

# PUBLIC SUBMISSION

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**Docket:** MSHA-2014-0030

Examinations of Working Places in Metal and Nonmetal Mines. 30 CFR Parts 56 and 57

**Comment On:** MSHA-2014-0030-0001

Examinations of Working Places in Metal and Nonmetal Mines

**Document:** MSHA-2014-0030-0038

Comment from brian bigley, NA

## Submitter Information

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## General Comment

The newly proposed rule for workplace inspections creates a logistical and citable nightmare. It is a poorly worded, ill-advised, and badly thought out solution for a problem that does nothing but create a dozen citable offenses every day.

I invite the members of the panel to come to my plant for a single day, and bring their best ideas to the real world. Walk and talk with me in my plant, and I will demonstrate the difficulties every miner will have with the newly proposed rule, in real life. Don't legislate from a cubicle, come visit a working mine site, and see how the regulation would be used in situ. Come see how many citations an inspector could write under the new rule, each and every day. Come work out the logistics of communicating a hazard found to a 24x7x365 workforce, spread across miles of operations. Come meet miner's, and walk in their shoes, as they try to work their way through the morass that would be compliance to this new regulation.

Don't legislate blindly from an office. Come, bring the idea into the real world, walk in the footsteps of the miners impacted, and work out the details in the field. Inspect a work area. Fill out the report. Communicate the hazards. Meet the requirements of the proposed standard,

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yourself. It's the fair thing to do.

I would be happy to host one two, or all members of the panel at my workplace, to allow this experiment to occur.