vallen

PLAINTIFF'S EXHIBIT

KRC-519

February 17, 1984

Southwestern Refining
Box 9217
Corpus Christi, TX 78408

Attn: Waylon Litton

Dear Mr.Litton:

As you know, Vallen Safety Supply brought in two experts to try to resolve the citation you recently received from OSHA on your Standard Safety equipment accordian suit.

Mr. M. H. "Cotton" Harrell and Mr. Bob Trevelier are both recognized as experts in their field by safety equipment distributors across the nation.

OSHA's request to put Egress bottles on the Sta Safe accordian suits can be done; however, as I have explained, you will lose the N.I.O.S.H. approval on your Scott 900055-13 Ska-Paks. I feel this will be true with any manufacture's Egress units. Any breathing air units, including 30 minute or 60 minute air paks, normally have to be altered to be used in these type suits. We feel that the Sta-Safe suit will be functional with a Scott 900055-13 Ska-Pak and the alternations will be the state of the art.. Scott (Cotton Harrell) and Sta-Safe (Bob Trevelier) both agree that this is about the only way to go. However, the N.I.O.S.H. approval will be voided.

You recently mentioned two suits that are shown in the 1984-85 Vallen Catalog as possible being approved. This was the Sta-Safe accordian suit #5196 on Page I. 38. This suit normally uses the Scott 900014-00 30 minute pak. In order to use the air pak, an extended nipple pass-thru is used for the exhalation valve assembly and hose assembly coupling. This extended nipple or pass-thru has not been taken through N.I.O.S.H. for approval. Therefore, this unit has been altered and the N.I.O.S.H. approval is voided. (See enclosure #1).

The Andover Suit shown on Page I.41, Model #1500APB, shows a suit utilizing the Scott 2.2 for the Scott 4.5 air pak. This equipment is worn outside the suit. Andover claims there is no modification to the respirator or air pak; however, Scott does not recommend this equipment being worn outside the suit in Hydroflouric Acid (HF) areas. HF works on the "Head Net" which is responsible for the seal of the face piece. HF acid also works on the harness and the aluminium pressure, reducing block assembly, both of which are vital parts of this equipment. Scott does not recommend any of their equipment being worn where it is exposed to HF acid. I have a letter on the way from Scott backing this statement.

Another thing that you need to consider, is the fact that a 30 minute air pak on a 1-hour air pak, is not considered a work unit. These units are designed for Egress, Rescue, and small maintenance jobs such as closing a valve in a toxic area, etc. This is clearly stated in Los Alamos Manual #LA-6671-M on Page 68. I have attached a copy. (See enclosure 2). The limited duration of a 30 minute air pak is also stated in the "Operating and Maintenance Instructions" provided by Scott.

Since most work in the alkalation unit which requires an air-fed accordian suit takes longer than twenty minutes, I feel that the duration of air must be considered. It normally takes three to five minutes to don an accordian suit with the help of another person. Some of this time the employee must be on breathing air. The employee must then walk into the contaminated area, perform whatever job has to be done, and then proceed to a shower and throughly wash-off the possible HF acid residue before he can be helped out of the suit by another employee. Will an air pak give this employee air for that length of time?

The Standard Safety accordian suit is an outstanding suit for the HF area since the high-grade PVC coating withstands HF acid attack. The accordian design in the arm area and knee area allows the suit to fit most size individuals. The seal-tight sleeves and zippers are often added protection.

As you know, N.I.O.S.H. has not approved any air-fed suits by any manufacturer. Your great grandchildren may never see an approval by N.I.O.S.H. at the rate they are going.

I have tried to outline the various routes you may want to pursue. In my estimation, you cannot offer the following unless you void the N.I.O.S.H. approval on the breathing air units and go with the state of the art.

1. A functional suit that will protect the employee from HF acid burns
2. Adequate breathing air for extended periods of time
3. Protection to fellow employees that will be helping employee out of suit
4. Meet manufacturers recommendations on both breathing air units and suit requirements
5. A safe entry and exit from a contaminated area

If I can be of further assistance, please advise. Vallen will work with you in any way we can to offer your employees the very best in safety.

