

Agency : MINE SAFETY AND HEALTH ADMINISTRATION  
Title : High-Voltage Continuous Mining Machines  
Subject Category : Coal mine safety and health: Underground mines-- High-voltage continuous mining machines; electrical safety standards  
Docket ID : 1219-AB34  
CFR Citation : 30 CFR 18, 75  
Published : July 16, 2004  
Comments Due : September 14, 2004  
Phase : PROPOSED RULES

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Regulations.gov #: EREG - 1 Submitted Sep 10, 2004

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Comment : There are several changes to Part 18 in the proposed rules. The changes appear to be retro-active. This means that there would have to be changes made to all of the high voltage miners now in use in the country. None of the existing miners were approved with the proposed rules in mind. These changes would require field changes or SNAPS to bring existing machines into compliance. The requirements for barriers inside permissible enclosures may not affect approvals but would require retro-fitting enclosures which will be time consuming and expensive if not impossible in some enclosures. The changes to Part 18 should be for machines built after the effective date. All of the proposed regulations are properly designed to protect persons who must handle the high voltage trailing cable from electrical shock hazards. With the built-in protections against cable damage and the lower tolerances for electrical potential between the person and the high voltage energy it is unnecessary to have 75.833 in the final regulations. This section should require the use of dry leather work gloves to handle high voltage trailing cables. 75.825(h) requires a grounding stick at the power center regardless of the grounding method used. Power centers that use a visual disconnect to de-energize and ground the trailing cable should not be required to maintain a grounding stick at the power center. 75.831(1) (a) (ii) requires that the high voltage trailing cable be locked and tagged to the power receptacle when the visual disconnect is locked out. A provision should be made in this regulation to allow other means of preventing the trailing cable from being

disconnected from the receptacle and connected to another receptacle, such as requiring all spare circuit visual disconnects to be locked and tagged out.

The requirement under 75.381(c) that a high voltage trailing cable be grounded at all times, other than for troubleshooting and testing is unnecessary. A high voltage trailing cable is not subject to accumulation of static charges as is a surface high voltage line that may be subject to wind and other sources of charge buildup and does not require the same type of constant grounding.