



INTERNAL CORRESPONDENCE

CHEMICALS AND PLASTICS

TO (NAME) Mr. J. B. Leverton
COMPANY
LOCATION Texas City Plant

COPY TO Mr. D. E. Deese
Mr. M. E. Eisenhour
Mr. W. A. Mazzolini
Mr. F. S. Provenzano
Mr. R. N. Wheeler, 514

SUBJECT 3 M Brand Vinyl Chloride
Respirator No. 8716

UC 149-2

Jim - f y i. D

think we're almost

home! Let's wait

P. O. BOX 471, TEXAS CITY, TEXAS 77590

for U/A also.
DATE February 10, 1977

(2) WAM

Dear John:

This letter with its attachments from the 3 M Company follows up on my letter to Mr. D. E. Deese of November 24, 1976, on the same subject. As you can see, 3 M has obtained OSHA approval (of sorts) for use of their half-mask respirator in VCM concentrations up to 10 ppm for two hours. As I indicated in my earlier letter, these masks would be useful for us in light VCM exposure situations.

However, before ordering any for use in the Suspension PVC Unit, I'd like U/A from your department. As I understand the directive, OSHA states that the respirator is acceptable for two hour use in atmospheres up to 10 ppm VCM, but they also state on Page 2 that use of the respirator shall be cited de minimus, which I interpret to mean a non-serious, no fine citation. Would you get something from our legal people on this.

I do know that other PVC producers, notely B. F. Goodrich, have been using for a year or more half-face respirators in atmospheres up to 10 ppm VCM on the basis of a letter written to B. F. Goodrich by an OSHA official.

A prompt reply is requested.

Very truly yours,

R L Frantz
R. L. Frantz

RLF/st
Attachments

UCC 091999



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

January 19, 1977

Union Carbide Corporation
Mr. R. L. Frantz
Production Department Head
P.O. Box 471
Texas City, Texas 77590

Dear Mr. Frantz:

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
Market Manager
Occupational Health & Safety
Products Department

WPH:1

Attachment

MINNESOTA MINING AND MANUFACTURING COMPANY

UCC 092000

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.

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).

UCC 092002

<u>SALES REPRESENTATIVE</u>	<u>BRANCH</u>	<u>PHONE</u>
Jay C. Hickel	Atlanta	(404) 449-6666
James H. Morgan	Atlanta	(404) 449-6666
Roger M. Schmidt	Boston	(617) 449-0300
Paul E. Bryant	Chicago	(312) 496-6500
Gary A. Huffman	Cincinnati	(513) 242-2313
Richard J. Woods	Cleveland	(216) 267-1800
Paul G. Rogerson	Dallas	(214) 327-7311
Charles D. Hough	Detroit	(313) 477-5000
Lou G. Zeller	High Point	(919) 886-7181
Douglas F. Alley	Los Angeles	(213) 726-1511
Leila M. Frogh	Los Angeles	(213) 726-1511
Douglas D. Swenson	Milwaukee	(414) 276-7377
William B. MacIndoe	Philadelphia	(215) 742-0200
Jack N. Monarek	Philadelphia	(215) 742-0200
Russell J. Loomis	St. Louis	(314) 991-1320
Carl W. Rogan	San Francisco	(415) 589-2663
Karl L. Moll	Seattle	(206) 224-7200
Jerry H. Brennan	Twin Cities	(612) 733-3300
Trent A. Niemeyer	West Caldwell	(201) 227-9100

CC: WAM
RUF

PMF: Vinyl Chloride Monomer Hazard
PLANT MGRS. FILES VC-

Copied for: JSK
NPN
ORR
ASP ✓
RVM
RR
REC
DDR
HAN
DMC
Dr. DHD
JBL

BX0022 SC0028 5000 02/23/77 1042/1045

TO WHOM IT MAY CONCERN M. Egan

THE FOLLOWING STATEMENT IS BEING RELEASED TO THE NEWS MEDIA AT
10:00 A.M. 2-23-77 BY THE SOUTH CHARLESTON PLANT:

WE HAVE JUST RECEIVED A REPORT THAT AUTOPSY STUDIES FOLLOWING THE DEATH
EARLIER THIS YEAR OF A RETIRED FORMER EMPLOYEE OF THE UNION CARBIDE
SOUTH CHARLESTON PLANT, ATTRIBUTE CAUSE OF DEATH TO ANGIOSARCOMA, A
RARE FORM OF LIVER CANCER BELIEVED TO BE LINKED WITH LONG-TERM
EXPOSURE TO VINYL CHLORIDE. THE RETIREE WAS 67 YEARS OF AGE AT THE
TIME OF DEATH. HE HAD WORKED 28 YEARS AT THE SOUTH CHARLESTON PLANT-
22 OF THESE AS A VINYL CHLORIDE WORKER.

THREE EARLIER ANGIOSARCOMA DEATHS HAVE BEEN DISCOVERED SINCE 1968.
ALL THREE EMPLOYEES HAD LONG-TERM EXPOSURES TO VINYL CHLORIDE AT THE
SOUTH CHARLESTON PLANT.

SINCE THE DISCOVERY IN THE EARLY 1970'S THAT EXPOSURE TO VINYL
CHLORIDE MIGHT HAVE AN ADVERSE EFFECT ON HEALTH, UNION CARBIDE HAS
ACHIEVED SIGNIFICANT REDUCTIONS OF EMISSIONS OF THIS CHEMICAL TO
THE AIR AND THE WORK ENVIRONMENT, AND IS COMPLYING WITH OCCUPATIONAL
SAFETY AND HEALTH AND ENVIRONMENTAL PROTECTION AGENCY REGULATIONS
COVERING VINYL CHLORIDE. IN ADDITION, UNION CARBIDE CONTINUES TO
CONDUCT PRIVATE STUDIES ON THE EFFECTS OF VINYL CHLORIDE EXPOSURE ON
HEALTH, AND IS ALSO PARTICIPATING IN SIMILAR STUDIES CONDUCTED BY
THE MANUFACTURING CHEMISTS ASSOCIATION.

C. A. KEIL
CHEMS SC

UCC 092004