



Shell Oil Company • Shell Chemical Company
Interoffice Memorandum

PLAINTIFF'S EXHIBIT

SH-2729

MAY 29, 1987

FROM: A. F. SCHMIT, STAFF INDUSTRIAL HYGIENIST, HEALTH & SAFETY
DEER PARK MANUFACTURING COMPLEX

TO: R. SNODGRASS, MAINTENANCE CENTRAL
DEER PARK MANUFACTURING COMPLEX

SUBJECT: RESPIRATOR REQUIREMENTS DURING ABRASIVE BLASTING AND
CLEANING OF LEAD/CHROMATE COATINGS

In response to your request for clarification of the respirator requirements for abrasive blasting on lead and chromate surfaces, the following information is provided. The current DPMC guidelines require the use of high efficiency particulate air (HEPA) filter respirators. This requirement is based upon the OSHA lead standard, 29 CFR 1910.1025, which requires HEPA filter respirators for personnel exposed to lead dust or fumes above the PEL (0.05 mg/m³). Recent communications with 3M Company revealed that an administrative stay of the requirement for HEPA filter respirators was issued in January, 1979. This stay is still in effect. Therefore, the current DPMC guidelines can be changed to allow the use of NIOSH-approved respirators for dusts, fumes, and mists, such as the 3M 9920.

Industrial Hygiene will review the current DPMC guidelines, and make any appropriate changes. In the interim, the use of the 3M 9920 will meet the OSHA requirements for protection from lead or chromate. We are currently making a determination whether the 3M 9900, which the DuPont contractors are using, meets the OSHA requirements. I will send additional information including a copy of the 1979 OSHA administrative stay when our review is completed.

A. F. Schmit

cc: J. E. Barton
J. M. Bush
P. A. Masta
T. A. Roberts
B. T. Waggoner
AFS Chron
ECB Satellite

LAM 004103

CHBT8715201

DPMC-10190



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Interoffice Memorandum

May 28, 1987

FROM: R. SNODGRASS

TO: J. E. BARTON

SUBJECT: RESPIRATOR REQUIREMENTS DURING ABRASIVE BLASTING AND
CLEANING OF Pb/Cr COATINGS

ENVIRONMENTAL/IND. HYGIENE	
DATE	NAME
5-29-87	J. E. Barton
	Return Document to F
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	Copy: A.F. SCHMIT
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Due to an apparent misunderstanding of what constitutes a "high efficiency air-purifying respirator" as stated as a requirement for auxiliary personnel in the April 30, 1984 letter from Phil Snyder, Maintenance has been using the 3M-9920 dust mask recommended by the Respirator Center.

In order to avoid misunderstanding and to fully comply with requirements, will you please define in writing the type of cartridge respirator required to be worn by auxiliary personnel inside the barricaded areas during blasting operations and the cleanup of the spent abrasive and coating particles.


Ray Snodgrass

RS/lf

cc: J. M. Bush
P. A. Masta
T. A. Roberts
A. F. Schmit
Central Maintenance File

LAM 004104