Jim Walter resources, inc.
BLUE CREEK COAL - BROOKWOOD, ALABAMA

MINE #7

December 9, 2004

Mr. Marvin W. Nichols Jr.
Director, Office of Standards,
Regulations, and Variances
Mine Safety and Health Administration
1100 Wilson Boulevard, Room 2350
Arlington, VA 222209-3939

RE: RIN 1219-AB34 (High-Voltage Continuous Mining Machines)

Dear Mr. Nichols:

Jim Walter Resources, Inc. is submitting for the record comments on the High-Voltage Continuous Mining Machine Proposed Regulations. The attachment contains the items of concern and the changes that should be incorporated into the final regulations.

Rob Dzurino
Manager Continuous Miners
No. 7 Mine

JIM WALTER RESOURCES INC.
HIGH-VOLTAGE CONTINUOUS MINER- PROPOSED REGULATIONS

PROPOSED RULE NO.	PROPOSED RULE	ISSUE	JWR POSITION
75.828	Trailing cable handling and pulling	[b]Cable must be de-energized prior to being pulled by any other equipment other than the continuous mining machine.	The regulation should read: [b] Pulling. Cable manufacturers recommended pulling procedures must be followed when pulling the trailing cable. There is no gain of safety by de-energizing the trailing cable while pulling with another of equipment. The high-voltage trailing cable is significantly safer than other cables
75.830	Splicing and repair of trailing cables	No definition of splice or repair in proposed regulations.	Add definition of splice and repair (major or minor) to the regulations to read Each splice and major repair shall be made so that all cable components are replaced with similar components Repairs are considered major if there is any damage to the metallic shielding, semi-conductor tape, inner conductor insulation, and conductors. Minor repairs to the outer cable jacket may be made by using tape accepted by MSHA as flame-resistant
75.382 [a], [b], [c]	Frequency of examinations: [a] Ground fault test every 7 days [b] Ground fault test every 7 days [c] Ground wire monitor test every 7 days	This regulation requires a test of the circuits every 7 days.	The testing should be weekly as approved in current petitions and be consistent with other electrical regulations.
75.832 [d] [1] & [2]	Frequency of examinations: [d] Trailing cable inspection	This item should read the same as granted petitions. The requirement in the proposed regulations to de-energize the cable during these inspections should be removed. During these inspections, if handling of the cable is needed, high-voltage gloves must be used.	75.382 [d] should read: Once each day a qualified person shall inspect the entire length of the high-voltage trailing cable from the section power center to the continuous miner. The inspection shall include inspecting the integrity of the outer jacket of the high-voltage trailing cable, all permanent splices, and those areas where additional protective guarding is required. Any defects detected during such inspection shall be immediately corrected. Once each production shift a person designated by the operator shall visually inspect the high-voltage trailing cable from the last open crosscut to the miner to check the outer jacket for damage.
75.833	High voltage insulating gloves used for handling high-voltage trailing cables	Requires using a class 1 or greater rated glove with leather protectors. Testing of gloves every 30 days.	The new regulations should have a provision for using a higher rated glove (class II or greater) to be used as per the manufacturers recommendations which allows a higher class of gloves to be used without the leather protectors. The 30 day testing is too stringent because of the quantity of gloves used (1 pair of gloves for each individual because of health issues) and the turnaround time for testing (1-2 weeks) will require purchasing of many additional pairs of gloves. The gloves should electrically be tested and stored as recommended in ASTM 496-97 and the schedule of testing should follow 30 CFR 75.818, which is every 6 months.