

PUBLIC SUBMISSION

As of: 1/15/16 2:58 PM
Received: January 15, 2016
Status: Posted
Posted: January 15, 2016
Tracking No. 1k0-8neg-108
Comments Due: January 15, 2016
Submission Type: Web

Docket: MSHA-2013-0033

Refuge Alternatives for Underground Coal Mines-Request for information

Comment On: MSHA-2013-0033-0038

Refuge Alternatives for Underground Coal Mines

Document: MSHA-2013-0033-0041

Comment from John Reinmann, Strata Worldwide, LLC

Submitter Information

Name: John Reinmann

Organization: Strata Worldwide, LLC

General Comment

See attached file(s)

Attachments

Comments from Strata Worldwide RIN1219-AB79 DM (2)

AB79 COMM-14

Comments from Strata Worldwide, LLC on RIN 1219-AB79 or Docket No. MSHA-2013-0033:

1. Strata agrees that built-in-place refuge rooms offer several unique advantages as refuge alternatives. Technology is available to use surface supplied air to effectively address the heat and humidity issues with intrinsically safe equipment installed in the refuge room. Strata technology was successfully employed in a 100 person refuge room during a 48 hour manned test in China.
2. Strata has installed several refuge rooms (non-coal) with internal oxygen and CO2 scrubbers as either the primary supply or as a redundant back-up to the surface or mine supplied air. These systems use MSHA Part 7 Approved components and should be included as an alternative to surface supplied air systems.
3. Large capacity refuge rooms need a continuous entry airlock or means to effectively deal with smoke and/or CO that makes its way into the room.
4. Any changes to the minimum spacing or distance from the face for refuge rooms need to also apply to portable refuge alternatives. A proper mine-specific risk analysis should be conducted to determine refuge alternative spacing.
5. Strata believes that properly designed and placed built-in-place rooms could be used as "muster stations" with access to stored SCSR's or SCBA equipment for safe changeover to aid in escaping the mine. The rooms must have a two-way airlock system and access to communication and tracking equipment.
6. Very simple hood technology used with re-chargeable SCBA equipment allows for effective communication without exposing a miner to the harmful atmosphere.
7. Strata believe that the current standards for protection of SCSRs, meant to service shared escape ways, is overly restrictive. We believe that requiring same 15 PSI over pressure and flash fire protection, required for Refuge Alternatives, would actually result in improved protection for miners and SCSR caches without the imposition of further regulatory burdens on the mining industry. Strata believes SCSR Changeover Stations would greatly enhance the escaping miners' ability to reduce risks associated with SCSR changeovers in toxic environments, provide opportunities for planning and communications, as well as rehydration, application of first aid, etc. Modification of the current shared cache requirements could improve miner safety while reducing cost to the industry.