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On requiring an oxygen regulator at a mine rescue station.

1. Mine rescue teams are already required to carry an SCBA for the victims use. Since it provides pure oxygen it should be considered a resuscitation device.
2. What studies have been shown to prove the airtightness of and oxygen resuscitator. If the atmosphere is saturated with a deadly gas will a resuscitator provide sufficient protection to the victim. Or could poisonous gas reach the victim through the resuscitator.
3. In some states it may be necessary to have a EMT on the team to use the resuscitator. Small mines like ours 30 hourly employees and 3 management on site would find it very difficult to get an EMT since no one on site is currently qualified.

Section 49.6(a)(6)

Number of gas detectors for each gas.

Is it really necessary to maintain 4 gas detectors for each gas. The current standard of two for each gas seems sufficient.

The excuse given that the detectors would require time to recharge and be calibrated does not take into account all brands of detectors. For instance Drager detectors can be equipped with replaceable alkaline batteries that would easily last the 4 hours necessary. Calibration of computer controlled detectors only takes a few minutes usually less than 5. Two detectors for each gas is sufficient.

On multi detectors verses single detectors.

To require only multi gas detectors ignores many pitfalls associated with multi gas detectors.

1. Some multi detectors are dependent on all sensors operating correctly. If a sensor fails you have lost the ability to test 4 gasses.
2. By the same token if you damage or destroy a multi gas detector again in stead of losing the ability to test one gas in a single detector you have lost 4 gasses.
3. As long as you have the correct number of detectors for each gas what difference does it make if you have 4 or 1 detector per trip. We use single Drager Pac 3's and had great luck and have been satisfied.
4. for mine rescue purposes you have 5 people surly they could watch 4 detectors.
5. I hope this is not an attempt to do away with glass tube detectors which are called multi gas detectors but can only test one gas at a time. These glass tube detectors are almost always correct even when electronics fail.

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