

MARCUS B. BOND, M.D.

OCCUPATIONAL MEDICINE
1711 ARBUTUS STREET
GOLDEN, COLORADO 80401
(303) 232-7832

August 2, 1993

National Institute for Occupation NIOSH Safety & Health
200 Independence Avenue, SW
HHH Building, Room 714B
Washington, DC 20201

Re: NIOSH Draft Criteria Document on Respirable Coal Dust 6-14-93

Dear Sir:

It is not appropriate for NIOSH to have a role in the medical surveillance of coal workers as proposed in the Criteria Document. The NIOSH proposal greatly increases the direct involvement of NIOSH in routine medical examinations "at NIOSH approved facilities" without describing what such a facility must be or do, and it provides that "NIOSH will evaluate the test results (of the medical examinations), conduct follow-up and store the records." This is not the proper function of NIOSH and is in contrast to any existing or other proposed method of assuring appropriate medical surveillance of U.S. workers.

The proper method for obtaining and assuring medical surveillance examinations to protect the health of coal miners is for NIOSH to make recommendation to MSHA which will then issue the proper regulations to employers of coal miners. If employers are required to provide preplacement and periodic medical examinations by MSHA regulations, based in part on NIOSH recommendations, this will stimulate employers to provide medical programs of good quality to enhance existing medical programs to include general health education, nutrition, fitness and other wellness promoting activities. It will also permit longitudinal studies of the health of employees as related to work exposures and other factors.

The proposed requirements for pulmonary function testing and smoking and other tobacco use cessation programs are appropriate and many coal mine employers already provide these benefits. An occupational hearing conservation program is also provided by some employers but is not addressed by NIOSH.

August 2, 1993

Page -2-

The NIOSH proposal states that medical examinations must be done by physicians. Occupational health examinations now are often done by other licensed and properly trained and certified health care professionals, i.e., Nurse Practitioners, Nurses and Physicians Assistants. It would be better for NIOSH to include such persons to do medical examinations.

I am trained and certified as a specialist in Occupational Medicine, am trained in the interpretation of chest x-rays for pneumoconiosis and am a Consultant in Occupational Medicine for ARCO Coal Company.

Yours truly,

A handwritten signature in cursive script, appearing to read "Marcus B. Bond, M.D.", with a large, stylized flourish at the end.

Marcus B. Bond, M.D.

MBB:lh

cc: Senator Ben Nighthorse Campbell
Senator Hank Brown
Representative Dan Schaefer