



COMMENTS
Proposed Regulations
Belt Entry as an Intake Air Course

Jim Walter Resources, Inc. would like to thank MSHA for the opportunity to comment on the Proposed Belt Air Regulation. We would again like to restate part of what we testified to in Birmingham, Al. and that is that we would like to see MSHA Grandfather the parts of the mine that is under older petitions with sensors on 2000 foot spacing. We have operated with sensors on 2000 foot spacing for approximately 25 years and with a good proven track record. Our mines were visited by the Belt Air Advisory Panel and many of our operation practices were considered in this regulation. We understand that most of the new petitions are on 1000 foot spacing and we understand the rationale for this but with our record of belt air use and the burden to the operator to go back and add all these sensors we believe that to Grandfather the older part of the mine is a reasonable request. This is not a precedent, there are other regulations where older parts of the mine are Grandfathered and the new regulation takes effect for all new drivage. We would also like to see MSHA state that this regulation replaces the need for point type heat sensors.

We would also like to comment on some testimony that was given in Birmingham. One suggestion was to sound alerts at the section in addition to alarms. We are opposed to this because it will mean more instances of the section alarm sounding and would propagate indifference to its sounding. We feel that our system will pick up many problems at much lower levels than the alarm level, but we need to give the operator time to ascertain the severity of the problem. We also question the moving of the section alarm as was testified to. We believe it should be visible, but if it is moved into the airstream that passes the ramcars it will have many nuisance alarms. One testified that all calibration should be done only on idle shifts. This may not be possible with the number of sensors that need to be calibrated. Also, we believe that a certain part of the calibration process should be verification that the alarm did in fact sound on the section as the calibration was done. Comments were made that the section alarm could not be heard above the noise of the ramcar and that the alarm should be louder. This would put us out of compliance with current noise regulations, but we feel that careful consideration should be given to where the visual alarm is placed.

We at Jim Walter currently monitor the slip switches of all underground belts. It is the same switch that is responsible for stopping the belt in case of slippage. We do not set off the section alarm when this switch operates, but it could be done. The control room operator knows that the switch has tripped and can notify responsible people but there is question as to whether the section alarm should be set off. Some thought should be given to the necessity of this and other safeguards that may or may not be needed before regulating this process.

Please consider these comments for the proposed regulation to utilize the belt entry as an intake aircourse.