

Received 3/15/06 MSHA/OSRV
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**From:** Zickefoose Larry C [Larry.C.Zickefoose@irs.gov]  
**Sent:** Wednesday, March 15, 2006 9:22 AM  
**To:** zzMSHA-Standards - Comments to Fed Reg Group  
**Subject:** RIN 1219-AB44

To: Mine Safety and Health Administration

As a former West Virginia miner, forman-fireboss, and rescue team member, I would like to make the following comments.

Please don't let decisions be made by those with no mining experience, no matter how well intended their actions are. Safe areas in a mine with additional equipment and self rescuers sounds like a good idea, but will this deter the miner's from escaping via their fresh air escape way as a first action? Will some mine operators insist that escape be a 'last' option thus further endangering miners lives. Unless such areas are moved forward as the sections advance they will not be useful, thus the cost of maintaining them must be considered. This will further impair smaller operators from being able to operate, the cost would be too excessive.

The men at Sago should have been able to escape with the self rescuers they had. Their problem appears to have been 'visibility obstructions', thus, this should be the first problem to address.

If these men would have had some kind of a steel rope or line running in the escape way to a given point (maybe to the last permanent stopping), miners would be able to access the escape way even if part of it was engulfed in smoke. They would be able to follow the rope until they hit fresh air. Maybe some sort of emergency lights would penetrate the smoke. Next to be addressed would be response time by rescue teams.

I can not understand how lightning could cause an ignition underground, especially behind seals. There should not have been sufficient oxygen behind a seal to support combustion. There should be no ignition source behind a seal to cause an ignition. Basically, the fire triangle should not exist in a sealed area. Reports stated that the seals were 'blown out'. Those of you who have done accident investigation know that a primary ignitions in FRONT of the seals could possibility create enough vacuum to 'suck' the seals out, thus giving the same appearance.

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The seals are required to be on a separate split of air from the working section (ie. escape ways). Construction of ventilation controls should be reviewed. Reviewing the citations issued at Sago, it appears that proper fire bossing was not the normal practice. If there was a gas accumulation the fire boss should have detected it. That is why he is there. Considering how far he had to walk, the fact that there were two sections, the fact that he would be require to walk the beltway and check the seals, it appears (to me) that he could not have possibly accomplished his requirements in the time frame recorded. Sago had been cited before for improper preshift examinations.

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