P.O. Box 2027
Tyler, Texas 75701, Tel: 214/867-6111

Tyler Pipe
Subsidiary of
Tyler Corporation



July 25, 1973

Mr. Charles J. Adams, Area Director
Occupational Safety and Health Administration
U. S. Department of Labor
Dallas Area Office
Adolphus Tower, Suite 1820
1412 Main Street
Dallas, Texas 75202

Dear Mr. Adams:

The purpose of this letter is to request an extension of time to September 15, 1973, for our submittal of a program of either engineering or administrative controls on and dust as was pointed out in the citation we received from you dated July 6, 1973.

We feel the date of August 3, as proposed in the citation, is not sufficient time to complete a plan that will be both operable and realistic in so far as dust are concerned. At the present time we are conducting engineering studies to determine the actual sources of the dust problems. Respirators have been issued to all personnel in areas that we were cited, but we are still looking for engineering solutions. Part of the engineering studies show that the source of some of the dust problems are not directly related to the employees work station but from other areas. We should be able to complete these studies and prepare a plan with a deadline of September 15. Cleaning stations are being developed for the employee to clean his respirator. The equipment is being ordered to set up these stations.

With a deadline of September 15, we should be able to develop a plan that will be acceptable to you and a time table that will be workable for us.

Thank you very much for your assistance in this matter.

Sincerely yours,

John A. Warner

JAW:mg

P.O. Box 2027
Tyler, Texas 75701, Tel: 214/867-6111

Tyler Pipe
A Subsidiary of
Tyler Corporation

November 9, 1973

U. S. Department of Labor
Occupational Safety & Health Administration
Dallas Area Office
Adolphus Tower, Suite 1820
1412 Main Street
Dallas, Texas 75202

Reference: CSHO No. 5-3054 OSHA-1-No. 42

Attention Mr. Charles J. Adams

Gentlemen:

We enclose herewith marked up copies of our progress schedule. You will note that we are a little ahead of schedule at this time and hopefully, we can maintain the schedule in spite of growing material shortages and extended lead times.

Yours truly,

J. A. Lasater
Chief Engineer

JAL/bc

P.O. Box 2027
Tyler, Texas 75701, Tel: 214/882-6111

Tyler Pipe
Subsidiary of
Tyler Corporation

February 14, 1974

U. S. Department of Labor
Occupational Safety & Health Administration
Dallas Area Office
Adolphus Tower, Suite 1820
1412 Main Street
Dallas, Texas 75202

Reference: CSHO #5-3054 OSHA-1-#42

Attention Mr. Charles J. Adams

Gentlemen:

Enclosed is a copy of our progress schedules with the status of our projects.

We also need a 90 day extension on the pallet conveyor sand system due to design modifications. These modifications were necessary, based on our experience from previous installations.

If you need other information in order to grant this request, please notify me.

Yours truly,

Roy D. Landers
Senior Design Engineer

RDL/bc

P.O. Box 2027
Tyler, Texas 75701, Tel: 214/882-6111

Tyler Pipe

Subsidiary of
Tyler Corporation

April 11, 1974

U. S. Department of Labor
Occupational Safety & Health Administration
Dallas Area Office
Adolphus Tower, Suite 1820
1412 Main Street
Dallas, Texas 75202

Reference: CSHO #5-3054 OSHA-1-#42

Attention Mr. Charles J. Adams

Gentlemen:

Enclosed are marked copies of our progress schedules, showing progress of our dust control plans.

Yours truly,

Roy Landers

Roy D. Landers
Design Engineering Manager

RDL/bc

P.O. Box 2027
Tyler, Texas 75701, Tel: 214/882-6111

Tyler Pipe
Subsidiary of
Tyler Corporation

May 14, 1974

U. S. Department of Labor
Occupational Safety and Health Admimistration
Dallas Area Office
Adolphus Tower, Suite 1820
1412 Main Street
Dallas, Texas 75202.

Reference: CSHO #5-3054 OSHA-1-#42

Attention Mr. Charles J. Adams

Gentlemen:

We enclose herewith marked copies of our progress schedules, showing status of projects covered by our compliance plan.

