P O Box 2027
Tyler, Texas 75710 Tx 214/882-5511

Tyler Pipe
Subsidiary of
Tyler Corporation

MAR 1982
RECEIVED

March 18, 1982

Mr. Skip Guimond
Joseph A. Guimond & Associates, Inc.
80 N. Main Street, Box 230
Sellerville, PA 18960

Dear Skip:

Enclosed is a copy of a proposed letter to Mr. C. R. Holder in regard to our compliance program. Also enclosed is a copy of the North Plant Environmental Program.

I would appreciate it if you could take the time to read the letter and review the program and call and give me your ideas on any changes that might be needed.

Your help is greatly appreciated.

Sincerely,

TYLER PIPE INDUSTRIES, INC.

Charles Kuenemann

Charles Kuenemann
Safety and Security Manager

CK:dlr

Enclosures

Guimond
EXHIBIT NO. 6
WORLDWIDE COURT REPORTERS, INC.

PLAINTIFF'S EXHIBIT
TPI-135

G 00160

March 17, 1982

Mr. C. R. Holder, Area Director
U. S. Department of Labor
Occupational Safety and Health Administration
Room 208, Federal Building
Tyler, TX 75702

Dear Mr. Holder:

After completing the preliminary study of the problem areas, we find ourselves in a position that requires an on going study of all areas of our operation. From the results of these studies, we cannot guarantee with reasonable engineering certainty, that the problem areas can be corrected and brought into compliance with O.S.H.A. regulations.

Our program has included the testing of the entire North Plant as well as the two cited operations. Based on the results of the studies, we have compiled a program which outlines our plan for the entire North Plant. This plan/program identifies certain things we will be doing along with the time schedule for their implementations.

Since this is a centrifugal cast pipe facility, there are no established controls for all the problems that may arise in the area. As a result, it will be necessary to use experimental measures in prototype programs. This approach has long been a sound engineering practice to develope such prototype programs to evaluate and develope effective control methods so that they may be adopted in the best possible ways to the operation of this foundry.

In addition, Tyler Pipe has already installed an extensive dust and fume control system in our effort to provide air contaminant control throughout our facilities. These control measures are being continually reevaluated to insure that they meet the design specifications. The accompaning plot plan outlines the various areas as shown on our schedule. Each area to be controlled has been described briefly and some of the work that will be done in the area to help reduce the air contaminant.

The Slinger Areas: The Slingers are principally a green sand system whereby the sand is slung into a mold around a pattern to form the mold for the pipe to be cast. Work practices in this area will be evaluated to see if any changes can be made that will eliminate the employees exposure to the air contaminants in his area. Furthermore, the operator will be better shielded from spills of sand around the slinger operation. Also we will be looking into the blowing out of the mold just prior to pouring, to see if this can be eliminated or further collected. Dust collectors for each

of the slingers will be checked for efficiency to ensure that they are drawing the proper amount for each location to collect dust as originally designed. Spill contaminants from overhead will be looked into to see what the possibility is to reduce these spills, not only from the overhead sand delivery belts but the rotary feeder to determine if it would be feasible to further seal the rotary feeder to eliminate some of the spills from overhead.

Permanent Mold Pipe Machines: We are in the midst of an on going experiment in processes which hopefully will reduce significantly the percent of free silica that is contained in the mold spray. This mold spray contains "silica flour". While we are experimenting and trying to find a replacement for silica flour or reduce the concentration of it, we will still have to be able to produce an acceptable pipe casting. Our work to date has included the possible use of non-silica sand, Olivine, as a percentage of the over all slurry mix. So far, we have only been able to reduce by 25% the silica flour, and have run into significant difficulties. Never the less, the results are encouraging and we will continue the experimenting with materials to possibly replace Olivine. Reduction of silica content will have a possible overall effect on the entire North Plant.

Further experimental work utilizing nonfoundry materials and additives which may have a potential of reducing the silica concentration is needed. Unlike Olivine, these materials are not in general foundry use and require more extensive testing and laboratory testing.

Ventilation: General ventilation in the whole North Plant is being reevaluated. There have been a number of dust collectors installed in the North Plant, but the testing done has not been conclusive to determine the possibility of increasing cross contamination due to the change of air flows through the plant. As part of our compliance programming, we will be determining the possibilities of cross contamination and an effort will be made to eliminate the cross contaminations and improve over all ventilation of the foundry areas. Further look will be into design of our building structures and the possible use of push-pull ventilation; in other words, to introduce fresh air low and take it out high.

Some of the material that will be sent to you will be of proprietary nature. We would appreciate that you would keep this information proprietary. Some of the areas that will be looked into will be of an experimental nature, that have not been tried in foundry industries

before. Therefore, it is to our advantage to keep the information as confidential as possible. Some of the techniques that may be developed and products that may be used could be revolutionary in improving the environment in the foundry industry.

If you have any further information that you require, please feel free to call.

Sincerely,

TYLER PIPE INDUSTRIES, INC.

Charles Kuenemann
Safety and Security Manager