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NOVEMBER 3, 1978

TO : PLANT SAFETY COMMITTEE; PACKAGING COMMITTEE; AND  
PSC RESPIRATORY EQUIPMENT TASK FORCE

FROM : JAMES H. DOYLE

SUBJECT: OSHA CITATION RE. RESPIRATORY PROTECTION VIOLATIONS

PLAINTIFF'S EXHIBIT

MON-2564

The ATTACHED two examples of recent OSHA citations issued as information items that are cause for concern to producers, packagers, and consumers of chlorine.

The Head Incident was particularly surprising in that it would appear that the regional OSHA office is establishing a precedent in the decision that full-facepiece respirators are the minimum acceptable protection for chlorine releases. The Institute reacted to the citation as noted in the ATTACHED correspondence. Whether the protests registered will prove effective in obtaining a concession by the regional OSHA office remains to be seen.

The other citation further illustrates the strict application of OSHA regulations once an incident occurs. Deficiencies in chlorine detectors, written standards for respirator use and inspection, and chlorine exhaust and scrubbing systems are items which would cause problems for many chlorine handling facilities.

A recommended reference to members needing to become more familiar with OSHA inspectors' evaluation method is Program Directive #300-9. For the cost of reproduction, copies of this directive, which covers the OSHA Standard Method for determination of respiratory protective program acceptability, can be obtained from the Institute offices. This document is issued to OSHA field personnel as a guide in administering the respiratory regulations contained in 29 CFR 1910.134.

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enclosures

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