Yours truly,

Roy D. Landers
Manager Design Engineering

RDL/bc

P.O. Box 2027
Tyler, Texas 75701, Tel: 214/882-6111

Tyler Pipe
Subsidiary of
Tyler Corporation

June 14, 1974

U. S. Department of Labor
Occupational Safety and Health Administration
Dallas Area Office
Adolphus Tower, Suite 1820
1412 Main Street
Dallas, Texas 75202

Reference: CSHO #5-3054 OSHA-1-#42

Attention: Mr. Charles J. Adams

Gentlemen:

Enclosed are marked copies of our progress schedules showing status of our projects.

The pallet conveyor sand system project shown on our dust control plan is not on schedule, however, we are working around the clock to complete this system as soon as possible.

3

If you need other information, please notify me.

Yours truly,

Roy D. Landers
Manager of Design Engineering

RDL/bc
Enclosures

U. S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
DALLAS AREA OFFICE
ADOLPHUS TOWER, SUITE 1820, 1412 MAIN STREET
DALLAS, TEXAS 75202
(214) 749-1786

August 29, 1974

Mr. Roy D. Landers
Design Engineering Manager
Tyler Pipe
P. O. Box 2027
Tyler, Texas 75701

Dear Mr. Landers:

In reply to your letter of August 16, 1974, this is to confirm that the changes within your planned program of engineering or administrative controls are approved by this office.

If we may be of further assistance, please let us know.

Sincerely,

TOM LITTRELL
Acting Area Director
Dallas Area Office

P.O. Box 2027
Tyler, Texas 75701, Tel: 214/882-6111

Tyler Pipe

Subsidiary of
Tyler Corporation

August 16, 1974

U. S. Department of Labor
Occupational Safety & Health Administration
Dallas Area Office
Adolphus Tower, Suite 1820
1412 Main Street
Dallas, Texas 75202

• Reference: OSHO #5-3054 OSHA-1-#42

Attention Mr. Charles J. Adams

Gentlemen:

Enclosed are marked copies of our progress schedules showing status of our projects.

Due to slow delivery of material and the complexity of this job, the Pallet Conveyor Sand System project is not on schedule. Shown on the dust control plan is a projected realistic completion date.

The Hot Coat Sand System project is now being engineered and is on schedule.

If you need other information in order to approve this request, please notify me.

Yours truly,

Roy Landers

Roy D. Landers
Design Engineering Manager

RDL/bc

P.O. Box 2027
Tyler, Texas 75701, Tel: 214/882-6111

Tyler Pipe
Subsidiary of
Tyler Corporation

November 15, 1974

U. S. Department of Labor
Occupational Safety & Health Administration
Dallas Area Office
Adolphus Tower, Suite 1820
1412 Main Street
Dallas, Texas 75202

Reference: CSHO #5-3054 OSHA-1-#42

Attention: Mr. Charles J. Adams

Gentlemen:

Enclosed are marked copies of our progress schedules, showing progress of our dust control plans.

Yours truly,

Roy D. Landers
Design Engineering Manager

RDL/cl

P.O. Box 2027
Tyler, Texas 75701, Tel. 214/882-6111

Tyler Pipe
Subsidiary of
Tyler Corporation

December 15, 1975

U.S. Department of Labor
Occupational Safety & Health Administration
Dallas Area Office
Central Place
1425 West Pioneer Drive
Irving, Texas 75061

Attention: Tom Littrell, Sr. Compliance Officer

Dear Mr. Littrell:

Enclosed is the Bar Graph illustrating the current status of Tyler Pipe's Dust Control Projects.

The Pallet addition installation is now complete and in operation.

The Hot Coat System Scrubber installation is still on schedule.

Regarding the "Buffalo Forge Company" strike, no settlement has been reached at this time. As mentioned in our previous report, this company is furnishing the fans for all of the remaining systems listed on the Progress Schedule Bar Graph. "Enviroclear" has notified us that the fans required for the 456 System & 234 System have been entered into the production schedule of the "Buffalo Forge" Mexico City, Mexico, plant. However, the date of shipment for these two units is about a month later than the previous date promised to us prior to the strike. The remaining fans are still planned for manufacture in the Buffalo, N.Y., plant. Certain phases of our installations can proceed without the respective fans for those particular projects. Hopefully, the strike can be resolved soon in order that the overall completion of installations will not be affected.

We will continue to keep you informed of our progress on these projects and any significant progress made in "Buffalo's" strike negotiations.

If you have any questions, please call.

