

FROM THOMAS B. BONNEY
PITTSBURGH OFFICE

TO MR. E. B. PARKER
ROCKDALE WORKS

April 12, 1973

RE: RESPIRATOR PROGRAM

In view of my hurried conversation with Mr. Mueller during my recent visit to Rockdale, I thought it might be wise to record my few comments to make certain I covered them all. Your respirator program looks to be good and well thought out. My only general comment is that, you should, if you have not already done so, carefully read through Section 1910.134 of the OSHA Regulations to make certain you have not missed any of the requirements. Unfortunately, today we are almost as concerned about compliance as we are about assuring safety.

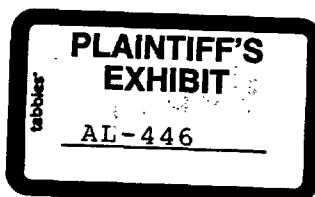
I strongly urge that you consider phasing out the industrial gas mask and substituting the self-contained breathing apparatus (e.g., Scott Air Pak) for it. When a man gets into trouble he will grab the first protector available. He has no way of knowing if carbon monoxide is present or if there is less than 15% oxygen or if the contaminant is in excess of 2%. On the other hand, if he grabs the self-contained breathing apparatus, he doesn't have to know these things since it can be used in any situation requiring respiratory protection.

One comment about the sanitizing procedure. I'm not familiar with Septisol, but I know that, in the case of many other sanitizing agents, small residues left on the respirator can cause dermatitis. Unless the supplier indicates otherwise, it would be well to impress on your employees the need for them to rinse the facepiece well with water after sanitizing.

It is important that all respirators are checked within a certain minimum time. Experience will probably best determine what this interval should be (I'm assuming that the foremen who are to check the condition of respirators will receive some training on what to look for). Another point pertaining to maintenance: the employees should understand that you encourage them to bring malfunctioning equipment to their foremen for repair or replacement.

The proper replacement interval for cartridges and filters may be worth some additional thought. The man exposed to dust normally will quickly look for a replacement filter when it gets too hard to breathe. However, some will just discontinue wearing the mask. These are the people we have to help since they don't seem to want to help themselves. Eventually based on your experience, I believe you will have to set up a regular schedule for replacing filters and cartridges.

One final point refers to your nuisance dust respirator (3M-8500). Since OSHA requires that we use only approved respirators, these respirators can be used only for purposes of comfort. If it is



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