

# United Mine Workers of America



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October 12, 2009

Mr. John Rowlett, Director  
Management Services Division  
Mine Safety and Health Administration  
1100 Wilson Boulevard, Room 2350  
Arlington, VA 22309-3939

Dear Mr. Rowlett:

Attached are the comments of the United Mine Workers of America on the Proposed Information Collection Request for Main Fan Operation and Inspection published in FR 40610 Vol. 74, No. 154, August 12, 2009.

The UMWA appreciates the opportunity to participate in this important rulemaking and asks that you forward our comments to the appropriate person(s) for consideration.

Sincerely,

*Dennis O'Dell* (RRP)

Dennis O'Dell, Administrator  
UMWA Department of Occupational  
Health and Safety

**Comments of the United Mine Workers of America  
On the Proposed Information Collection Request Submitted for Public Comment and  
Recommendations; Main Fan Operation and Inspection  
October 13, 2009**

MSHA indicates that this proposal is part of the Department of Labor's continuing effort to reduce paperwork and respondent burden in accordance with the requirements of the Paperwork Reduction Act of 1995. This proposal provides the general public and Federal agencies with an opportunity to comment on proposed and/or continuing collections of information to ensure that requested data can be provided in the desired format, reporting burden is minimized, collection instruments are clearly understood, and the impact of collection requirements on respondents can be properly assessed. MSHA indicates it is particularly interested in comments that:

- Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;
- Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;
- Enhance the quality, utility, and clarity of the information to be collected; and
- Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submissions of responses.

This proposal concerns the Main Fan Operation and Inspection as follows:

**§ 57.22204 Main fan operation and inspection (I-A, II-A, III, and V-A mines).**

Main fans shall be -

- (a) Provided with a pressure-recording system; and
- (b) Inspected daily while operating if persons are underground. Certification of inspections shall be made by signature and date. Certifications and pressure recordings shall be retained for at least one year and made available to an authorized representative of the Secretary.

**Comment** - This provision of the regulations requires that the main mine fan to be inspected daily to ensure the proper function of the mine fan. It further requires the fans pressure recordings be recorded on fan charts and those records retained for one year. This information does have practical utility and are necessary for the functions of the agency. The mine fan is the life's blood of a mine, providing the ventilation to keep the mine free of dust and gasses. When the fan goes down, the mine must be evacuated. Consequently it is of great importance that the fan be inspected regularly to ensure it is functioning properly. Further, the fan's pressure recordings are plotted on a fan chart and changed daily. The fan chart is of critical importance in the event of an explosion, fire or roof fall. Examination of

the fan chart after such an event will provide an accurate time of the event by checking the pressure changes recorded on the fan chart. The fan chart provides critical information which is regularly made a part of investigation reports after such events occur. It would not be practical to record the fan pressures on a computer. The fan is usually located in an area exposed to the weather and would not be practical for the use of a computer. For these reasons, the UMWA recommends that this regulation remain unchanged.