Sincerely,

Ron Howell

Ron Howell
Environmental Engineer

RH/lr

Enclosure

P.O. Box 2027
Tyler, Texas 75701, Tel 214/882-6111

Tyler Pipe

Subsidiary of
Tyler Corporation

September 16, 1974

U.S. Department of Labor
Occupational Safety & Health Administration
Dallas Area Office
Adolphus Tower, Suite 1820
1412 Main Street
Dallas, Texas 75202

Reference: OSHA No. 5-3054 OSHA-1-No. 42

ATTENTION: Mr. Charles J. Adams

Gentlemen:

Enclosed are marked copies of our schedule showing progress of projects.

All projects are now progressing on schedule as shown.

If further information is required by you, please advise.

Yours truly,

Roy D. Landers
Design Engineering Manager

RDL/cl

P.O. Box 2027
Tyler, Texas 75701 . Tel. 214/882-6111

Tyler Pipe
Subsidiary of
Tyler Corporation

February 17, 1975

U.S. Department of Labor
Occupational Safety & Health Administration
Dallas Area Office
Adolphus Tower, Suite 1820
1412 Main Street
Dallas, Texas 75202

Reference: OSHA No. 5-3054 OSHA-1- No. 42

ATTENTION: Mr. Charles J. Adams

Gentlemen:

Enclosed are marked copies of Dust Control Plans showing progress of each project.

Yours truly,

Roy D. Landers
Design Engineering Manager

RDL/cl

Enclosures

P.O. Box 2027
Tyler, Texas 75701, Tel: 214/892-6111

Tyler Pipe
Subsidiary of
Tyler Corporation

September 19, 1975

U.S. Department of Labor
Occupational Safety & Health Administration
Dallas Area Office
Adolphus Tower, Suite 1820
1412 Main Street
Dallas, Texas 75202

Attention: Tom Littrell

Dear Mr. Littrell:

Thank you for the approval of our revised progress schedule. We will make every effort to keep you informed of the extent of our progress on each project as outlined.

Enclosed is our bar graph of planned work to be done. It has been marked to define the present status of the various efforts required on each project.

The Pallet modification is on schedule as noted. The installation has been completed and is now in the shakedown and contingency phase of operation. We are experiencing some periodic "plugging" of duct-work in two branches of the system. "Kirk & Blum" is at present evaluating this problem in order to make recommendations for its solution. Other than this difficulty the system is functioning satisfactorily.

Regarding the Pallet addition project, the purchases are somewhat behind schedule. We have talked with "Enviroclear" concerning the delivery of a sludge ejector being furnished by them. At present the actual delivery date of this item is still in question due to unexpected extended delivery of some integral components for the ejector. Other than this item, all other work is on schedule.

If you have any questions, please call.

Sincerely,

Ron Howell

Ron Howell
Environmental Engineer

RH/cl

P.O. Box 2027
Tyler, Texas 75701, Tel: 214/882-6111

Tyler Pipe
Subsidiary of
Tyler Corporation

November 4, 1975

U.S. Department of Labor
Occupational Safety & Health Administration
Dallas Area Office
Adolphus Tower, Suite 1820
1412 Main Street
Dallas, Texas 75202

Attention: Tom Littrell, Sr. Compliance Officer

Dear Mr. Littrell:

Enclosed is Tyler Pipe's Progress Schedule of Planned Dust Control Projects.

In our last report, the delivery date of a sludge ejector from "Enviroclear" was in question. This unit is for use on the Pallet Addition Collector System. This item stalled the completion of the installation phase of our progress. However, the ejector was received October 27, and is now in the final stage of installation. All efforts are being made to complete the plumbing and electrical connection of the ejector by the week beginning November 9, 1975. This is the last component required prior to operating and balancing the ventilation system.

The Hot Coat System is proceeding on schedule, as planned, with our engineering phase being somewhat ahead of schedule at this point.

We were notified Friday, October 31, that "Buffalo Forge Company" is on strike. "Enviroclear" called and said that they had just been informed of the fact that "Buffalo" had been on strike since October 2, 1975. It is not known at this time when a settlement will be reached. Our primary concern is that "Buffalo" is furnishing not only the induced draft fans for the 456 System and 234 System but all of the fans required for the remaining systems listed on our dust control plan. These fans are being furnished through "Enviroclear", our scrubber systems supplier, and we are in contact with them on a daily basis regarding the status of the strike by the "Buffalo Forge" personnel.

