
From: Dunn, Catherine [mailto:cadunn@state.pa.us]
Sent: Monday, September 08, 2008 2:37 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Cc: Scaffoni, Joseph (PDMM); Walker, Dennis; Martin, Alan; Bookshar, William
Subject: ROM 1210-AB60 Conveyor Belt Toxicity and Smoke Density

Cathy Dunn
Clerical Supervisor I
Bureau of Mine Safety
724-430-4475
cadunn@state.pa.us

AB60-COMM-6

Utilization of Belt Air and Fire Retardant Properties of Belt Materials - Comments on Proposed Rules

1. Pennsylvania is the 4th largest coal producing state yet there were no public meetings held in Pennsylvania. There should be public meetings held in Pennsylvania for all rule making issues.
2. The 1992 study recognized the need for upgrading the standards and over 15 years later, no improvements have been made. The flame resistant standards for conveyor belting should include a requirement to address technology improvements that are revisited on a periodic basis. This will ensure that the mine belting flame resistance requirements stays current with current technology.
3. Drive belt pulley lagging should also be included to ensure it meets the same fire resistance / retardant standards required under this proposal for conveyor belting.
4. The proposed regulations in section 14.4 b2 describe a “similar” belting but do not include what variance in compounds are acceptable for belting to be similar. This should be included in the proposed rule.