Sincerely,

Jim Benkendorfer

Jim Benkendorfer
Territory Sales Manager

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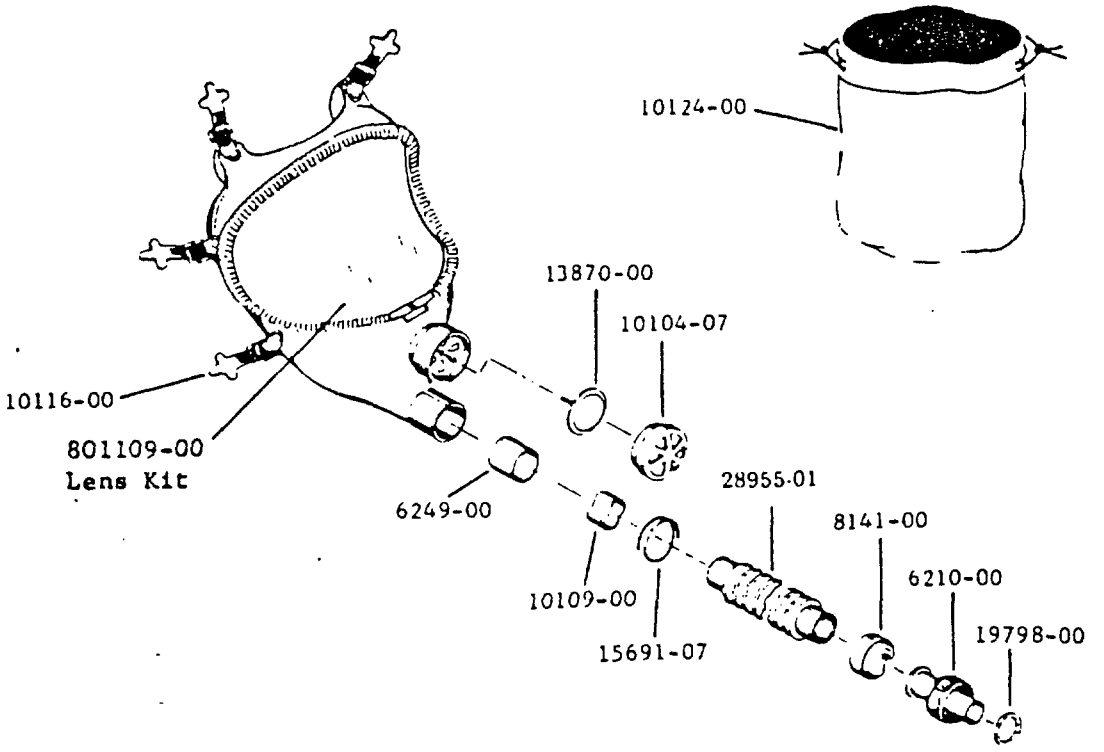
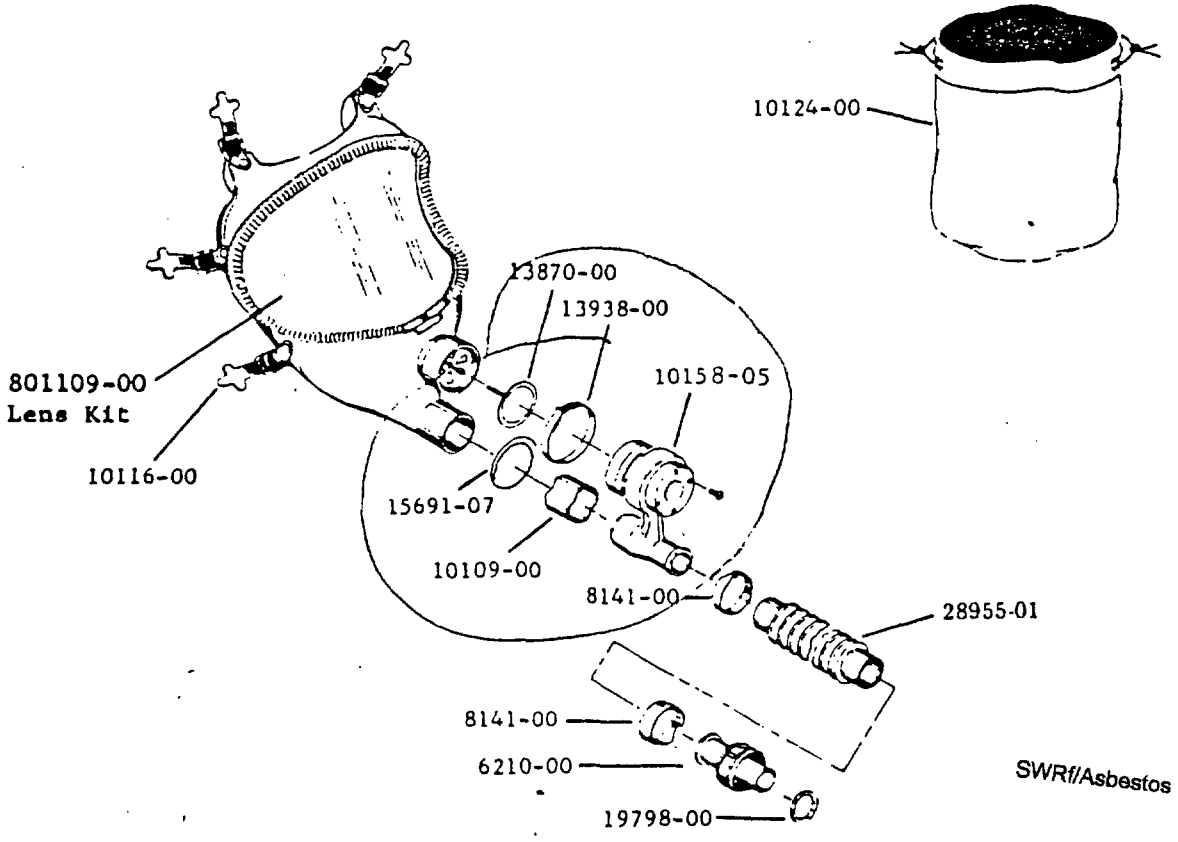
Enclosures