We will be keeping you informed of any headway made involving the strike negotiations and other progress regarding the various phases of project completion efforts.

If you have any questions, please call.

Sincerely,

Ron Howell

Ron Howell
Environmental Engineer

RH/cl

Enclosure

P.O. Box 2027
Tyler, Texas 75701, Tel: 214/882-6111

Tyler Pipe
Subsidiary of
Tyler Corporation

February 3, 1976

Occupational Safety & Health Administration
Central Place
1425 West Pioneer Drive
Irving, Texas 75061

Attention: Mr. Tom Littrell
Sr. Compliance Officer

Dear Mr. Littrell:

A copy of our progress schedule regarding dust control projects is enclosed.

We now have the Hot Coat System scrubber equipment on stream and are in the shake-down operation phase of final completion. "Kirk & Blum" has balanced the ductwork system and all volumes, pressures, and power requirements for this ventilation system are at expected performance. An air heater is being added to the mullor exhaust duct for supplemental heat which is necessary to keep the condensibles above dew point. The objective of this effort is to keep this duct open by reducing the possibility of "plugging" which might occur. This heater unit will be installed when received from the supplier.

Installation of the 456 Dust Control System is in progress. As noted in our last report of December 15, 1975, the fan for this system is being manufactured in Mexico City, Mexico. "Enviroclear" has notified us that "Buffalo Forge" has given a completion date for mid-February. Since our last correspondence with you, all orders for fans from "Buffalo Forge" have been transferred to their Mexico Plant. These include not only the 456 and 234, but also those required for the remaining systems listed on our progress schedule bar graph. This is due to the fact that the plant in Buffalo, New York, is still on strike and no optimistic date for a settlement can be established. We will continue efforts to get the earliest possible delivery dates for all remaining fans to be manufactured.

The motor manufacturer is also behind schedule with deliveries. The motor for the 456 System fan has now been scheduled for completion by the end of February.

Hopefully, these delays will not alter our final completion dates. We are proceeding with other stages of the installation which can be accomplished without the need for the fan and motor at this point.

More firm delivery dates have been requested for the 234 System and U.C.U. System, the next projects in sequence planned on our progress schedule.

We are making firm efforts toward improving the problem of these interim delays and will keep you informed of future developments.

If you have any questions prior to our next report, please call.

Sincerely,

Ron Howell

Ron Howell
Environmental Engineer

RH/cl

Enclosure

P.O. Box 2027
Tyler, Texas 75701, Tel 214/592-6111

Tyler Pipe
Subsidiary of
Tyler Corporation

March 24, 1976

Occupational Safety & Health
Administration
Central Place
1425 West Pioneer Drive
Irving, Texas 75061

Attention: Mr. Tom Littrell
Sr. Compliance Officer

Dear Mr. Littrell:

We are enclosing our latest Progress Schedule Bar Graph.

With regard to the 456 System, we finally received our fan, motor, and pumps. As you know, these purchased items were running behind our vendor's scheduled delivery dates. These components have now been installed and final adjustments are now in progress.

The 234 System installation has just begun. We are working toward establishing firm shipping dates from our suppliers.

As noted on the bar graph, purchases and fabrications for the U.C.U. and JJR I Systems are also somewhat behind schedule. Hopefully, we can expedite these deliveries prior to a serious delay.

This report represents our most current progress and efforts toward completion of these installations. Please do not hesitate to call if further information is required.

Cordially yours,

Ron Howell

Ron Howell
Environmental Engineer

RH/cl

Enclosure

P.O. Box 2027
Tyler, Texas 75701, Tel 214/882-5511

Tyler Pipe
Subsidiary of
Tyler Corporation

June 15, 1976

Occupational Safety & Health Administration
Central Place
1425 West Pioneer Drive
Irving, Texas 75061

Attention: Mr. Tom Littrell
Sr. Compliance Officer

Dear Mr. Littrell:

We have enclosed a copy of our most recent progress schedule.

At this point we have received and installed all of the purchased items which were "lagging" behind schedule. The system is now being cycled and final adjustments are being made. Therefore, the preparation of this unit for shakedown operation is somewhat ahead of schedule.

Engineering has been completed for the U.C.U. System and installation can proceed. Some purchased items are behind schedule and have not been received, but other stages of installation can be accomplished at this time.

The JJR I System is proceeding as planned, other than the receiving of some purchased items which should not hold up the progress of this project.

