U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration
Columbus Area Office - Region V
Federal Office Bldg., Room 634
200 North High Street
Columbus, Ohio 43215

October 19, 1978

Mr. Edward J. Laubusch, Technical Manager
The Chlorine Institute, Inc.
342 Madison Avenue
New York, NY 10017

Dear Mr. Laubusch:

I found your letter on the use of respiratory protection in areas of chlorine exposure very interesting. Your letter, as you recall, was in reference to an OSHA Citation (M4463-513) for violation of 29 CFR 1926.103 (a). You stated in your letter that your interpretation of Table E-4 under this section does not mandate the use of full-facepiece respirators.

Examination of Table E-4 reveals that under the "Hazard" column, chlorine falls under the classification of "Gas and vapor contaminants immediately dangerous to life and health". The respirator requirement for this hazard category does, indeed, permit the use of a self-rescue mouthpiece respirator for escape purposes. However, it is a recognized hazard that chlorine gas is highly irritating to the eyes. This fact is further supported by the National Institute for Occupational Safety and Health (NIOSH) Recommended Standard for exposure to Chlorine: (HEW Publication No. (NIOSH) 76-170), and Occupational Diseases: A Guide to Their Recognition (D-HEW Publication No. (NIOSH) 77-181).

The reason OSHA has required, in this particular citation, full-facepiece respirators is for eye, as well as, respiratory tract protection. Escape from the area of a chlorine leak may be seriously hindered by the irritating effects of chlorine in the eyes.

Your considerations you have expressed are, in some situations, valid but in the case of chlorine, I believe full-facepiece respirators to be the best means of protection.

Should you have any further comments or questions on this subject, I would be happy to discuss them with you.

Sincerely,

For Thomas E. Levenhagen
Area Director

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