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To: zzMSHA-Standards - Comments to Fed Reg Group

Subject: Use of or Impairment from Alcohol and other drugs on Mine Property

I a Montana State MSHA grant safety trainer and worked 8 years as an underground miner hardrock miner in Northern Nevada and have some thoughts on this. We worked 11.5 hour shifts and spent another 3 hours travel time per shift. I would leave my house at 4:00 am and arrive back home at 8:30 pm. This shifts rotated between days and nights as follows. 3 days, 11/2 off, 3 nights, 2 off, 4 days 3 off, 4 nights 7 off. This resulted in never being able to adjust to night or day and combined with the long shifts caused alot of problems in the work force. A very large proportion of that workforce were perscribed ssri's such as paxel, prozac, zoloft which often resulted in more fatigue. Many of my co-workers would regularly take over the counter stimulants no-doze, minithins, diet pills or decongestants just to make it thru their shifts. In some cases miner's would consume alcohol to go to sleep as they were still affected by stimulants when the shift was over. If a miner got home at 8:30 and stayed up drinking for 3 hours he would have been lucky to get 4 hrs of sleep before his next shift. This is not long enough to metabolize the alcohol or to be well rested before the next shift. This situation leads to more stimulant taking the next shift and again more alcohol consumption. Many underground miners are depressed and angry due to the lack of sleep, rotating shifts, length of shifts, lack of sunlight and time constraints. One of the big problems as I found out were these schedules. There is no way to adjust to the constant day and night changes. Those affected by this do not realize until they have a alcohol/drug problem or until they have lost there familys because of temper or behavior problems or have been put on antidepressants. Another issue is that many miners suffer from some from of cronic pain either from work related injurys or toxification. Every lunch box had the same things in it, tums/rolaids, aspirin/tylenol/ibuprofin, caffine/stimulant pills. Underground mining was the hardest job I have ever had, not because of the work but because of the schedules. Try running a jackleg for 10 hours on your 4th night shift after getting 4-6 hours of sleep for the last 4 days, you havent seen your wife or you kids for more then a few minutes in the past week cause they are in school/working and you bought all the food you will eat for the 16 hours you are away from home at a gas station. Over the years this type of situation can cause alot of problems. Drug and alcohol abuse are coping mechanisms used to self medicate. Add the 24 hour availibility of alcohol in Nevada and its a big problem. Shift changes, travel time, lifestyles are all components that need to be looked at. Employees need to have a life besides work and with out good sleep and reasonalbe shifts this just doesnt happen. Yes we had 16 days off a month and thats great except that 3 of those days are spent sleeping or laying around after night shift, 3 more days before night shift and add a couple of days of overtime thats about it. Please take my thoughts into consideration as I know what I'm talking about.

Thankyou
Eric Johnson

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