
From: G. Joseph Betar <g.joseph.betar@classicmo.com>
Sent: Wednesday, November 30, 2016 6:27 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: Emailing: Docket MSHA-2014-0031.pdf
Attachments: Docket MSHA-2014-0031.pdf

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Docket MSHA-2014-0031.pdf

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November 30, 2016

RE: Docket No. MSHA-2014-0031

My position is the owner of Classic Motors, Inc. My company is the primary dealer for light and heavy duty non-permissible diesel powered mantrips manufactured by Fiat Chrysler Automobiles under the brand names RAM and Jeep J8. My submission deals with the areas of the RFI that I am qualified to provide information on.

Question A.1:

Currently none of the light duty non-permissible diesel powered mantrips manufactured by FCA will emit less than 2.5 g/hr of DPM as delivered by FCA.

Question A.2:

In order to reduce emissions below 2.5 g/hr of DPM, a suitable aftermarket DPF would need to be installed on all light duty non-permissible diesel powered mantrips manufactured by FCA. The approximate cost to install the type of DPF currently used to meet the 2.5 g/hr DPM standard by my company is \$7,500. This cost does not include the continual replacement of disposable filters. For mines with large numbers of light duty non-permissible diesel powered equipment manufactured by FCA, this would represent significant costs both for the initial installation and subsequent filter replacements.

Question A.3

I looked at the average fleet size of 50 light duty non-permissible diesel powered mantrips which is not uncommon in the mines that my company deals with. I estimate the initial costs for the average coal mine would be \$375,000 for installation of a DPF system for its fleet. I estimate annual filter replacement costs would be \$225,000 for the fleet.

Question A.4

Based on reviewing the list of MSHA approved engines currently installed in most light duty non permissible diesel powered mantrips. I estimate that nearly 100 % of the units will not meet the current EPA emissions standard without modifications but more likely engine or machine replacement would be required.

Question A.5

In my opinion, meeting Tier 4 final EPA standards on existing engines installed in light duty non-permissible diesel powered mantrips manufactured by FCA would require the installation of

essentially the current EPA on-highway emissions control package. There are significant barriers to this retrofit as these electronically controlled engines lack the proper programming to support these systems. Adopting the necessary programming to the existing fleet would require the development of new engine calibrations for each unique model of engine and the costs would be prohibitive. Requiring these engines to meet Tier 4 final EPA standards, would in my opinion force coal mine operators to replace these machines. For a fleet of 50 machines, the cost would be approximately \$3,500,000.

Given the current financial condition of most underground coal mining companies, I believe this requirement would severely cripple the mining industry.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Joseph Betar". The signature is written in a cursive, somewhat stylized font.

G. Joseph Betar
Owner