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Docket: MSHA-2019-0007

Direct Final Rule and a Proposed Rule on Electronic Detonators for Use in Metal and Nonmetal Mines

Comment On: MSHA-2019-0007-0001

Electronic Detonators

Document: MSHA-2019-0007-DRAFT-0006

Comment from Gary Wade,

Submitter Information

Name: Gary Wade

General Comment

Caption: Further reinforcement on electronic detonator systems.

Dear Ms. McConnell:

Hello, my name is Gary Wade, and I am a graduate student at Freed Hardeman University. After reviewing the rule and seeing how well the MSHA has handled the situation when pertaining to non-electric, electric, and electronic detonators, I must say that I am impressed. I agree that electronic detonator systems do present the most upside out of the three, and it's by such a wide margin that it is not even disputable. However, I feel that with the research and evidence that has been compiled to represent this fact, for safety measures, there should be a ban on anything that is not an electronic detonator system. In regard to, dealing with something as dangerous as explosives, I feel that, by mandate, anything other than the absolute best, or in this case the safest, should be prohibited. By making electronic detonator systems the only acceptable standard of operation, this could potentially lower the number of accidents exponentially, from where they are now.

It was stated that, through experience, the MSHA had found that electronic detonator systems presented far more advantages than non-electric, and electric detonators respectively. Knowing

this, I believe that there is enough sufficient evidence to make this transition. This transition could not only show benefits when regarding safety, but it could also create dividends financially. The financial benefits that could result from these changes are, less money being spent on producing the inferior alternatives, and also the money that would surface from potential lawsuits and medical fees from the accidents that the other two are more prone to causing. I'm sure that this would be met with some resistance by some entities, especially ones that feel that it is cheaper to use the non-electric and electric detonators. However, as previously stated, I feel that this would be the most lucrative and safest choice when narrowing down the options. So, to wrap things up, I feel the agency did a fine job unearthing these details. However, I feel with just a few minor modifications, the positive impact from this research could become even more potent.