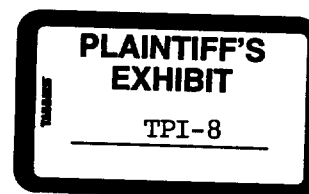




Tyler Pipe

Subsidiary of
Tyler Corporation



October 4, 1982

OSHA Dallas Area Office
Central Place, Suite 230
1425 W. Pioneer Drive
Irving, TX 75061

Attention: Mr. Del Kehbiel

Ref: OSHA Citation #R5407-027

Dear Mr. Kehbiel:

The following information is what you requested pertaining to the range of percent silica in the samples taken in the Hub Core Building, the Fittings Core Machines, and the Muller operations station.

The range of percent silica in the Hub Core building was from 0.513 to 8.696. The time range was 360 minutes to 497 minutes. These were then time weighted out to a 10 hour shift. All samples were within limits with the actual number of minutes run on the sample.

In the fittings core machine area the range on the percent of silica was 0.287 to 3.388. The time span was 475 to 488 minutes. Of the samples taken all except one were in compliance when it was time weighted to a 10 hour shift.

On the Muller operation the two tests were run and the percent silica was 14.894 and 20.684. The time was 417 minutes to 462 minutes. These samples were time weighted to 8 hour sample.

If you need any further information, please do not hesitate to call.

Sincerely,

TYLER PIPE INDUSTRIES, INC.

Charles Kuenemann
Safety and Security Manager

CK:dlr

P.O. Box 2027
Tyler, Texas 75710, Tel: 214/882-5511

Tyler Pipe

Subsidiary of
Tyler Corporation

September 20, 1982

OSHA Dallas Area Office
Central Place, Suite 230
1425 W. Pioneer Drive
Irving, TX 75061

Attention: Mr. Charles Freeman
Area Director

Ref: OSHA Citation #R5407-027

Dear Mr. Freeman:

The following are the average TWA (Time Weighted Average) exposure and the average PEL (Permissible Exposure Limit). All tests taken were below the PEL. The results are listed for the Muller operations, the Fittings Core Machines and the Hub Core Room.

The Muller operator had an average TWA exposure of 0.492 and an average PEL of 0.517. There were two samples taken.

The fitting core machine had an average TWA exposure of 1.869 and an average PEL of 3.439. There were 18 samples taken in the area.

The Hub Core Room had an average TWA exposure of 0.654 and an average PEL of 2.844. There were 59 samples taken in the area.

We feel very confident with these results. The results were averaged to give an overall view of the situation in the area.

If you need any further information, please do not hesitate to let us know.

Sincerely,

TYLER PIPE INDUSTRIES, INC.



Charles Kuenemann
Safety and Security Manager

CK:dlr

TYLER PIPE INDUSTRIES, INC.
Tyler, Texas 75710, Tel: 214/882-5511



Tyler Pipe

Subsidiary of
Tyler Corporation

July 30, 1982

OSHA Dallas Area Office
Central Place, Suite 230
1425 W. Pioneer Drive
Irving, TX 75061

ATT: Mr. Charles Freeman
Acting Area Director

Ref: OSHA Citation #R5407-027

Dear Mr. Freeman:

This letter is to report compliance with the citation referenced above. We are satisfied, with the results of our on-going monitoring program, that we are in compliance. We have taken a number of tests and all are in compliance.

The data collected during the tests is being compiled and correlated. These results should be completed within the next 30 to 60 days and will be sent at that time.

If you have any questions or need any additional information, please let us know.

Sincerely,

TYLER PIPE INDUSTRIES, INC.

Charles Kuenemann
Safety and Security Manager

CK:dlr

P. O. Box 2027
Tyler, Texas 75710, Tel: 214/882-5511

Tyler Pipe

Subsidiary of
Tyler Corporation

May 28, 1982

OSHA Dallas Area Office
Central Place, Suite 230
1425 W. Pioneer Drive
Irving, Texas 75061

Attention: Mr. Charles M. Freeman
Area Director

Reference: OSHA Citation No.
R5407-027

Dear Mr. Freeman:

As shown on our Progress Schedule, we had planned to convert eight (8) Hot Box Core Machines to Cold Box Core Machines. Realizing that our compliance date is the first of July, 1982, we find ourselves behind schedule on the last four (4) Cold Box Machines. However, we have performed some preliminary sampling and results show that we are at the point of being in compliance at this time. We will perform further testing to determine that our abatement date will be met.

