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Mr Ralph D Zumwalde
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Dear Mr Zumwalde

Thank you for the opportunity to review the draft criteria document for occupational exposure to respirable coal mine dust. As you would appreciate, I found the task of reading and absorbing such a voluminous document very time-consuming, hence my delay in responding to you with my comments. I trust this delay has not negated my input.

Perhaps the best way to commence my comments is to aquaint you with the current situation here in Australia. Australia is a Commonwealth of six States and two Territories in which coal mining is conducted in all the six States on varying scales. The smallest State (Tasmania) has only one or two underground coal mines; Victoria and South Australia have large sources of brown coal which is mined by open cut methods and supplied to government operated power stations; Western Australia has a coalfield of some significance in the south-west of the State, using underground and open cut methods; Queensland and New South Wales have vast reserves of high quality metallurgical and steaming coal, mined by underground and open cut methods. These last two States would account for 95% of Australia's black coal production. My own experience has mainly been in regard to the NSW coalfields through family and professional contacts. My father was a colliery undermanager and since graduation from university I have maintained professional involvement with the industry over the past 30 years.

With respect to NSW, monitoring of respirable dust levels have been conducted in every operating panel (section) of every underground coal mine since 1943. These samples were originally collected by using the Owens Dust Gun to obtain samples at appropriate locations (eg adjacent to the miner driver) throughout the mine. These samples were collected by approved laboratories and the Joint Coal Board (a combined Union, Management and Government statutory authority charged with overseeing the health of coal miners in NSW) and the 1-5 micron particles counted by oil immersion microscopy. In 1967 a dust standard of 175 particles/cc was introduced which was maintained until 1984. In March of that year, a respirable dust standard was proclaimed of 3.0 mg/m^3 (adjudged equivalent to 175 pp/cc) using gravimetric sampling. This standard was specified in the NSW Government Gazette No. 44