

From: Bart Gullong [bgullong@onsitegas.com]
Sent: Monday, March 27, 2006 4:58 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: RIN1219-AB44

To Whom It May Concern:

As to Letter B/C.:

OnSite Gas Systems is developing on a portable breathing unit for mine escape that will enable miners to survive independent of support in an atmosphere consisting of as low as 4% O2, and as high as 1,000 PPM CO and 4% methane. The unit will require no stored compressed cylinder gases, no chemical reaction, no heat generation and will consume only 24-volt XP battery power. Each 4-pound battery will provide life support at up to 10 LPM of breathable air for a period of approximately 2 hours. Additional XP batteries can be carried or stored along routes of escape. Stored batteries' charge level can be maintained by standard mine power (just as emergency lights are maintained in public places) until overhead mine power is lost in an emergency. Operating prototype should be ready in 90 days. For details, contact is below.

As to letter D:

OnSite is also collaborating with a company to develop a fully independent self-contained, crush-proof life support POD that can support 16 men with XP power, XP lighting, ground-penetrating communications, food, water, waste disposal, first aid and sufficient breathing air in a low oxygen (4%), high methane (4%), high CO (1,000 PPM or higher), for a minimum of four days. If 24-volt power can be provided through down-hole or designed crush-proof flexible XP power cord independent of mine electrical supply, survival is limited only by food and water. System will also contain aforementioned portable breathing units for escape or backup. System will be portable enough to stay within close rang of working miners being moved with standard existing mine equipment.

We ask that rescue PODS not be sold short. Miners have consistently cried for self-rescuers and decried safe-harbor chambers because there has never been truly reliable rescue chamber until now. A fully independent self-contained system that is 100% dependable and backed up by multiple failsafe levels that has the full confidence of the miner but still incorporates the option of escape could alter the prevailing attitude.

Regardless of the equipment, a fully systematic approach to mine safety, fire suppression, personnel rescue and mine recovery must be taken. No single piece of equipment or process will ever take all contingencies into account. We will be proposing a full prevention, control, suppression and rescue system that incorporates certain equipment in the mine at all times, other equipment deployed to the mine as needed, standard training for miners and emergency teams deployed as needed.

Please call or email for details.

Respectfully Submitted,

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