

RECD. MAR 11 1977 FSP



INTERNAL CORRESPONDENCE

US AND PLASTICS

① Mr. R. L. Frantz

TEXAS CITY PLANT

② JBL

Mr. D. E. Deese  
Mr. M. E. Eisenhour  
Mr. W. A. Mazzolini  
③ Mr. F. S. Provenzano  
Mr. R. J. Taylor  
Mr. R. N. Wheeler - 514

Deese says no  
TAYLOR says maybe, but, etc  
Whittlesey says OK Legally  
FSP - Says no unless you can convince  
me it won't be impossible to  
administer its use.

SUBJECT 3M Brand Vinyl Chloride  
Respirator No. 8716

Ref: Letters on Subject:

- (1) D. E. Deese dated Feb. 17, 1977 (attached)
- (2) R. J. Taylor dated Feb. 22, 1977 (attached)
- (3) J. W. Whittlesey dated Feb. 28, 1977 (attached)

In answer to your inquiry of February 10, 1977, I would summarize as follows:

Subject mask could be used if its use can be properly controlled to less than 10 ppm concentrations of Vinyl Chloride, and a record keeping system can be maintained to insure ourselves as well as OSHA, that the masks are being used only within the specified design limits. The de minimus citation would pose no legal problem according to Mr. Whittlesey. However, I would strongly suggest management U/A on this question.

Please refer to specific comments/concerns of Messrs. Deese, Taylor, and Whittlesey, attached. If you have additional questions please contact me.

J. B. Leverton

JBL:ir  
Attachments

UCC 094682

MEMORANDUM

To: Mr. J. B. Leverton

Date: February 17, 1977

From: D. E. Deese

Subject: Letter from R. L. Frantz dated February 10, 1977

Dear John:

The initial selection of respirators for VCM regulated areas was based on the following criteria:

- 1) Shall be selected from those jointly approved by MESA-NIOSH.
- 2) Shall be selected per Schedule 1910.1017 (g)(4).
- 3) Shall offer maximum protection for the respective categories of respiratory types -- namely, (1) self-contained emergency equipment, (2) Type C supplied air respirator, and (3) Air-purifying canister or cartridge type.

Additionally, 1910.1017 (g)(6) further requires where air-purifying respirators are used:

- 1) Replacement prior to the expiration of their service life or the end of the shift in which they were first used, whichever occurs first, and
- 2) Use of a continuous monitoring and alarm system "to alert employees when VCM concentrations exceed the allowable concentrations for the devices in use."

Considering the above, the respirators selected were: (1) M-S-A Self-contained Breathing Apparatus, pressure demand type, with full facepiece ..... good for unknown concentrations or above 3600 ppm; (2) M-S-A combination Type C Supplied Air Respirator, pressure demand type, with full facepiece and auxiliary air supply.... good for not over 3600 ppm; and (3) M-S-A Gas Mask, 4-hour canister .... good for not over 25 ppm.

The latter is the one in question.

UCC 094683

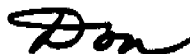
We do not recommend use of the 3-M Respirator No. 8716 until the following are realized:

- 1) MESA-NIOSH approval.
- 2) Fewer incidents of VCM concentrations above 10 ppm occur.
- 3) An alarm system at 10 ppm exists.

Our observations and calculations indicate the need to upgrade the type respirator used -- not downgrade. We cannot abandon quality protection solely to comfort and convenience.

These same basic criteria were expressed by letter dated April 21, 1976 on the subject of half- facepiece respirators.

Your comments are welcome.



D. E. Deese  
Industrial Hygiene Director

ec

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J.B. Leverton

INTERNAL CORRESPONDENCE

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SAFETY DEPT.

COMMODITIES AND PLASTICS

P. O. BOX 470, TEXAS CITY, TEXAS 75685

Mr. R. J. Taylor  
Mr. J. W. Whittlesey - 501  
(46)

DATE February 17, 1977

SUBJECT 3M Brand Vinyl Chloride  
Respirator No. 8716

Ref. (1) Letter of R. L. Frantz  
to J. B. Leverton re. 3M Brand  
Vinyl Chloride Respirator No. 8716  
dated February 10, 1977 (attached)

Ref. (2) Letter of W. P. Harris of  
3M Company to R. L. Frantz  
dated January 19, 1977 (attached)

Gentlemen:

This is to request your input and guidance regarding the use of subject  
respirator in VCM exposure situations.

Specifically:

- (1) Do you recommend use of the mask in our vinyls departments  
at this time?
- (2) What would our legal liability be considering possible "de minimus  
citations"?

Any comments you may have would be most appreciated. Please contact  
me if you have any questions.

JBL

Apparently O.K. if control can be  
maintained e.g.  $\leq 10\text{ppm}$ , records  
on which employee wears + amt. of  
time each respirator is worn.  
Looks as tho each respirator ~~exists~~  
be numbered assigned, and record  
JBL:ir maintained.

Attachments

Cost vs. service?

Thanks,

John B. Leverton

I don't know but ~~not~~ I have a concern whether they will  
be used properly and whether we're willing to accept  
citations - de minimus or not. RLT

UCC 094685