

Industry Perspective on Seals and Sealed Areas

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Sealing and Sealed Area

- Current Seal Standards
 - Mitchell Barrett Seal – 30CFR75.335(a)(1)
 - Alternative Seals – 20 psi requirement
30CFR75.335(a)(2)
 - P.I.B. Seals – 50 psi recommend and
evaluated through Technical Support, but
approved through MSHA Districts
 - Seal Standards Required by MINER Act

Mitchell Barrett Seal – 30CFR75.335(a)(1)

- Only approved seal design by regulations
- Only industry wide approved seal since the release of the P.I.B. of July 19, 2006.
- These seals are labor intensive construction requiring material handling and hitching
- Seal does not perform well in areas of higher convergence – Higher leakage possible, potential for spontaneous combustion

Alternative Seals – 20 psi requirement 30CFR75.335(a)(2)

- Most seals currently in-place in U.S. Coal Mines are designed to this performance standard.

P.I.B. Seals – 50 psi approved through Technical Support

- Engineering designed approved through Technical Support as compared to in mine testing of the 20 psi seals.
- Site / Mine specific approvals, resulting in an extended time process for approval and construction
- PE Certification

Seal Standards Required by MINER Act

The following items that may impact the future design requirements:

- Testing of Seals from Sago - ??? Results
- Mining Standards from other countries - ???
- Report from NIOSH - ??? Results

New seal Regulations required by Dec. 15th , 2007

Industry Dilemma

- Unknown standards for alternative seals
- Regulatory Stability for Mine Planning / Sealing is Needed
- Risk analysis of sealing verses ventilating inactive areas
- Determine the effectiveness of existing seals

Unknown standards for alternative seals

- Construction
 - Will current alternative seals built today per the current P.I.B., be adequate for future requirements?
 - Will construction standard be based on a performance model?
 - No explosive atmosphere mixture
 - Explosive atmosphere mixture potential
 - Monitoring and Inerting Program for Sealed Areas
 - Explosive Atmosphere Potential for Sealed Areas, no monitoring or inerting plan
 - Will construction be based on a prescriptive model?
 - Will standard allow for practical construction?

Unknown standards for alternative seals

- Monitoring
 - Location of Monitoring Points
 - Distance from Seals into the Gob
 - Acceptable Monitoring Device (s)
 - Acceptable Monitoring Frequency and Subsequent Actions
 - When sampling should occur (out gassing?)
 - Trending

Unknown standards for alternative seals

- Artificial Inerting
 - Infrastructure issues
 - Borehole (Access to surface, increase number of holes?)
 - Piping Network
 - Availability of Inert Gases
 - Inherent problems produced by inertization devices such as a Tomlinson Boiler or Jet Engine
 - CO in Gob, Nitrogen in Gob may mask or create concerns
 - Surface Noise
 - Deterioration of mine roof and floor around Seals (leakage)
 - Ability to accomplish in a large gob on a long-term basis
 - Active area air quality issues

Regulatory Stability for Mine Planning / Sealing is Needed

- Definitive Seal Design that allows for no additional actions once installed
- Seal Standard with:
 - Clear Approval System
 - Performance Criteria
 - Cost Effective Construction Design to allow sealing in lieu of ventilating old works
 - Design Considerations – Initial panel starts, etc.
 - Timeliness / Ease of construction
 - Definition between Gob Isolation Seals and District Seals
 - Allow for Convergence (strength of material)
 - Short-term use of seals

The End