If further information is needed, please let us know.

Cordially,



Ron Howell
Design Engineering Manager

RH/cp

P. O. Box 2027
Tyler, Texas 75710, Tel: 214/882-5511

Tyler Pipe

Subsidiary of
Tyler Corporation

June 18, 1981

U. S. Department of Labor
Occupational Safety & Health Administration
Room 208 Federal Building
211 West Ferguson Street
Tyler, Texas 75702

Attention: Mr. C. R. Holder/Area Director

Dear Sir:

Regarding your letter dated June 16, 1981, we are submitting the following information as a Petition for Modification of Abatement.

1. The following projects and their completion dates are steps taken so far in an effort to achieve compliance:
 - a) Hub Core water-cooled blowheads - projects completed June 1, 1979.
 - b) Hub Core area vent doors - project completed June 1, 1979.
 - c) Ventilation and collection of dust generated at both Hub Core saws - project completed December 1, 1979. (These saws have since been eliminated).
 - d) Ventilation and collection of mullors additives barrels - project completed December 1, 1979.
 - e) Fittings Core Machines #1 and #2 enclosures and ventilation - project completed January 1, 1980.

- f) Fittings Core Machines #3 and #4 enclosures and ventilation - project completed March 1, 1980.
- g) Fittings Core Machines #5 and #6 enclosures and ventilation - project completed May 1, 1980.
- h) Fittings Core Machines #7 and #8 enclosures and ventilation - project completed July 1, 1980.
- i) Fittings Core Machines #9 and #10 enclosures and ventilation - project completed September 1, 1980.
- j) Fittings Core Machines #11 and #12 enclosures and ventilation - project completed November 1, 1980.
- k) Cold Box Hub Core Machine #1 - project completed December 1, 1980.
- l) Fittings Core Machines #13 and #14 enclosures and ventilation - project completed January 1, 1981.
- m) Cold Box Hub Core Machine #2 - project completed January 1, 1981.
- n) Cold Box Hub Core Machine #3 - project completed March 1, 1981.
- o) Fittings Core Machine #15 (final machine) enclosure and ventilation - project completed March 1, 1981.

2. At this time we would like to apply for a twelve month extension to our abatement plan.

3. The need for an extension is due to experimentation with various cold box core producing materials and the associated equipment requirements. In the origin of the existing abatement plan, we were using only one type of material for cold box core making. Since that time consideration has been given to the advantages

June 18, 1981

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and disadvantages of using this material. These considerations include which material is best suited for use from an environmental standpoint and also from a core production standpoint. Once the proper material has been selected, machine and associated equipment needs can be established. Then machine fabrication and purchasing can be initiated. We respectfully request your consideration of granting this request for an abatement extension until July 31, 1982.

4. During the existing abatement period we have required the use of respirators in this area. This program will be continued during the requested extension.
5. A copy of this petition has been posted on the company premises and will remain posted for a minimum of ten days.

If further information is needed regarding the above, please advise.

Cordially,



Ron Howell

Design Engineering Manager

RH:dv

P.O. Box 2027
Tyler, Texas 75710, Tel: 214/882-5511

Tyler Pipe

Subsidiary of
Tyler Corporation

September 20, 1982

OSHA Dallas Area Office
Central Place, Suite 230
1425 W. Pioneer Drive
Irving, TX 75061

Attention: Mr. Charles Freeman
Area Director

Ref: OSHA Citation #R5407-027

Dear Mr. Freeman:

The following are the average TWA (Time Weighted Average) exposure and the average PEL (Permissible Exposure Limit). All tests taken were below the PEL. The results are listed for the Muller operations, the Fittings Core Machines and the Hub Core Room.

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The Hub Core Room had an average TWA exposure of 0.654 and an average PEL of 2.844. There were 59 samples taken in the area.

We feel very confident with these results. The results were averaged to give an overall view of the situation in the area.

If you need any further information, please do not hesitate to let us know.

Sincerely,

TYLER PIPE INDUSTRIES, INC.

Charles Kuenemann

Charles Kuenemann
Safety and Security Manager

CK:dlr