This is the status of our most current dust control efforts at this time. If further information is desired, please advise.

Cordially yours,

Ron Howell

Ron Howell
Environmental Engineer

RH/cl

Enclosure

P.O. Box 2027
Tyler, Texas 75701, Tel: 214/882-6111

Tyler Pipe
Subsidiary of
Tyler Corporation

July 29, 1976

Occupational Safety & Health Administration
Central Place
1425 West Pioneer Drive
Irving, Texas 75061

Attention: Mr. Tom Littrell
Sr. Compliance Officer

Dear Mr. Littrell:

We have enclosed a copy of the Progress Schedule Bar Graph which depicts our current status regarding completion of dust control projects.

The 234 Scrubber Systems is now on stream and operating in the shakedown phase. Since our last report we have experienced a transformer malfunction on this system. A new three-phase transformer was installed with this project. While cycling the scrubber system, the sub station primary winding burned out. The manufacturer has accepted responsibility for the defective winding and is repairing the unit. Until repairs are completed, we have temporarily installed three single phase transformers in order to operate the scrubber system.

In addition to the transformer difficulties, the standby recycle pump has failed to operate satisfactorily. The pump manufacturer is furnishing components to replace the defective parts.

Installation of the U.C.U. Scrubber System has begun. During assembly and installation of the fan, a crack in the fan wheel hub was discovered. The fan manufacturer has been notified and is evaluating the severity of the fracture. Other stages of installation can proceed while working toward a solution to this problem.

Regarding the JJR I, JJR II, and Overhead Sand "A" and "B", the ductwork fabrications are behind schedule due to a strike which occurred approximately five or six weeks ago. The supplier of the ductwork for these systems notified us this week that the strike is now over and fabrication can continue.

On the morning of July 13, the 456 System Scrubber fan and motor drive coupling stripped the gear teeth. The system was out of service until approximately 8:30 P.M. that night. This system has been in operation since mid-April. The supplier of the coupling is checking the possible cause of failure of the stripped components in order to prevent a reoccurrence of this incident.

If further information is needed prior to our next report, please advise.

Cordially,

Ron Howell

Ron Howell
Environmental Engineer

RH/cl

Enclosure

P.O. Box 2027
Tyler, Texas 75701, Tel: 214/882-6111

Tyler Pipe
Subsidiary of
Tyler Corporation

December 15, 1976

Occupational Safety & Health Administration
Central Place
1425 West Pioneer Drive
Irving, Texas 75061

Attention: Mr. Tom Littrell
Sr. Compliance Officer

Dear Mr. Littrell:

We are enclosing a copy of our Progress Schedule Bar Graph noting our most current status in dust control efforts.

Installation of the JJR I System is on schedule. The equipment portion of this system is in place and the ductwork is now being routed to the emission sources.

Equipment has also been located in place for the JJR II System. As mentioned in our previous report, this was done in order to expedite the installation of the JJR II System.

We have begun our engineering for the Overhead Sand System "A". Due to supplier's engineering being late, we are somewhat behind schedule at this point. Efforts are being made to accelerate our engineering phase in order to get back on schedule. Fabrications from the supplier are also lagging on this system and Overhead Sand System "B". At this time these late deliveries are not expected to delay final installation dates.

If further information is needed prior to our next report, please advise.

Cordially,

Ron Howell

Ron Howell
Environmental Engineer

RH/cl

Enclosures

April 29, 1977

TO: John Warner
James Milstead
Bud Gladish
Earl Davis
Charles Kuenemann ✓

FROM: Ron Howell

SUBJECT: Tyler Pipe OSHA Compliance Plan Records

Since Tyler now has an OSHA area office, all records and correspondence previously sent to the Dallas office have been transferred to the Tyler area office. All future communication will be directed to:

U.S. Department of Labor
Occupational Safety & Health Administration
U.S. Federal Building
Room 206-208
Tyler, Texas 75702

Attention: Mr. Bob Simmons
Area Director

Phone No: 595-2438

Ron

RH/cl

P.O. Box 2027
Tyler, Texas 75701, Tel: 214/882-6111

Tyler Pipe
Subsidiary of
Tyler Corporation

April 29, 1977

U.S. Department of Labor
Occupational Safety & Health Administration
U.S. Federal Building
Room 206-208
Tyler, Texas 75702

Attention: Mr. Bob Simmons
Area Director

Dear Mr. Simmons:

We are enclosing a copy of our progress schedule regarding the status of dust control projects.

