From: Casper, Joseph S. [mailto:jcasper@nssga.org]
Sent: Friday, April 02, 2010 3:57 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Cc: Davis, Leah - MSHA
Subject: proximity detection systems

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April 2, 2010

Ms. Patricia Silvey
U.S. Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd
Arlington, VA 22209-3939

Dear Ms. Silvey,

The National Stone, Sand and Gravel Association (NSSGA) submits the following comments on MSHA's February 1 request for information on the use of proximity detection systems for underground mines (Fed Reg. Vol 75, no. 20, February 1, 2010).

NSSGA is the world's largest mining association by product volume. Its member companies represent more than 90 percent of the crushed stone and 70 percent of the sand and gravel produced annually in the United States. There are close to 11,000 surface aggregate operations in the U.S. and about 80 underground aggregate mines.

NSSGA has no objections on the use of "Proximity Detection Systems for Underground Mines" that is limited to "Remote Controlled Continuous Miners (RCCM)." RCCM are not used in underground stone mines. The hazard that exists with RCCM in underground mines is the limited space around the miner and a miner being track mounted, resulting in a piece of equipment that can have abrupt, quick swings in the whole machine that can injure someone in close proximity. This is limited to RCCM. Therefore, the proposed "Proximity Detection Systems for Underground Mines" is best designed to this limited application.

It is worth noting that the application of proximity detection technology to mobile equipment in underground mines is new and un-tested. NSSGA opposes the mandatory use of these detection systems in all underground mines.

Our understanding is that there have been no pinning, crushing or striking accidents in underground stone mines that would have been prevented with the proposed proximity detections systems. The accidents in which 31 miners were killed where a RCCM has pinned, crushed or struck the RCCM operator, or another miner working near a RCCM, have all occurred in coal or in narrow vein metal mines. Approximately ninety-five percent of the continuous mining machines used in underground coal and metal mines are

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remote-controlled, and most RCCMs do not have an operator's compartment. Alternatively, NSSGA is not aware of remote-controlled mining equipment being used in any underground stone mines. Truck drivers, loader operators, and even scalers working in underground stone mines, do so in enclosed cabs.

We would encourage MSHA to strongly consider the nature of the machines and the different working environment in underground coal, metal and industrial mineral mines versus those of stone mines, in regard to this new technology.

With regard to application of this technology to other mining equipment or environments, NSSGA echoes the comments of the Illinois Association of Aggregate Producers, who point out the inherent danger of unnecessarily introducing a significant hazard into the mine environment. An electromagnetic field from a proximity detection system could set off an electric detonator. While most mines use non-electric detonators in wiring up the faces, almost all of them that fire remotely via a trunk line use a single electric detonator to set off the det cord.

Please contact me if you have any questions. I can re reached at (703) 526-1074 / jcasper@nssga.org.

Sincerely,

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