

**SUBSTANCE ABUSE SUMMIT, “Keeping America’s Mines Drug- and Alcohol-Free”**

December 8, 2004

Hazard, KY

**Alpha Natural Resources-John Schoolcraft**

On behalf of Alpha Natural Resources, LLC I would like to express our appreciation for the opportunity to participate in this program today and, like others, commend MSHA, the states of Kentucky, Virginia, and West Virginia for planning and setting up the meeting.

We, like other companies, do drug screening in several situations; we do post offer, pre-employment drug screening; we do “for cause” screening; we do post accident screening; we do random screening; and we do screening of employees who have been off work in excess of 30 days.

Most companies, such as those represented here, do some or all of the screening listed above. There are certain difficulties associated with each of the above screenings. With pre-employment, there are products on the market that will allow an individual to “mask” drug use and thus pass a screen, particularly if notified sufficiently in advance of the screening; with “for cause” testing, it is difficult to keep supervisors trained in order to spot those who may be candidates for a “for cause” screen”; with post accident, you must determine what types of accidents, who all will be screened, etc.; with absences in excess of 30 days, those employees who want to defeat the screen have access to previously mentioned over-the-counter products that virtually guarantee a clean drug screen; random screens offer the best

method for identifying those individuals who may have a substance abuse problem, or who have been using drugs recreationally.

Some of our companies, like other companies at the meeting, have an employee assistance program. We are willing to help those individuals who come forward prior to screening and request help; however, if we have shown up on the property to conduct a random screen and the individual comes forward at that point, it is too late to seek assistance at that point.

Some of the problems that we encounter in overcoming substance abuse issues include: proliferation of prescription pain medication; the apparent availability of illegal substances; prescription medications that individuals have been instructed to take only during non-working hours; and drug “clean-up” products that are available through the Internet and locally at various retail stores. A recent incident with another company involved individuals being able to purchase the “clean-up” product at a local store in Cumberland, KY. These substances serve only one purpose and should be illegal, not something that you buy over the counter at a local store!

Part of our problem with this is when a physician prescribes medication and tells the individual to take the medication only during non-working hours; how do you (physician or employer) ensure that this is how the prescription is being taken. You also face the problem of individuals “sharing” prescriptions. We have taken the position that if you are taking someone else’s prescription that this constitutes an illegal substance for you.

There are difficulties in overcoming a substance abuse problem even with those individuals who may be very motivated to do so. If an individual successfully completes a treatment program, and then goes back to same environment which he/she left, then the temptation to abuse again is probably immediately available. When this individual returns to the same group of friends/family (who may be users or enablers) it is difficult, at best, to follow the after care recommendations of the treating facility.

Substance abuse is a cultural issue and until we see abuse viewed as a culturally unacceptable behavior we will continue to have these kinds of problems. As a society we must find a way to confront and address these issues. One group that plays a major role in this problem is not present in our audience today, and that is the medical community. We must have the assistance of this group if we are ever able to overcome the substance abuse problem.

One of the real concerns that we all have is the individual who fails a drug screen at one company and goes on to another company goes to work for the second company. We must be able to identify these individuals (so that they can receive help in overcoming the problem). Addressing that issue should be one of the concerns of any group that would come together as a result of this meeting.

We may have to make some changes in Annual Refresher Training so that Substance Abuse Training can be included in that training; this may require a change in the regulations, but if this is what is necessary to help alleviate the problem, then it should be done. Another method we may use to help us

overcome the problem is to educate and seek the support/involvement of medical providers.

One thing that we should keep in mind as we seek to eliminate this problem is that we had better be committed to our cause because the drug business, both legal and illegal is big business; there's lots of money involved and if we address the issue, we will have a fight on our hands.