

Received November 8, 2007

1219-AB56-COMM-7

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Sent: Thursday, November 08, 2007 1:58 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: [Docket No: 1219-AB56];[FR Doc: 07-04318];[Page 51338-51347]; Coal mine safety and health: Underground mines – Rescue teams; revision of existing standards for training, certification, etc.

With regards to proposed 49.16(a)(6) Four gas detectors appropriate for each type of gas that may be encountered at the mines served.

This is a rather broad and vague regulation. Samples of our mine atmosphere, when analyzed on a gas chromatograph, show that hydrogen, carbon dioxide, nitrogen, and ethane are commonly encountered. There are probably other gases present that we don't look for intentionally. There are probably NOx and SOx gases from diesel equipment that we also don't routinely analyze. Should we have a detector available because the regulation says "each type of gas that may be encountered"?

This wording should be changed if this was not the intent. Commenters and transcripts of hearings have only been concerned with the increased range of detection required in the new proposal. The proposed regulations even single out the detection levels for methane, oxygen, and carbon monoxide. Some commenters have stated that they have specific detectors for H2S. I understand the mine specific need if certain gases are present in large concentrations, but over zealous inspectors could issue a citation for not complying with the letter of the law, which says to have a detector for each type of gas that may be encountered. This seems to be over-reaching and should be re-worded.

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