

JJH: JCL: TGG: (RF)
XF: hcc?

TO: Sid Pitts

FROM: T. G. Grumbles
DATE: August 22, 1984

SUBJ: OSHA EO STANDARD: EMERGENCY PLAN RESPIRATORS

Interoffice
Communication

VISTA

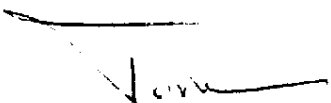
I have reviewed paragraphs (g) and (h), and Table I of the EO Standard. Based on that review, reading the applicable background sections in the preamble (pp. 25780-25784), and discussions with other users of EO, suitable escape respirators would not be required for all personnel potentially affected by an emergency release.

Paragraph (g) requires respiratory protection be available for specific operations, including emergencies. That paragraph also specifies that respirators, when used, be selected as specified in Table I. Table I does include an escape designation, allowing any respirator in the table to be used for that purpose.

Paragraph (h) requires that a written emergency plan be developed which specifically requires that employees engaged in correcting emergency conditions be equipped with proper respiratory equipment. Also a notification system must be developed to alert potentially affected employees. Other affected employees shall be evacuated.

These paragraphs, when considered together, should not be construed to require the availability of approved escape respirators for all potentially affected employees. As we discussed, in a worst case situation, depending on weather conditions, this could be employees in a very large area of the plant. In practice, if proper equipment is available in the EtO unit for operator emergency response, maintenance personnel responding have equipment available, and a notification system is used to alert potentially affected personnel remote, or downwind, from the release point to begin evacuation procedures, we would be in compliance with the standard requirements. In theory, proper evacuation procedures should prevent excessive exposures.

The written emergency plan should clearly state procedures to accomplish the above.


Thomas G. Grumbles

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