

Received 6/23/06 MSHA/OSRV

From: Link Derick [LDerick@peabodyenergy.com]
Sent: Monday, June 26, 2006 3:38 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Cc: Dave Beerbower; Dick Conkle; Mike Ludlow
Subject: RIN 1219-AB46 Emergency Temporary Standard

RE: Foidel Creek Mine
ID # 05-03836
Twentymile Coal Company

I wish to add the following additional comment to those presented and submitted on April 24, 2006 and additional comments submitted by e-mail on May 22, 2006. In the May 22, 2006 comments, I concentrated on MSHA's insistence that you cannot enter an airlock area to obtain additional SCSR's. In those comments, we believed that SCSR's should be stored between an airlock that separates one primary intake escapeway for one part of the mine from another primary intake escapeway (Alternate escapeway for first mentioned escapeway) for different parts of the mine.

These comments concentrate on a different concept of entering an airlock. If the airlock was constructed in a sound air tight method and compressed air cylinders were installed where the atmosphere could be purged, at least to a point of clear visibility (possibly a safe air quality) for the transfer from one SCSR to another, why would that not be allowed? This area could have additional escapeway maps and instructions that could be seen. To date, MSHA seems to not be receptive to any entering of an airlock area, unless it functioned as a barricade chamber with a drill hole to the surface. This would truly be a barricade chamber versus the new terminology of "a hardened room" or "safe haven" mentioned in MSHA's opening statement at the public hearings.

Thank you,

R. Lincoln Derick
Technical Safety Manager
Twentymile Coal Company

AB46-COMM-28

06/27/2006