

From: Trent Hahn
To: [zzMSHA-OSRVRRegulatoryReform](#)
Subject: modified regulation
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I would like to add a standard that should be repealed or modified. That standard would be 57.11052(d) (Refuge Areas)

The standard states that refuge areas should be: **Provided with compressed air lines, waterlines, suitable handtools, and stopping materials.**

This standard should be replaced that if air bottles and bottled water is provided for within the refuge area, then piped in compressed air lines and waterlines would not be necessary. The piped in areas actually give a place for fire to breach a refuge chamber and also if the rubber within vic couplings are burnt, this would allow for CO to enter the air line and thus be piped into the refuge chamber. I was also told once by an inspector that we had to have piped in water in order to fight fire with. This goes against the section in 57.11051(a) that says the refuge chamber needs to be of fire resistant material. Also, by the time a person is capable of fighting a fire, it would be too late to do so.

Thank you for your time and consideration.