

January 18, 2015

Occupational Safety and Health Standards Board  
2520 Venture Oaks Way, Suite 350  
Sacramento, California 95833

RE: Update to the CAL-OSHA Tunnel Safety Orders

Gentlemen:

I am writing to you to correct a section from the Tunnel Safety Orders which you are currently reviewing. I was on the original committee which was chaired by Mr. Steve Hart, Principal Engineer, of CAL-OSHA Mining and Tunneling. In particular I would like to add a paragraph under *Section 8407 Safety Training and Instruction* as follows:

*8407(c) Each employee shall receive refresher training every 5 years including, but not limited to, the following subjects.*

*(1) Ventilation*

*(2) Recognition of Hazardous Atmospheres*

*(3) Illumination*

*(4) Communications*

*(5) Mechanical Equipment*

*(6) Personal Protective Equipment*

*(7) Explosives (if applicable)*

*(8) Fire Prevention and Protection*

*(9) Emergency Procedures, including evacuation plans and a check-in/check-out system*

As in the underground mining industry, refresher training is required for miners under the Mine Safety and Health Administration. Likewise, "miners" tunneling underground should have refresher training especially since many employees are not miners by trade. They are mechanics, electricians, carpenters etc. from the construction industry. During the construction of the Los Angeles Metro Rail Redline tunnel, I was given a tour of the tunnel. I was asked by a worker underground if I was there to provide training for the workers. I said "No." He was visibly frightened. He had never worked underground before. That short conversation has stayed with me all these years. The culture back then and even now is underground construction is surface construction taken underground. This is wrong thinking.

One of the largest wholesalers of water is the Metropolitan Water District of Southern California where I use to work. The safety management there decided if there was no requirement for training beyond the initial training, then it falls under "once in a career training." Some employees as you might be aware work many years for one employer. Once in a career is not enough.

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**OCCUPATIONAL SAFETY AND HEALTH  
STANDARDS BOARD**

Though many feel tunnel disasters are a once in a lifetime event, consider these in Los Angeles alone; all happened during the construction of each tunnel during my lifetime...

Sylmar Tunnel Disaster.....1971

Metro Rail Tunnel Fire in Downtown LA.....1990

Metro Rail Redline Sinkhole.....1995

???.....2015?

Thank you for reviewing my proposal. Tunnel safety refresher training every 5 years will improve the safety of everyone when they go underground to work.

Regards,

A handwritten signature in black ink, appearing to read "Steeve Inagaki". The signature is fluid and cursive, with a large initial "S" and "I".

Steeve Inagaki, PE