cc; Mr. Waylon Litton
Southwestern Refining

SCOTTORAMIC MASK ASSY. (SPARE PARTS ONLY)



SCOTTORAMIC PRESS/DEM MASK ASSY. (SPARE PARTS ONLY)

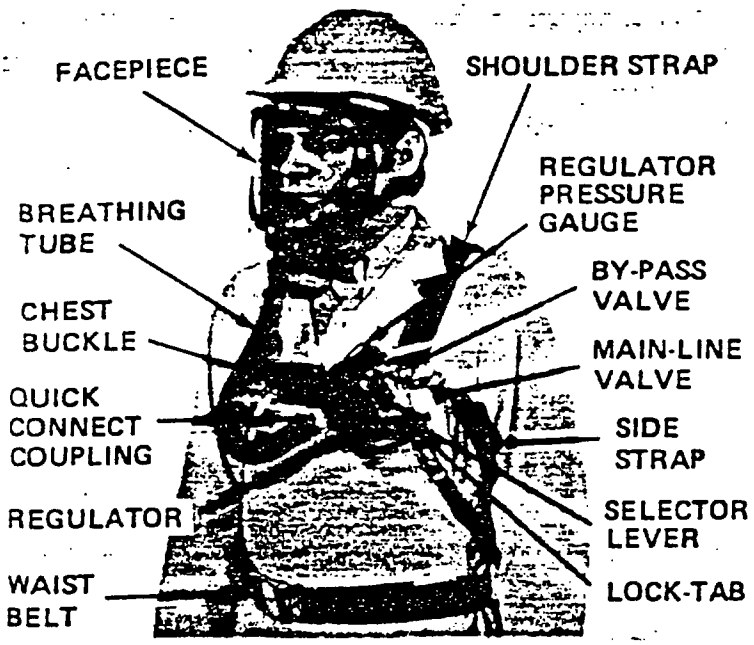


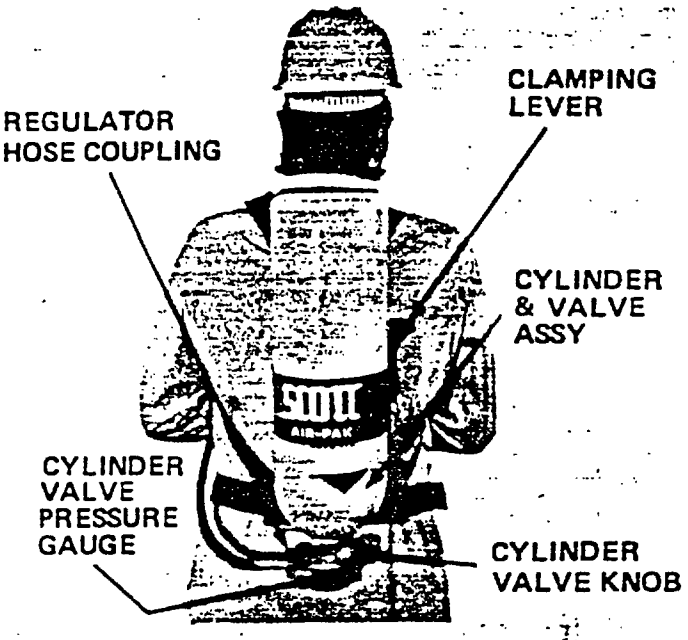
SWRf/Asbestos 6579

SCOTT HEALTH/SAFETY PRODUCTS

SCOTT PRESUR-PAK® IIa PRESSURE-DEMAND 900014 SERIES (30 minute duration)

OPERATING AND MAINTENANCE INSTRUCTIONS





WARNING

IMPROPER USE OF THIS APPARATUS IN A HAZARDOUS ATMOSPHERE MAY RESULT IN INJURY OR DEATH. PERSONNEL SHOULD RECEIVE ADEQUATE TRAINING PRIOR TO USE.

The Scott Presur-Pak IIa, positive pressure, self-contained breathing apparatus (SCBA) is designed to provide maximum respiratory protection in objectionable or toxic atmospheres, regardless of concentration(*), or oxygen deficiency, with a NIOSH/MSHA rated duration of 30 minutes when properly DONNED, USED, AND MAINTAINED BY TRAINED PERSONNEL. The regulator is equipped with an audible Pak-Alarm® which will warn the user of diminishing air supply. The Pak-Alarm will activate when approximately 20-25% of the air supply remains. YOU MUST EGRESS IMMEDIATELY TO THE NEAREST SAFE, RESPIRABLE AREA WHEN THE PAK-ALARM RINGS. The apparatus is certified by NIOSH/MSHA for use in temperatures to -25°F with the installation of a Scott Nosecup Assembly, P/N 801432-00, in the facepiece. The nosecup assembly is required for use in temperatures at or below freezing or whenever fogging may occur.

*WARNING

