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**To:** zzMSHA-Standards - Comments to Fed Reg Group  
**Subject:** RIN 1219-AB41

Greetings,

I am writing in support of the proposed MSHA requirement that all mines institute a standardized "Drug Free Workplace" policy.

As a psychotherapist, I have worked for many years with people who abuse or are dependent on alcohol and drugs. A person even mildly impaired by alcohol or drugs has reduced physical and mental capacities and a person withdrawing from alcohol or drugs also experiences deleterious physical and mental effects.

Alcohol, cannabis and opiate use causes decreases in physical response, balance and coordination. Slowed reaction time, depressed reflexes and staggering gait may be observed. Sedation may occur, mental responses retarded and the ability to focus on and track information reduced. Judgment is hindered. Alcohol may disinhibit a person and affect memory and reasoning. When withdrawing from alcohol, one may experience nausea, vomiting, head ache, lethargy, shakes and, not uncommonly, seizures. Withdrawal from opiates is characterized by tremors, body aches, vomiting, diarrhea, physical weakness, hot and cold flashes. Mental effects of alcohol or opiate withdrawal may include depressed mood and apathy.

The effects of abuse of stimulants such as methamphetamines, crystal meth and crank may include agitation, irritability, panic, tremors, compulsive fascination with repetitive tasks, psychosis, excessive excitability, involuntary body movements, suicidal thoughts and shortness of breath. Methamphetamine withdrawal is associated with exhaustion, confusion, restlessness, anxiety and cravings.

Cocaine (or crack) use or abuse may cause physical symptoms such as dizziness, tachycardia and hallucinations. Because it is a basal constrictor, cocaine may cause stroke. Mental symptoms of cocaine use or abuse include agitation, panic and paranoia. Impulsive or aggressive behavior may be shown. Characteristics of acute cocaine intoxication are similar to those of psychosis. Symptoms of cocaine withdrawal include agitation, depressed mood, extreme fatigue, panic, angry outbursts, lack of motivation, shaking, irritability, muscle pain, cravings, restlessness and psychosis.

Because miners in either surface or underground mines work with heavy equipment, power tools, machinery and explosives, they need complete control of their physical and mental faculties at all times. When manifesting symptoms such as those as described above, they pose risk of harm or death to themselves and others, as well as loss of time, material resources and money to their employers. Alcohol and illicit drug use are at cross purposes with control of physical and mental faculties necessary for mine safety. Strictly enforced "Drug Free Workplace" policies will serve as a deterrent to alcohol and drug use. Accordingly, an MSHA policy requiring mines to institute "Drug Free Workplace" policies makes sense.

Thank you.

MJ Dow, LPC

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