



THE CHLORINE INSTITUTE, INC. 342 MADISON AVE., NEW YORK, N.Y. 10017

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Malvin E. Clark, President
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September 21, 1978

Mr. Thomas E. Levenhagen
Area Director, OSHA
U.S. Department of Labor
Federal Office Building, Room 634
200 North High Street
Columbus, OH 43215

*Re: Chlorine Leak/Mead Corp.
and Subcontractors*

Dear Mr. Levenhagen:

We appreciate the materials on the subject file which you have sent to us, most recently on September 5th.

As you know, the mission of our Institute is to promote safety in the manufacture, transfer, packaging and use of chlorine. While our membership does not encompass chlorine consumers such as the Mead Corporation (excluding producers whose output is for captive use), our services extend to anyone in service concerned with chlorine safety. It is, therefore, essential that our posture in such matters truly reflects an industry consensus, as well as that our understanding of statutes and regulations derived therefrom be correct.

We have read the contents of M 4463-513 and the associated notice of contest as related to 29CFR1926.103(a) [Regulations for Construction]. Our interpretation of Table 4, anent contaminants immediately dangerous to life or health, is that it provides for mouthpiece respirators as a viable personal protection means for escape purposes. We do not interpret that in such circumstances provision for full facepiece respirators is mandated. In fact, it is the universal position of the chlorine industry, based on long years of experience and evaluation, that the mouthpiece respirator is vastly superior to the full facepiece respirator in affording effective and immediate protection in the event of an emission during the course of normal work operations. Our reasons include:

- * Facial features, in addition to hair and spectacles, make an adequately tight fit of facepiece respirators essentially impossible.
- * Donning time for full facepiece respirators, particularly for the untrained and inexperienced, is too long for workers exposed to high chlorine concentrations;

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PLAINTIFF'S EXHIBIT

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