

NATIONAL  
COAL  
ASSOCIATION

**COAL**

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July 8, 1993

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Dr. Richard W. Niemeier, Ph.D.  
Director  
Division of Standards Development  
and Technology Transfer  
National Institute for Occupational  
Safety & Health  
Robert A. Taft Laboratories  
4676 Columbia Parkway  
Cincinnati, OH 45226-1998

Dear Dr. Niemeier:

On behalf of the members of the National Coal Association, who are responsible for approximately 70 percent of our domestic coal production, I am writing to request that the meeting planned for July 29-30 in Cincinnati to review the draft criteria document for a recommended occupational exposure limit to respirable coal dust be canceled and that parties be provided with at least an additional 60 days to review the draft before the meeting is rescheduled. Additionally, we request that the August 13, 1993 deadline for the submission of written comments be extended for 6 months following the public meeting.

The draft document raises significant technologic, economic and health related concerns which will require several weeks, if not months, to be analyzed credibly. While we share NIOSH's desire to see that miners are adequately protected against the possibility of contracting pneumoconiosis, we are appalled that the agency would provide affected parties with just slightly more than 30 days to provide comments. Our copy of the draft was received on July 7, a mere 22 days before the scheduled meeting. It is virtually impossible to provide a meaningful and thorough response to this report, years in the making, in so short a time.

NIOSH owes it to all parties to provide adequate time for comprehensive analysis and response. Unfortunately, the slapdash process NIOSH has proposed for soliciting comment on such a vital health issue seriously undermines the scientific and professional credibility of the agency.

We look forward to receiving your prompt and favorable response to this request.

Sincerely,

  
Bruce Watzman

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