

MINNESOTA MINING & MFG. CO.

FIELD LETTER OF C. A. Thorpe

CITY Washington, D.C.

DATE 1-19-72

TO J. E. Corbin

CC:
✓ R. J. Barghini
J. E. Barnard

SUBJECT: #8500

A.M. MEETING AT DEPARTMENT OF LABOR, 400 1ST STREET NW

Bob Barghini, Duncan Holaday and I met with Department of Labor OSHA officials in Washington in an attempt to clarify their stand on the #8500. In attendance from OSHA were:

Ray McClure, Chief of the Office of Compliance Evaluation
John O'Neil, Chief of Standards Section
Gene Regad, Mr. O'Neil's Technical Assistant.

The tenor of the meeting found all of us, including O'Neil and Regad lined up against McClure. O'Neil and Regad may have agreed with McClure philosophically, but pointed out that the law requires approved respiratory protection only when there is a health hazard present. Thus, the #8500 can be used anywhere a health hazard doesn't exist and the Compliance officers have no jurisdiction in these cases. At the start of the meeting McClure stated that:

1. The #8500 is more often misused than not. The primary uses he observed in the field are for paint vapors and silica containing dust.
2. If the #8500 is available along side other respirators in a plant, it is impossible, administratively, to limit the #8500 to non-toxic situations.
3. Many dusts not in the TLV list may actually be toxic or be considered toxic by the workers and therefore, approved respirators should be used. (O'Neil pointed out that the law covers only those materials with established TLV's).

We showed all of our #8500 sales literature to Ray. He emphasized that he couldn't tell us what to do, but would like to see paint spray illustrations removed and qualifications put on some other illustrations; e.g. grinding auto - we should indicate that it shouldn't be used when grinding lead filler or lead paint. He was impressed by the Dust Guide and suggested that we revise it in light of new regulations. He would be willing to advise us prior to publication and broadcast it to Compliance officers after publication. He also suggested that format and control be discussed with Jerry Lynch and Bob Kraft at NIOSH.

After considerable discussion, during which time Duncan was extremely helpful, McClure agreed to do all he could to disseminate information to OSHA Compliance officers concerning the #8500.

THIS MARGIN TO BE USED
FOR OFFICE NOTES, ETC.

Form FL-1

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This information will emphasize that the #8500 cannot be thrown out merely because it's there, that Compliance officers must prove that there is a toxic material (health hazard) present, and that the #8500 does have a place in industry.

McClure was shown our #8710 and did not realize that a single use respirator was this close to approval. He was enthused about this eventuality and feels this new respirator will solve many of their field problems. He outlined some of the problems experienced in the field and suggested we visit C. Brown, the Senior Industrial Hygienist in the Atlanta OSHA office. Regional Administrators have substantial autonomy and in Atlanta Mr. Brown, with the backing of his Regional Administrator, has been very hard on the #8500. This could account for the problem at National Airlines in Miami and also the problem in High Point. We should do this as soon as possible before more #8500 users are cited.

The subject of formal approval for nuisance dust respirators was discussed. All felt that this would be a good move, that it is coming, and that it's a long way off.

Generally, this meeting was well worthwhile. We did have to make some concessions as regards our literature, but I feel as a result these three people are on our side or at least willing to call a spade a spade. We will have to establish contact and rapport with the regional offices but this was a good start. Duncan Holaday once again was worth his weight in gold. He is accepted as an expert.

P.M. MEETING WITH RAY HAAS, INSULATION WORKERS, 1300 CONNECTICUT

Met with Ray Haas, General Secretary-Treasurer, International Association of Heat and Frost Insulators and Asbestos Workers. Ray had seen our #8710 previously and this was merely a courtesy call to establish contact. There is a great deal of interest in the #8710 in this office. Ray said he talked with Dr. Nichol who advised that there would be information in the next "Green Sheet" on four single use respirators; 3M, A0, Welsh and one other he couldn't remember. Ray offered to provide us with a list of the locals and a list of contractors for any information we want to disseminate. This was a good P.R. call and we should maintain contact with these people.

(Signature)
CAT:jw

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