GENERAL OFFICES • 3M CENTER • SAINT PAUL, MINNESOTA 55101 • TEL. (612) 733-1110

January 19, 1977

File vinyl chloride

FEB 2 1977

Allied Chemical Corporation
Mr. W. C. Koch
Manager, Occupational Health
P.O. Box 1139R
Morristown, NJ 07960

Dear Mr. Koch:

On Monday, January 17, 1977, the Assistant Secretary of Labor for OSHA signed a field directive to all inspectors instructing them not to site any company using the 3M Brand Vinyl Chloride Respirator No. 8716 to protect employees from vinyl chloride monomer at concentrations up to 10 ppm.

The 3M Respirator is a half-mask, valveless, self-indicating respirator designed specifically for vinyl chloride workers. Completely disposable, it will eliminate costly respirator inspection and maintenance programs.

Attached you will find a copy of the program directive covering the 3M Vinyl Chloride Respirator. For more information, contact your closest Occupational Health and Safety Products sales representative listed on the attachment or call (612) 733-8465.

Sincerely,

W. P. Herris

W. P. Herris
Market Manager
Occupational Health & Safety
Products Department

WPH:l

Attachment

ASI 00022820

U.S DEPARTMENT OF LABOR
Occupational Safety and Health Administration
WASHINGTON, D.C. 20210

19 JAN 1977

Office of the Assistant Secretary

MEMORANDUM FOR REGIONAL ADMINISTRATORS AND AREA DIRECTORS

Thru : Donald E. MacKenzie, Acting Director, Field Coordination

From : Morton Corn, Assistant Secretary of Labor Morton Corn

Subject: Use of the 3M Cartridge Respirator (Model 8716) in Vinyl Chloride Atmospheres

1. Purpose. To provide guidance concerning the enforcement of Section 1910.1017(g)(4) as it relates to use of the 3M cartridge respirator.

2. Directives Affected. None

3. Background. Section 1910.1017(g)(4) requires that respirators used in vinyl chloride atmospheres be approved by NIOSH. To date no respirators for 10 ppm vinyl chloride or less have been approved. The 3M Company has developed a disposable cartridge respirator with a service life indicator for use in atmospheres of 10 ppm vinyl chloride or less. Because this respirator is not equipped with an exhalation valve, it cannot be tested by NIOSH, which requires an exhalation valve, until NIOSH's procedures are revised.

In the interim, test data collected by the 3M Company concerning this respirator has been studied and OSHA has conducted its own fit tests at the Los Alamos Scientific Laboratory.

Based on the information from the tests which have been conducted, it has been determined that the 3M disposable cartridge respirator is acceptable for two hour use in atmospheres of up to 10 ppm vinyl chloride.

As with any respirator, the degree of protection provided depends heavily on the adequacy of the respirator program, including the fit of the respirator and enforcement of the service life requirements. Therefore, the requirements of Section 1910.134, which contains the OSHA standards for a respiratory protection program shall be adhered to. Particular attention should be paid to the applicable requirements of Sections 1910.134(e) and (f).

In addition, the employer should maintain a written record of employees using the respirator and the amount of time that each respirator is worn.

4. Action. Citations should be issued under Section 1910.134 as necessary. However, until final certification by NIOSH, the use of the 3M respirator (Model 8716) in vinyl chloride atmospheres of 10 ppm or less for periods not exceeding two hours per respirator shall be cited as de minimus.

5. Effective date. This directive will become effective immediately and will remain in effect until NIOSH tests the respirator and issues its conclusions, or until revised or modified by OSHA.

ASI 00022822