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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

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Comment from Thomas Daley,

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General Comment

See attached file(s)

Attachments

UL Comments to MSHA on electric motors in gassy environments



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December 21, 2020

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

MSHA, Office of Standards,
Regulations, and Variances,
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To Whom It May Concern:

UL appreciates the opportunity to respond to the Mine Safety and Health Administration’s (MSHA) proposed rule for Testing, Evaluation, and Approval of Electric Motor-Driven Mine Equipment and Accessories [Docket ID: MSHA–2020–0018]. Hazardous locations and mine safety are not complete without proper fireproofing and explosion protection, safe electrical systems, and transmission systems. Building off of our safety reputation, UL supports our customers and stakeholders in the Hazardous Locations industry with UL standards such as the ANSI/UL 60079 series, Standard for Explosive Atmospheres, and UL’s state of the art hazardous locations safety testing.

Since its inception in 1894, and since its first hazardous locations certification in 1915, UL serves a mission of promoting safe living and working environments for people everywhere and fulfills a promise of facilitating the flow of goods across borders. Grounded in science and collaboration, UL’s work empowers trust in pioneering technologies, from electricity to the internet. We help innovators create safer, more secure products and technologies to enable their safe adoption.

UL applauds MSHA’s recognition of OMB Circular A-119 in the proposed rule, which directs the federal government to rely on private sector bodies for voluntary consensus standards before creating its own unique government standards. Additionally, UL applauds the recognition of the ANSI/UL 60079 series, Standard for Explosive Atmospheres, as a voluntary consensus standard in this proposed rule to advance safety in gassy mining environments and provide protection against fire or explosion dangers. Within the incorporation of the ANSI/UL 60079 series, UL is glad to see specific references to and the inclusion of several different parts of the ANSI/UL 60079 series, including Part 1: Equipment Protection by Flameproof Enclosures “d” (Group I, Level of Protection `da'), Part 11: Equipment Protection by Intrinsic Safety “i” (Group I, Level of Protection `ia'), Part 18: Equipment Protection by Encapsulation “m” (Group I, Level of Protection `ma'), Part 25: Intrinsically Safe Electrical Systems (Group I, Level of Protection `ia'), and Part 28: Protection of Equipment and Transmission Systems Using Optical Radiation (Group I, Equipment Protection Level `Ma').

However, UL does not support MSHA inclusion of non-ANSI standards, such as the IEC 60079 series. The reason for this is because these non-ANSI IEC standards under the IECEx System do not reflect key US explosion safety requirements, such as regarding the following:

- 1) The applicable risk of fire, electric shock and injury to persons requirements: Use of the IEC 60079 series permits self-declaration to these requirements, while the ANSI/UL 60079 series requires 3rd party declaration.
- 2) Wiring methods: Use of the IEC 60079 series permits less robust wiring methods.
- 3) Production control: Use of the IEC 60079 series permits production control at a frequency of only every 18 months.

As the Mine Safety and Health Administration moves forward with its efforts to incorporate voluntary consensus ANSI standards for the Testing, Evaluation, and Approval of Electric Motor-Driven Mine Equipment, UL looks forward to continuing to offer our expertise in proper equipment protection, safe electrical systems, and transmission systems in mines and hazardous locations. If you have any questions regarding this submission, or would like to discuss UL's recommendations further, please do not hesitate to contact Thomas Daley, UL Global Government Affairs, at thomas.daley@ul.com. Thank you for your attention to these comments.

Respectfully,

Michael Slowinske

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