

# 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-2014-0030-0129

Examinations of Working Places in Metal and Nonmetal Mines

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Comment from Charles Rea, CalCIMA

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## General Comment

The California Construction and Industrial Materials Association (CalCIMA) supports extending the effective date to July 24. CalCIMA is the state association for aggregate and industrial mineral industries in California. We believe there are several good reasons for a delay in the effective date:

- 1) there was initial confusion on whether the regulation was promulgated or not, given that it was at the publisher as Administrations changed. Thus, there was considerable confusion as to whether it was legally promulgated or not.
- 2) there have been widespread reports of a regulatory freeze
- 3) the final regulation differs from the proposed regulation. Thus, there was no opportunity to fully review the final proposal and its implications.
- 4) Due to the issuance of the regulation as Administration's changed, there has not been the opportunity for the full roll-out of training materials and education that would normally be associated with a new rule.
- 5) Given that the new rule is a significant change in a long-standing standard, and affects every day work practices, it is important to have sufficient time for the changes to be understood, training materials provided, tracking systems and procedures developed, and personnel trained.

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In conclusion, we support the proposed extension of the compliance date, and believe it should be as long as necessary to appropriately develop compliance assistance and training materials and disseminate those to the mining industry.