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P.O. Box 1900 • Morgantown, WV 26507-1900 • (304) 296-1751 • FAX (304) 594-3467
The Greer Mansion • 598 Canyon Road
www.greerindustries.com



October 23, 2007

Mine Safety and Health Administration
Office of Standards, Regulations and Variances
1100 Wilson Boulevard
Room 2350
Arlington, VA 22209-3939

Re: Proposed Rule Mine Rescue Team Equipment Underground Mines

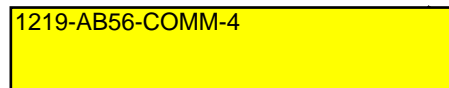
RIN: 1219-AB56

Dear MSHA:

This letter is the commentary of Mark A. Wilson, Vice President of Safety and Human Resources, Greer Industries, Inc. to the above-mentioned Proposed Rule. It is my fervent hope that MSHA will give serious consideration to these comments in the spirit that they are intended. My #1 priority has always been a strong commitment to miner safety and health, however I see little if any increases in safety to underground (non-gassy) metal and non-metal mines. Especially in the category of underground limestone mines! In fact, this proposed rule would only increase costs to underground limestone mines with no increases in safety to the miners. The mine operators will be the ones responsible for purchasing these detectors for the rescue teams should the proposed rule become law. Allow me to explain.

MSHA believes that the key to increased safety and health to our nations miners is through reactive increases in enforcement, and in this case increases of required emergency equipment that in reality would not increase safety to mines classified as non-gassy, metal and nonmetal underground limestone mines. Requiring mine rescue stations serving non-gassy underground M/NM mines to have four gas detectors appropriate to measure gases that may be encountered during an emergency, which I presume is an explosion is totally unnecessary. The issue here is the requirement that methane must be measured up to certain levels. This should only apply to gassy, metal and nonmetal mines with methane. Any new requirement for additional equipment should state that methane detection equipment is only required at gassy mines, and that if a mine is classified as non gassy then combustible gas detection can be determined on a case by case basis at each particular mine by proper mine authorities, or qualified persons.

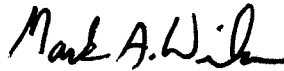
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To more fully understand my position one must know, and therefore understand the mine atmosphere in underground, non-gassy limestone mines. There is nothing to cause an explosion in a non-gassy mine. We have no methane, no combustible dust, no coal, and therefore no combustible ribs, roof, or other potential inherent combustibles. We do have equipment, which can cause a fire, and therefore the requirement for escape and emergency evacuation and fire protection is already in the regulations. There is no need for more regulation in the area of Mine Rescue Equipment for underground M/NM non-gassy underground limestone mines.

Carbon Monoxide detection and O₂ deficiencies are necessary if an underground equipment fire should occur in a non-gassy underground mine. However, the standard practice of using the electronic O₂ and gas testers in conjunction with a bellows pump gas tube tester is quite appropriate, necessary, practical, and quite frankly been the standard of practice during my past 27 years as a safety professional. There is no need to reinvent the wheel here. What we are already doing in these non-gassy M/NM mines works. There is no need for more regulation, which does nothing to increase safety. It does, however increase an operator's cost to no avail! Why does MSHA always implement new regulation on a reactive basis? I submit that there is absolutely no reason to react to political pressure due to the recent mining disasters that have occurred over the past year, or so. Underground M/NM non-gassy mines had nothing to do with these underground coal mine disasters. We should not be lumped into that category now! After all, there is no reason to have costly equipment on hand to measure methane, if we have never, and will never have any methane at our facility!

Sincerely,



Mark A. Wilson
Vice President
Greer industries, Inc.