

# 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-2014-0030-0179

Examinations of Working Places in Metal and Nonmetal Mines - Proposed rule, limited reopening of the rulemaking record; notice of public hearings; close of comment period.

**Document:** MSHA-2014-0030-0238

Comment from Garry Clark, International Brotherhood of Boilermakers, et. al.

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## Submitter Information

**Name:** Garry Clark

**Organization:** International Brotherhood of Boilermakers, et. al.

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## General Comment

The workplace examination regulation proposal causes miners to perform labors of mine inspectors, and while I initially opposed the proposal, I recognize benefits too.

It is reported that MSHA has a \$397 million budget while employing 1,000 employees. With miners performing the labors of mine inspectors, it is conceivable that the number of MSHA employees could be reduced to 50 with one employee for each state with projected budget being \$19,850,000 annually proving as a savings of \$377,150,000 that could fund tax cuts.

With miners having to perform labors of mine inspectors while reporting violations to mines, the Mine Act would need to be amended removing the semi-annual inspections given the mines are being inspected every day by miners.

The plans of Assistant Secretary Patricia Silvey and Deputy Assistant Secretary Emily Hargrove can be used significantly to improve mining while reducing taxes at expense of jobs for government employees is a good idea that needs full consideration.

I thank you!

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