

To: Daniel W. Hurley Unit: ICD (Hightstown)
From: William R. Bronner Unit: OGC-Law (New York)
Subject: Draft Documents - OSHA

Attached is the letter for submission. After you have had the opportunity to review it, I would be pleased to discuss any questions you might have.

WRB

WRB:sp
Attachment

c: T. Anderson) w/attach.
F. R. Baser) w/attach.
O. Douglas) w/attach.
J. E. Silver) w/o attach.
R. W. Unwin) w/attach.

N 27286

NL

March 20, 1978

Mr. Walter E. Wilson
Area Director
Occupational Safety & Health
Administration
Suite 4256, Federal Building
600 Arch Street
Philadelphia, Pennsylvania 19106

Citation K9638, No. 63, December 22, 1975

Dear Mr. Wilson:

This will serve as our petition for modification of the abatement period for the above citation. In order to resolve all aspects of the above referenced citation, NL Industries, Inc. respectfully requests a two year extension of the present abatement period for the Philadelphia plant.

The additional time is necessary because circumstances beyond our control have prevented us from fully abating the cited conditions. Despite installation of existing recognized engineering controls in an effort to correct the conditions, certain areas appear to require further attention. Furthermore, because of the inter-relationship and close proximity of some of the cited areas, conditions in some areas may have deleterious effects on conditions in other areas,

NL Industries, Inc./Office of General Counsel
1230 Avenue of the Americas, New York, N.Y. 10020

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despite the absence of any local contributing cause. For certain of this plant's processes, at present no feasible engineering controls appear to be appropriate and which can be applied to the plant's affected processes. NL has therefore embarked on a program to design new technological solutions. The work involved is complex.

We have installed feasible engineering controls wherever practicable. With respect to the plant's efforts to date, since March 1977, we have allocated resources as depicted in the attached table. Considerable time and engineering effort have been expended on our Number 5 Flash Dryer Packer. This packer is to serve as a prototype for our other packing stations. To date, we have redesigned #5 Packer through various stages and now have an engineering model which meets the requirements specified in the Industrial Ventilation Manual (see excerpted pages). We now have a packer which has a uniform 300 linear feet per minute face velocity, which should theoretically control any dust spilled at the packer.

Personal monitoring of the men working at this location has to date yielded sporadic results, due to several factors: a variable density of the product being packed, excessive sifting of the bag itself, and an excessive amount of powder dropping from the packer nozzle removing the bag. To alleviate

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these problems, we have made further modifications in the prototype, are investigating installing an automatic device to purge the nozzle of remaining product, and are experimenting with a "sift-proof" bag and "heat sealing" of the bag spout. Upon completion of the development of this prototype, we plan to adapt it to our other packing stations.

The Proctor-Schwartz Continuous Dryer has developed into an engineering problem. We have had difficulty in maintaining a negative air pressure in the vicinity of the dryer without inhibiting drying efficiency. We recently had a representative from P & S visit our facility in an attempt to gain further insight into the problems associated with the dryer. We have to date spent \$57,300 in an effort to upgrade the system and are presently installing a new mill at a cost of \$64,000 to try to "clean-up" that stage of the operation. Lead-in-air data indicates that the dryer is still operating unsatisfactorily, and it appears that novel technology will have to be developed. We have recently purchased a GCA RDM201 Mass Monitor in an effort to identify the specific problem points.

In addition to our current work in the cited areas, we have or are in the process of improving the following equipment: 45X Packer, Barton Pot Dust Collection; and Compactor Dust Collection.

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Additionally, several engineering concepts are being developed to reduce lead-in-air values. First, a process has been developed which will render part of our production "dustless". The installation of this facility is scheduled for this year at an approximate cost of \$437,000. Secondly, a semi-bulk "air pallet" system is being developed for sales and for the storage of intermediate products used in the plant. Also, our corporate engineering staff is investigating novel packing systems with which to replace our present packers.

In order to ensure that the health of our employees is maintained during the interim period necessary to complete our engineering studies and facilities modification we have the following programs in progress:

- A. Respiratory Protection - Consistent with provisions of 1910.134.
- B. Biological Monitoring - Employee blood lead levels are monitored every six to eight weeks by a certified physician, dependent upon job classification.
- C. Administrative Control - Employee time in "lead" areas is subject to strict limitations based upon the medical evaluation issued by the company physician.
- D. Education - The plant Safety Supervisor evaluates work practices, respirator usage, housekeeping, and personal hygiene throughout the plant and initiates corrective measures when necessary.

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The plant Safety Supervisor's efforts are being effectively complemented by the assistance of the Divisional Industrial Hygiene and Safety Manager.

The above programs are providing full protection.

In conclusion, while we are making considerable progress, we have not achieved abatement in the cited areas. Because of the complexity and magnitude of the problem we respectfully request a two year extension of our abatement date. The two year period requested is critical to the further development, purchase, and installation of engineering controls. In this connection, we would be pleased to review with you our specific timetable needs.

NL INDUSTRIES, INC.
Industrial Chemicals Division

Thomas E. Anderson
Plant Manager

TEA:sp

c: G. Saigo, President
I.A.M.A.W. District #1, Local 2568
Plant Posting

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