

CANTERA CARRAIZO, INC.

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FAX COVER SHEET.**TO:** *Sherid A. McConnell***FROM:** *Alfonso M. Diaz***COMPANY:** *MSHA: 4849 S.R.I. Inc.* **DATE:** *12/20/2014***FAX NUMBER:** *202-693-9441* **TOTAL NUMBER PAGE:** *2***PHONE NUMBER:****(SENDERS REFERENCE:** *30 CFR COMMENTS***)****RE:** *30 CFR PART 100 COMMENTS.***Comments:**

*Attached Please find our comments to Proposed
Changes to 30 CFR PART 100.*

Thanks for your Consideration.
[Signature]

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AB72-COMM-44



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December 30, 2014

Sheila A. McConnell, Acting Director
Office of Standards, Regulations, and Variances, MSHA
1100 Wilson Boulevard, Room 2350
Arlington, Virginia 22209-3939
MSHA-comments@dol.gov

Re: Cantera Carraizo, Inc's. (MINE ID: 54-00019) Support to The Asociación de Industrias Productoras de Agregados de Puerto Rico Comments to MSHA's Proposed Rules to 30 CFR Part 100. **Criteria and Procedures for Assessment of Civil Penalties.** RIN 1219-AB72, Docket No. MSHA-2014-0009

Dear Director:

I appreciate the opportunity to comment on such an important issue as metal/non-metal mine.

I am aware that The Asociacion de Industrias Productoras de Agregados, AIPA, Puerto Rico's only trade association representing manufacturers of aggregate products, cement, lime, among others, will submit a write up implementing important topics that concern us about these proposed rules. As one of AIPA's member, I strongly support their comments in regards to the proposed rules to 30 CFR Part 100.

I strongly agree with the fact that this proposed change will not simplify the civil penalty enforcement process as it suggests. In turn it will motivate operators to appeal thousands of citations through the administrative process or the federal court system.

As a small example of what will be discussed in AIPA's write up, I also agree with them that:

1. PART 100 Table X should be modified to always leave High Negligence as an alternate to Reckless Disregard.
2. I support the change of Table XI in joining Unlikely and No likelihood with zero points

As you may understand, there are many items that have been discussed as operators that will affect us if these proposed changes are approved, therefore, I rest on AIPA's write up to summarize our position as an industry in Puerto Rico.

Thank you again for the opportunity,

Regards,


Alfonso M. Diaz
Vice-President
Cantera Carraizo, Inc. MINE 54-00019