



Illinois Association of Aggregate Producers

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Ms. Patricia Silvey
U.S. Mine Safety and Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Blvd, Room 2350
Arlington, VA 22209-3939

Re: RIN 1219-AB65

Dear Ms. Silvey:

The Illinois Association of Aggregate Producers (IAAP) submits the following comments in response to MSHA's February 1, 2010 Request for Information regarding proximity detection systems for underground mines. (Fed. Reg. Vol. 75, No. 20, February 1, 2010). The IAAP is the state trade association representing companies that mine and produce crushed stone, sand and gravel in Illinois. Currently, 265 active aggregate mines operate within Illinois, with 10 of these mines operating underground.

MSHA's February 1st Request for Information (RFI) seeks information from the mining community regarding whether the use of proximity detection systems would reduce injuries and fatalities in underground mines and, if so, how. The RFI further states that MSHA is particularly interested in comments addressing pinning, crushing and striking hazards to miners working near remote control continuous mining machines (RCCMs). Finally, the RFI states that the Agency is interested in whether the application of this technology to other underground equipment might help reduce the risk of injuries and fatalities and, if so, how.

In underground stone mines, workers drill, blast, load and transport fractured bedrock using the same types of equipment in operation on surface stone mines. Unlike underground coal miners, underground stone miners do not operate or work around RCCMs or any other type of remotely controlled equipment. Miners operating the drills, loaders, haul trucks and scalers used in underground stone mines do so within enclosed cabs and are thereby not exposed to the hazards experienced by miners working near remotely controlled equipment. In fact, the IAAP is not aware of pinning, crushing or striking accidents in underground stone mines that could have been prevented by the deployment of proximity detections systems. Therefore, applying proximity detection technology to the equipment used in underground stone mines would not serve to reduce the risk of injuries and fatalities.

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The IAAP is mindful of the need to address injuries and fatalities in underground mines associated with RCCMs. Proximity detection systems designed to de-energize RCCMs may help prevent fatalities and serious crushing injuries when the remote control operator or other personnel get too close to these machines during certain cycles of operation. Yet it is important to remember that the thirty-one fatalities cited by MSHA are associated with a piece of equipment that is not used in underground stone mines. The IAAP submits that the proximity detection technology currently being reviewed by MSHA has no practical application at underground mines that do not use remotely controlled equipment.

It is also critical to bear in mind that underground stone mines are required to use explosives in order to fracture bedded limestone for extraction. 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 detonation cord.

According to the RFI, the proximity detection systems approved by MSHA are a combination of electromagnetic field generators and field detecting devices. Although MSHA analyzed these devices to ensure that these systems will not introduce an ignition hazard when operated in potentially explosive atmospheres, such as those found in underground coal mines, MSHA has apparently not analyzed whether an electromagnetic field from a proximity detection system could set off the electric detonators routinely used in underground stone mines. It is therefore critical that MSHA carefully review the significant hazard posed by introducing this new form of technology into the underground stone mining environment.

I appreciate the opportunity to submit these comments. Please contact me if you have any questions.

Sincerely,



John Henriksen, Executive Director
Illinois Association of Aggregate Producers
CC: IAAP Board of Directors
IAAP Safety Committee
NSSGA