IN ADDITION TO THIS APPARATUS, ADDITIONAL PROTECTIVE CLOTHING AND/OR SPECIAL EQUIPMENT SHALL BE PROVIDED, AS REQUIRED, FOR COMPLETE PROTECTION TO THE USER AND APPARATUS. (CERTAIN GASES POISON THROUGH THE UNBROKEN SKIN, SUCH AS HYDROGEN CYANIDE, OR ARE EXTREMELY IRRITATING TO THE SKIN, SUCH AS AMMONIA.) EVERY APPLICATION SHALL BE THOROUGHLY EVALUATED BY QUALIFIED PERSONNEL PRIOR TO ENTRY OR USE OF THE APPARATUS.

SERVICE LIFE (Duration of air)

This apparatus is certified by NIOSH/MSHA to provide a "30 minute" duration of air, based on actual machine testing simulating men performing a variety of moderate-to-heavy work tasks.

The user should not expect to obtain exactly 30 minutes duration from this apparatus during each use. The work being performed may be more or less strenuous than the work-rates used in the NIOSH/MSHA tests. The duration may be shorter, possibly as short as 15 minutes, where the individual's work is more strenuous than the NIOSH/MSHA tests.

The duration of the apparatus will depend on such factors as:

1. the degree of physical activity of the user;
2. the physical condition of the user;
3. the degree of training or experience which the user has had with this or similar equipment;
4. the degree to which the user's breathing is affected by excitement, fear, or other emotional factors;
5. whether or not the cylinder is fully charged at the start of the work period;
6. the possible presence, in the compressed air, of carbon dioxide concentrations greater than .04% normally found in atmospheric air;
7. the condition of the apparatus;
8. the atmospheric pressure; Example: when used in a pressurized tunnel or caisson at 2 atmospheres (15 psi gauge) the rated duration will be one-half as long (15 minutes) as when used at 1 atmosphere; and at 3 atmospheres will be one-third as long (10 minutes).

