

# PUBLIC SUBMISSION

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Testing, Evaluation, and Approval of Electric Motor-Driven Mine Equipment and Accessories. (PARTS 18 & 74)

**Comment On:** MSHA-2020-0018-0001

Testing, Evaluation, and Approval of Electric Motor-Driven Mine Equipment and Accessories

**Document:** MSHA-2020-0018-0015

Comment from Ulf Liebscher, TV SD Product Service GmbH PS-COM-I-EXS

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## Submitter Information

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## General Comment

Dear MSHA Team

First, I would like to thank you for the opportunity in realising comments on the topic. I am a project manager for explosion protection at TV SD Product Service GmbH in Munich and work also in the German standardization bodies - DKE K 238 "Erection of electrical installations in underground mining" and - DIN NA 095-02-10 AA Working Committee Explosion Protection in Mining and on Combustion Engines as well as the IECEx IEC SC 31M PT 80079-41 "Reciprocating Internal Combustion Engines".

I have 18 years of experience in equipment certification, especially in type of

protection "d" and non-electrical equipment. In both cases I have certified many devices for mining.

My comment:

In principle, I like to agree with the comment of Evans Massey (ABB).

I agree that the restriction to the EPL "da" and "ia" can only be a (spelling) mistake and must be corrected.

The EPL Ma and Mb i.e. "da" and "db" as well as "ia" and "ib" must be considered.

Ma (= M1 in Europe) ensures a very high level of safety, at least 2 independent protective measures of the device are required for this, so that safety is ensured in the event of 2 independent faults in explosive atmospheres.

EPL Ma certifications are known to me exclusively by the application of ignition protection type "i" (60079-11), i.e. "ia", certifications of machines, such as a shearer loader with the EPL Ma are not known to me. The reference to IEC 60079-1 7th Edition, Clause 4.2 with the power limitation of 3.3 W for an Ex "da" application explains this.

I ask you to correct your text accordingly so that it can then be applied in practice.

Kind regards

i. A. Ulf Liebscher

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