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The Energy People

September 13, 1993

SEP 14 1993

Dr. Richard W. Neimeier, PH.D.  
National Institute for Occupational  
Safety & Health  
Robert A. Taft Laboratories  
4676 Columbia Parkway  
Cincinnati, OH 45226-1998

Re: Draft "Criteria for a Recommended Standard: Occupational Exposure to Respirable Coal Mine Dust"

Dear Dr. Neimeier:

We have reviewed the Draft Criteria Document and are hereby expressing our concern with the conclusions drawn by NIOSH in the form of draft recommendations to lower both the coal mine dust standard and the crystalline silica standard.

We believe reliable coal dust exposure data in the United States was not available for coal miners until after 1969. We further believe that only when this data is properly analyzed and isolated from confounding variables such as smoking and other significant exposures to aerosols that a dose disease relationship can be established. We also believe there is significant evidence to indicate exposure to coal dust below the existing standard does not impair pulmonary function significantly from the non-exposed population. There seems to be no attempt by NIOSH to identify acceptable risks to coal miners vs. risks to other populations only to try to arbitrarily force the risk to zero. This rationale is seriously flawed and cannot be scientifically supported.

NIOSH must base any recommendation for change to exposure limits on reliable data which supports scientific findings of statistically significant risks.

We recommend the critique of other health professionals be utilized in reassessing your draft recommendations.

Sincerely,

Glen A. Zumwalt  
Senior Vice President  
Coal Development

**ANR Coal Company**

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