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the continuous-flow or pressure-demand mode provides much better protection than one that operates in the demand mode.

A great advantage of the air line respirator is that it can be used for long continuous periods. Other advantages are minimal breathing resistance and discomfort, light weight, low bulk, moderate initial cost, and relatively low operating cost.

Advantages and Limitations of Hose Mask Type Supplied-Air Respirators

Obviously, air pressure inside the respiratory-inlet covering of the hose mask with no blower is negative during inhalation, so contaminated air can leak in if the covering fits poorly. At present, 30 CFR Part 11 allows a hose mask with a blower that supplies respirable air at a relatively low (50-lpm) flow rate to be approved for atmospheres immediately dangerous to life and health. Hose mask type supplied-air respirators, with and without blower, are not recommended in atmospheres immediately dangerous to life or health.

The trailing air supply hose of the hose mask also severely limits mobility, so it may be unsuitable for those who must move frequently among widely separated work stations.

A severe restriction of the hose mask without blower is that it is limited to a maximum hose length of only 75 ft. Also, it requires the wearer to inhale against the resistance to air flow offered by the air hose which may become significant during heavy work. Inhaling against this resistance strains the wearer and may cause fatigue.

Advantages of the hose mask without blower are its theoretically long use periods and its simple construction, low bulk, easy maintenance, low initial cost, and minimal operating cost. An advantage of the hose mask with blower is its minimal resistance to breathing.

Advantages and Limitations of Self-Contained Breathing Apparatus

The bulk and weight of most SCBAs make them unsuitable for strenuous work or use in a very confined space. The limited service life makes them unsuitable for routine use for long continuous periods. The especially short service life of open-circuit type devices may limit them to use where the wearer can go conveniently and quickly from a hazardous atmosphere to a safe atmosphere to change the tank of supply air.

The demand type open-circuit SCBA and most closed-circuit SCBAs have negative air pressure inside the respiratory-inlet covering during inhalation, so contaminated air can leak in if they fit poorly. The pressure-demand type open-circuit SCBA and those closed-circuit SCBAs that are positive-pressure devices provide very good protection because the air inside the respiratory-inlet covering is always at positive pressure which keeps the contaminated atmosphere from leaking in.

Because the SCBA wearer carries his own supply of respirable air, he is independent of the surrounding atmosphere. A great advantage of such apparatus is that it allows comparatively free movement over an unlimited area.

RESPIRATOR USE UNDER SPECIAL CONDITIONS

In Dangerous Atmospheres

Written procedures shall be prepared for safe respirator use in dangerous atmospheres that may occur in normal operations or emergencies. Personnel shall be familiar with these procedures and respirators. At least one standby man, equipped with proper rescue equipment including a SCBA shall be present in the nearest safe area for emergency rescue of those wearing respirators in a dangerous atmosphere. Communications (visual, voice, signal line, telephone, radio, or other suitable type) shall be maintained among all persons present (those in the dangerous atmosphere and the standby man or men). The respirator wearers shall be equipped with safety harnesses and safety lines to permit their removal from the dangerous atmosphere if they are overcome.

In Confined Spaces

Confined spaces are enclosures that are difficult to get out of, such as storage tanks, tank cars, boilers, sewers, tunnels, pipelines, pits, and tubs.

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Vallen

JW

April 2, 1984

Mr. Waylon Litton
Safety
Southwestern Refining
P O Box 9217
Corpus Christi, Texas 78408

Dear Waylon:

Dave Taylor, Vice President of Vallen in Houston, Texas, checked out the rumor that Andover was owned by MSA.

Dave talked with the President of Andover, Mr. Kevin Crowley, and Mr. Crowley assured Dave that MSA did not own any portion of Andover. The only connection between the two companies is that Andover does make chemical suits for MSA.

This means that the suit itself has no N.I.O.S.H. approval. The breathing air units that would be purchased separately have approvals, and if they are not altered the approvals will remain in force. I am not qualified to say if the Breathing Air Units are altered.

Waylon, I am sorry for the delay in getting this information to you, but Dave was out of town, tied up with TSA, etc.

We appreciate your business.

Sincerely,

Jim Benkendorfer

Jim Benkendorfer
Sales Representative

JB/ck

cc: Dave Taylor