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Review of Current Intelligence Bulletin: A review of information published since 1995 on coalmine dust exposures and associated health outcomes.

Review: This reviewer found that the document and supporting data did not support the recommendation in the CIB and CCD for lowering the standard from 2.0-mg/cu meter to 1.0 mg/cu meter for two reasons.

1. The exposure data comes from both MSHA and mine operator samples. These samples are collected on five production shifts during one week every other month for a total of 30 samples for the year. These can be personal, occupational or area samples. The sample time is limited to 8 hours regardless of the shift lasting as long as 10 to 12 hours. The existing regulatory program represents about a 12 %, at best, representation of a miner's exposure for the year.

CIB and the CCD seem to assume that the nations coalmines are in compliance with the existing standard yet it is known that there is a level where the applicable standard is exceeded.

The CIB acknowledges that there are multiple factors that may explain the increase in CWP prevalence. Yet the CIB recommendation only

addresses lowering the standard in spite of not having a sound basis for the level of exposure.

2. The CIB does not identify the increase in CWP prevalence as an industry-wide problem across all coal regions, but more of a localized problem. Given the above, it would appear that the best course of action would be to concentrate efforts on the "hot spots" to determine the cause or causes of the increase in the prevalence of CWP. Nothing in the CIB or CCD addresses the exposure issue or any of the other issues that may be a contributing factor in the local regions. Other issues not mentioned are mining methods, production levels and ventilation methods. All coal regions are being painted with the same brush.

Using the same logic, if other regions are not showing an increase in the prevalence of CWP, does that not mean that the present standard is adequate? These other regions that show a decline in CWP, such as District 8 and 10, have higher production per shift than the hot spot regions. The recommendation needs to deal with the personal exposure of the miner on each production shift. This coupled with the new sampling technology that gives real time exposure data will provide the means to measure and control the miner's exposure during the production shift.

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