

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

Document: MSHA-2008-0014-DRAFT-0011

Comment from Jim Rodine, Steam Beer Mining LTD

Submitter Information

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General Comment

I strenuously object to the proposed rule for the following reasons:

1. Existing regulations are already in place for alcohol and narcotic use in mines.
2. The proposed rule would place an undue burden on mining operations, at an excessive cost, with no proven benefit to mining. (although it would add another bureaucratic administrative layer)
3. The proposed rule would apply to all mines regardless of size. For example, our mine operates intermittantly with 2 part-time employees. The proposed rule would add significant costs to our operation, with questionable, if any, increase in safety.
4. Reference is made in the proposed rule that some mining communities have alcohol or drug problems. This is a problem for society and not one properly addressed by MSHA by regulating mine operators.

Therefore, I request that RIN 1219-AB41 not be adopted but dismissed.

Respectfully submitted by: Jim Rodine, CEO, Steam Beer Mining LTD

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