Spencer, Reclamation Mining Engineer  
RE: Blasting Recertification Training - Utah Fuel Company,  
Skyline Mine, ACT/007/005, Folder No. 2, Carbon County, Utah

Background

In a letter from Mr. Glen Zumwalt of Utah Fuel Company dated January 28, 1987 to Walt Axelgard, Commissioner State Industrial Commission, (UIC), Mr. Zumwalt requests "if appropriate" that the Utah Industrial Commission review and approve a retraining program for personnel who "occasionally perform blasting on the surface.

The training program and request was passed on to DOGM by Mr. Richard G. Robinson, Chairman CEU Mining Department, who is presently providing training for Blaster Certification. Mr. Robinson has discussed the training with Walt Axelgard and states "our concern is who would authorize its use and under what conditions". Their opinion is that the "who" is DOGM, the agency responsible to OSM. Mr. Robinson's letter requests our ruling on this decision. Mr. Robinson states that Mr. Axelgard and he recommend approval of this training plan as presented.

Decision

- As I see it, the decision to approve this plan based on our MOU with the UIC, is involved specifically on the content of the training per enforcement of the current rules SMC/UMC 850.5 et. seq., SMC 816.61 and UMC 817.61. The OSMRE approval of Utah's amendment to the Permanent Regulatory Program states "Industry training courses may be conducted with participation of the Division (DOGM), C.E.U., and U.I.C. for adequacy. Training, examination, and certification requirements are found at SMC and UMC 850.13. The Director finds these provisions include the necessary items to train mine personnel in the areas listed at 30 CFR 850.13.
- Attached please find a listing of the above items under UMC 850.13 and Utah Fuel's plan. After a cursory review, please note that the retraining plan by Utah Fuel does not address these items as applied to surface blasting:

- Utah Fuel could argue that what surface blasting contained in their blasting operations does not require an in depth knowledge of surface blasting. However, certification allows a blaster to conduct major surface blasts and I am not sure that any conditional certification is allowed. Generally all that the Utah Fuel Plan addresses is underground blasting. I personally don't feel the surface effects of blasting extend underground which is reflected in our amendment and approval. Utah Fuel should be able to continue using personnel certified by UIC- shotfirers, firebosses, and mine foreman to shoot underground without certification. However, if Utah Fuel wishes to shoot on the surface a certified blaster per the training in SMC/UMC 850.13 is required. The intent of these regulations- airblast, vibration, etc. are aimed to control of surface blasting and the approved amendment reflects this intent.
- Another concern is that personnel certified as shotfirers are allowed to become certified as blasters by simply taking the retraining course. These personnel may not have met the minimum requirements per SMC/UMC 850.14 including the passage of a written and oral examination. Many personnel who hold these coal mining certificates have never actually drilled, loaded, wired, or initiated a blast even though UIC has provided questions concerning underground blasting on their examinations for the certificates they hold.

### Recommendations

Before any approvals or disapprovals are concluded for Utah Fuel's retraining, these issues and recommendations should be discussed internally with Ron Parkin, State Mine Inspector and Richard Robinson, CEU.

- Recommend to UIC approval of Utah Fuel's blaster retraining program with additions to the plan which cover procedures and site-specific performance standards of surface blasting per SMC/UMC 850.14 and their blasting plans.
- Recommend to the UIC that all those certified as a shotfirer who are now initially deemed certified as a blaster per SMC/UMC 850.5 be required to pass (80%) the written and oral examination on their initial recertification. This would verify that the retraining program and knowledge of the shotfirer is initially adequate.

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- Additionally, I feel it is only fair that if UIC agrees with Utah Fuel Company that those certified as Firebosses and Mine Foreman meet the requirements of Shotfirer's, UIC should then certify these personnel as shotfirers so that these people are deemed blasters per SMC/UMC 850.5 and will be able to recertify as blasters with retraining and examination.

Feel free to forward use memorandum with a cover letter to the Utah Industrial Commission, CEU, and for information to Utah Fuel Company. Should you wish that I take the time to write suggested additions to the Utah Fuel Company's retraining plans, I would be glad to assist them. These additions would then need Richard Robinson's and UIC's concurrence.

jvb  
Enclosure  
cc: Dianne Nielson  
Ron Daniels  
Ken May  
Sue Linner  
0969X-58