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Sent: Monday, September 10, 2007 6:17 PM

To: zzMSHA-Standards - Comments to Fed Reg Group

Cc: Kenneth McGlothlin/YM/RWDOE

Subject: RIN 1219-AB56

Sirs,

Under IV. Section-by-Section Analysis number 5. Section 49.6(a)(6) it states that MSHA is proposing to amend existing 49.6(a)(6) to require mine rescue stations serving underground M/NM mines to have four gas detectors appropriate for each gas which may be encountered at the mines served. For methane, carbon monoxide, and oxygen deficiency, the proposal would require that the gas detectors must be able to measure methane concentrations from 0 percent to 100 percent of volume, oxygen from 0 percent to 20 percent, and carbon monoxide from 0 ppm to at least 10,000 ppm.

The issue here is the requirement that methane must be measured up to 100%. This should only apply to gassy mines not non-gassy mines. In non-gassy mines your combustible gas sensor must be calibrated in the LEL mode and not in the methane mode which is required by most gas detection manufactures. Any new MSHA requirement for gas detection should state that all gassy mines shall have a measuring range for methane from 0 to 100% by volume. In addition MSHA should state if the mine is classed as a non-gassy mine then combustible gas measuring can be determined by the proper mine authorities or qualified person. In a non-gassy mine it is of utmost importance to trend the LEL combustible gas measuring mode to determine if the atmosphere is going to cause a potential back draft or over flash in an oxygen deficient atmosphere. This trending cannot be done properly with a 0 to 100% infrared gas tester because the combustible gases created by the fire cannot be detected by this infrared sensor. This type of infrared sensor is the only type that can measure 0 to 100% volume of methane.

Also this same section states that the carbon monoxide measuring range must be able to measure up to 10,000 ppm which is 1%. This can be achieved quite easily with a high range gas tube and belows pump to extend the range of the electronic gas tester which has been standard practice for the last 20 years and is quite accurate.

In many metal mines other gases such as nitrogen dioxide, sulfur dioxide, and hydrogen sulfide must also be measured. So to trend the LEL properly, measure up to 100% methane, and test for all other gases each working team will need to have at a minimum 4 gas testers each not 2 gas testers each. Why must we measure for high concentrations of methane if we have never and will never have any methane at our facility?

Regards,

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