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MSHA/OSRV

August 23, 2004

Marvin W. Nichols, Jr.
Director
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, Virginia 22209-3939

RE: Written Comments on Proposed Rule and Information Collection Requirements for
30 CFR Part 75 Low-and Medium-Voltage Diesel-Powered Electrical Generators
Deer Creek Mine 42-00121

Dear Mr. Nichols:

We have reviewed the proposed rule for Low- and Medium-Voltage Diesel-Powered Electrical Generators and provide the following written comments:

1. Proposed Regulation (b)(2):

“A grounding resistor rated for the phase-to-phase voltage of the system must be provided to limit the ground-fault current to not more than 0.5 amperes. The grounding resistor(s) must be located:”

Comment:

Part 75.801 Grounding Resistors

The grounding resistor, where required, shall be of the proper ohmic value to limit the voltage drop in the grounding circuit external to the resistor to not more than 100 volts under fault conditions. The grounding resistor shall be rated for maximum fault current continuously and insulated from ground for a voltage equal to the phase-to-phase voltage of the system.

Part 77.901 Protection of low-and medium-voltage three phase circuits.

- (b) Grounding resistors, where required, shall be of an ohmic value which limits the ground fault current of no more than 25 amperes, such grounding resistors shall be rated for maximum fault current continuously and provide insulation from ground

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for a voltage equal to the phase-to-phase voltage of the system.

Typically grounding resistors on underground power centers are rated for 15 amps, 277 volts for 480 volt applications and 15 amps, 600 volts for 950 volt applications. We feel limiting the ground fault current .5 ampere on a diesel powered generator, which is typically a low or medium voltage application, is too restrictive and will cause confusion. We feel that the requirements for diesel operation should be the same as for other electrical installations of low and medium voltage equipment.

2. Proposed Regulation (b)(3):

“Each three-phase output circuit of the generator must be equipped with a sensitive ground fault relay. The protective relay must be set to cause the circuit interrupting device that supplies power to the primary windings of each transformer to trip and shut down the diesel engine when a phase-to-frame fault of not more than 90 milliamperes occurs.”

Comment:

We feel 90 milliamperes fault current is too restrictive for circuit interrupting devices for ground fault relays. As we understand MSHA policy, a typical electrical installation underground requires the ground fault relay setting to be no more than one half the value of the grounding resistor. We feel the requirements for diesel operation should be the same as those for other electrical installations especially those of low voltage applications.

3 Proposed Regulation (b)(12):

“Prior to moving each piece of equipment or performing work, a functional test of each ground fault and ground wire monitor system must be performed by a qualified electrician who meets the requirements of 75.153. The ground-fault circuit must be tested without subjecting the circuit to an actual grounded phase condition. A record of each test must be maintained and made available to authorized representatives of the Secretary and to the miners in such mine.”

Comment:

We feel a functional test would only be necessary at the start of each project. You may start in the mine on one shift then skip a shift or multiple shifts and start moving again. What would have changed in this period of time that would be any different than momentary stoppages. The preamble addresses momentary stopping of the equipment but if the equipment has been examined prior to the start of the project we feel it should continue to be safe to move until the project has been completed. In addition the equipment would be checked on a weekly basis and is required to be maintained in a safe operating condition. We would suggest changing the wording to a functional test at the start of each project.

We appreciate the ability to comment on these proposed rules. Should you have any questions regarding our comments please feel free to contact me at (435) 687-6642.

Sincerely,

Kevin Tuttle

Kevin Tuttle
Manager of Safety

Cc: Randy Tatton, Frank Zmerzlikar, Lee Israel, **Gary** Christensen

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