

# PUBLIC SUBMISSION

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**Docket:** MSHA-2008-0014

Alcohol-and Drug-Free Mines: Policy, Prohibitions, Testing, Training, and Assistance

**Comment On:** MSHA-2008-0014-0001

Alcohol- and Drug-Free Mines: Policy, Prohibitions, Testing, Training, and Assistance

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Comment from Gary Perrey, Columbia Quarry Company

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## General Comment

I believe part 66.400 (b) will create tension and labor issue, union and non-union, if management cannot terminate employees for drug and alcohol abuse. It has been my experience that very few drug users will be rehabilitated in the mining environment. The individual will typically stay "clean" for the required period and then slowly return to a user. This creates a safety issue within the mining environment that could have been prevented with termination. Also, most drug users will also have additional poor work habits and a positive random drug screen should be just cause for termination. Part 66.202 - Education and awareness program for nonsupervisory miners - It is my experience that the general populace, including miners, are well aware of drugs in the workplace. This part is excessively wordy and will do nothing in preventing workplace drug abuse. Miners need to be instructed in the policy and their accountability.

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