

RECEIVED

OCT 11 1974

SAFETY AND
PLANT PROTECTION

October 4, 1974

Mr. A. de Jean King, Sr.
U.S. Department of Labor
Occupational Safety & Health Administration
2720 Riverside Drive
Macon, Georgia 31204

Reference: CSHO No. C-0637 OSHA-1 No. 56
Fy-74 dated April 3, 1974
Progress Report

Dear Mr. King:

You will find listed below a progress report on alleged violations of the above citation and a request for an extension of the long-range abatement of Item #3 29CFR 1910.95.

Item No. 1 - Standard 29CFR 1910.93 (a)

The respiratory protection requirements for all personnel working in the Opening-Blending and Carding areas are still in force.

Respirators were removed from personnel in the Weaving area last month. Studies indicate that dust concentration levels are remaining below the standard.

A. Opening and Blending

1. The efficiency test for filtration of our Wheelabrator system was conducted by engineers from Air Quality Testing and Design, Inc. Each of the three baghouses was given a one hour test in which the air sampled was isokinetically extracted from the ductwork. The asbestos fibers were collected on a membrane filter and transported to a laboratory for analysis at 450X magnification (4 millimeter objective) phase contrast illumination. The asbestos concentration of fibers/ml were as follows: north baghouse 0.30, east baghouse 0.23, and the west baghouse 0.43.
2. A vacuum asbestos distribution system is being studied which consists of metal hoppers below the existing condenser to handle the surges which occur in the present blending operation.

Multiple mixes considerably complicate any proposed system. Manual valves and card hopper redesign to accept the stock is thought to be the answer.

000473

October 4, 1974

Connection of the duct system to the Wheelabrator network to eliminate dust is to be engineered into the system. Preliminary drawings are completed at this time. Engineering and economic feasibility studies should be completed by the next reporting date.

B. Carding

1. The trial of the exhaust and fly removal beneath the cards has been improved and now is working better. Plans are underway to extend this idea to both the breaker and finisher cards. This will take a few months to complete due to the close quarters and available personnel with know-how to do the job.
2. The ductwork to exhaust the grinder has been completed. It took the contractor much longer to fabricate this than was expected; however, it is performing better than anticipated. This hood and exhaust was installed at a cost of \$2,435.95, not including engineering which is now a fixed cost.

The other grinder will be hooded by the same method or not used. Economics does play an important part in how fast we are able to move, but engineering and fabrication are also time consuming. We are trying to improve in several areas at the same time.

C. Weaving

1. The automatic warp-wetting system has been designed and is performing satisfactorily. This is to be tried for another week; and if no bugs develop, it will be extended to all the looms.
2. Dr. NiFong was contacted and an employee was sent to the Airbourne Dust Sampling and Counting Training Course in Cincinnati, Ohio. It was found that our present system was identical, except for a recent change of counting up to a hundred fibers or a hundred fields instead of a hundred fibers or 20 fields, whichever came first.

Item No. 2 - Alleged failure to utilize feasible administrative or engineering controls as specified under Standard 29 CFR 1910.93 for concentrations of raw cotton dust exceeding table 6-1.

A. Garnett Machine

1. Reworkable waste is being processed through the opening system and the idea of a new garnett machine has been scrapped for the present time. We feel we have less dust without garnetting and quality is still good.

0002450

October 4, 1974

B. Carding Area

1. Twelve new "dog-legs" attachment ducts to cards have replaced old ductwork.
2. The Cahn Electrobalance, which cost over \$2,000 and never worked, has finally returned from California. We are beginning to sample cotton dust concentration and should have results by the next report.
3. The chute feeding system has been discussed with two contractors, but designs for a workable system with bids have not been received yet.
4. The major reduction in cotton dust has been obtained by a reduction in the amount of cotton being processed. We are attempting to go out of cotton into 100% synthetic. However, the supply and market may make this non-feasible.

Item No. 3 - Alleged violation of Standard CFR 1910.95 on Noise exposure.

This is probably the most difficult and complex problem we face. We still require hearing protection for all personnel in those areas exceeding the 90 decibel standard.

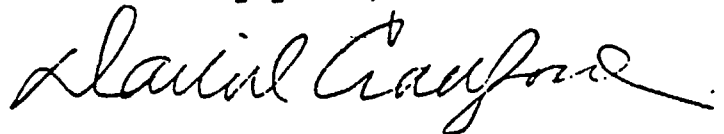
We are making

several checks as we try new procedures. The changes have been insignificant to the overall reduction and barriers seem to redirect more than 50% of the dust. More attention is needed requiring more time and money in the design, delivery of equipment and trial.

D
a
a
we
wi

Duraloc product, it is administratively difficult to rotate personnel. Training time is a large portion of the available market. Therefore, we have set a goal of one year to October 1, 1975, to comply with the standard problem.

Sincerely yours,



W.D. Crawford
Plant Manager

WDC:bt

blcc: Messrs. L.M. Boulware
J.L. Dorrier
R.P. Sprayberry

0000481