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Criteria and Procedures for Assessment of Civil Penalties

Document: MSHA-2014-0009-0044 Comment from John Walker, NA

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General Comment

I think penalty calculations should be split out by industry sector and industry fatality statistics per 200,000 man hours worked.

Penalties were increased for all of mining when there were flagrant violations leading to fatalities in the coal sector.

Why should aggregate mining be punished because of Big Coal?

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