bcc: L. J. Barghini - LT & CV - 230-1
V. J. Caruson - LT & CV - 220-8V
C. H. Hodgson, M.D. - Medical - 220-13V

December 5, 1968

Mr. Marvin E. Kennebeck, Jr.
Industrial Hygienist
Sentry Insurance
Stevens Point, Wisconsin 54481

Dear Mr. Kennebeck:

I am somewhat at a loss as to why the 3M Filter Mask Guide was attached to the brochure which you received. The Guide was prepared for internal use by our sales personnel and was not intended as a piece of advertising material. It has been our policy in the advertising and the sale of the 8500 Mask to insist that it only be recommended in operations where a nuisance-type dust may be involved. Because questions frequently come to our sales personnel which they cannot answer, we have prepared the list to which you have referred. In addition, the salesmen have been instructed that if they are in doubt about the use of the 8500 Mask they should contact the St. Paul office regarding a recommendation. I think without question if there has been any indication that the dust exposure might result in an occupational disease, the recommendation has been that only U. S. Bureau of Mines approved respiratory protection be used.

You mention that you felt that this list tended to mislead the user and gave several reasons. The 8500 Mask is only recommended for use where particulates are the contaminant. This excludes the use of the 8500 Mask from any area where the air contaminants may include gases, fumes, or vapors. Furthermore, we have recognized that there may be a percentage of free silica in many otherwise innocuous dusts. This we have tried to indicate on the list so that our sales personnel can warn the user against utilization of anything other than the Bureau of Mines approved respirator under those situations.

You specifically mentioned cotton as another use where pneumoconiosis has resulted from exposure. I am sure you are aware that the recommended Threshold Limit Value for cotton is based on studies conducted in England. Two reports by the U. S. Public Health Service, Bulletin No. 207 and Report No. 58, indicate that cotton dust itself, at least in the United States, has not been responsible for byssinosis. In the latter report, it was found that a gram negative micro-organism occurred in large numbers in certain grades of cotton. It was felt that this was responsible for the disease rather than the cotton dust itself. In either

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case, our recommendation would be engineering control of excessive dust concentrations.

In Paragraphs 2 and 3, you take exception to the suggestion that the user be responsible for determining the percent silica in materials as well as whether there is a fume or a metal dust present. We have no way of determining what conditions are in our customer plants. This is a responsibility that must be assumed by the user.

There is no question that occupational health hazard evaluations can only be made by a well-trained and qualified industrial hygienist. It is our firm conviction that control measures should be substitution of a less toxic material where possible, or separation of the employee from the harmful environment. In the latter case, this should be by engineering methods. If this proves to be impracticable or impossible, then personal protective equipment is indicated. It is also our conviction that in cases where toxic materials are used, that Bureau of Mines approved respirators should be recommended for protection against the specific compound or class of compounds. We feel that the 8500 Mask is a useful tool for respiratory protection against nuisance-type dust. Since we are not in a position to evaluate the hazard of our customers, we have tried to advise conservatively as to use of the 8500 Mask. It has certainly not been our intent to try to mislead anyone in the use of the 8500 Mask.

I hope this has answered some of your questions and if we can be of any assistance to you we would be happy to do what we can. I might also add that in view of your inquiry and your reference to our Guide as advertising, we are seriously considering the addition of several clarifying statements to the present Guide.

Sincerely,

John A. Pendergrass
Manager, Industrial Hygiene

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