The JJR I 400 H.P. motor that failed is still being repaired in the manufacturer's repair shop. The system remains in operation using a spare 400 H.P. motor.

Since our last report we have experienced similar problems with the 400 H.P. motor on the JJR II Scrubber System. As we discussed by telephone with Mr. Kotrla of your office, we only had one spare motor which is currently in use on the JJR I System as mentioned above. Therefore, the JJR II System has been out of service. We have just received the repaired JJR II motor from the manufacturer and expect to have this system back on stream by May 1, 1977.

Overhead Sand System "A" and System "B" have been installed and are now operating. These two systems are being monitored to determine final adjustments for the most efficient operation. Hopefully, we will not encounter motor malfunctions on these two systems.

We will be submitting our next report on the shakedown operation of these two systems in about six weeks. If you have questions prior to that time, please advise.

Cordially,

Ron Howell

Ron Howell
Environmental Engineer

RH/cl

Enclosure

April 27, 1976

Dust Survey

Unit Inspections for OSHA Committee

In reference to the memo on "Unit Inspections for OSHA Committee" for the month of April, it was requested that a dust survey be run on the 2-3-4 Machine, the Stripper Casting Unit, and the Plastics Plant. The following report contains a group of dust sample sheets for each of these units, each sheet containing pertinent information dealing with a particular location on the unit, as well as the complete calculations for each dust count.

All samples in this report were collected using the MSA Midget Impinger Sampling Unit, with Isopropyl Alcohol used as the collection media. The light-field microscopic technique was used to determine dust concentrations.

Dust Survey

(Unit Inspections for OSHA Committee)

Location and/or Station	Dust Concentrations Mppcf	TLV*	Per Cent Free Silica*
I. 234 Pipe Machine			
Pour Station	2.9	5	40
East Slinger	20.2	6	36
West Slinger	20.2	7	30
Muller	4.9	4	60
Shakeout	3.4	3	63
Reamer	3.5	3	63
Brush Station	9.7	5	40
Dip Tank	1.7	16	10
Bundling Area	1.1	16	10
II. Utility Casting Unit			
Shakeout	6.4	3	60
Muller	6.4	3	60
East Pour	6.8	7	30
East Weight & Binder	6.4	12	15
West Weight & Binder	8.7	12	15
#4 Green Core Area	3.8	14	12
West Pour	5.4	14	12
West Molding Area	7.5	7	30
East Molding Area	4.7	14	12

* Note: These figures are derived from previous test results.

Location and/or Station	Dust Concentrations Mppcf	TLV*	Per Cent Free Silica*
III. Plastics Plant			
Machine Shop	1.4	16	10
Fitting Process Line	2.3	16	10
In Process Area	1.6	16	10
Pipe Extrusion Area	1.1	16	10
Grinding Room	2.0	16	10

* Note: These figures are derived from previous test results.

October 18, 1976

M E M O

TO: Charles Kuenemann

FROM: Don Cook

SUBJ: Vinyl Chloride Monomer in PVC Manufacturing Area (Plastics Plant)

At your request, the air surrounding the PVC pipe manufacturing area was sampled and tested for Vinyl Chloride Monomer (VCM). Niranjan Shah sampled and analyzed these areas by the following referenced publications:

(1) "Gas Chromatographic Analysis of Vinyl Chloride Monomer," T.E. Purcell, Perkin-Elmer No. GCD - 43, Jan. 1975.

(2) "Gas Chromatographic Determination of Vinyl Chloride Monomer in Air Samples Collected on Charcoal," R.H. Hill Jr., U.S. Dept. of H.E.W., NIOSH, Analytical Chemistry Vol. 48, No. 9, August 1976.

Ten liters of air sample were drawn through the charcoal packed tube at a rate of 1.89 liters per minute. Samples were taken in three areas; (1) on the floor near the Operator's desk, (2) 3 ft. above the floor in this same area, and (3) 2 ft. above the floor where the pipe is being sawed. The sample tubes were returned to the Laboratory where they were heated to 300°C, driving off any entrapped organic vapors. These vapors were collected in a coil immersed in liquid nitrogen. Subsequent heating of these cooling coils caused the frozen compounds to vaporize and be swept into the gas chromatographic column.

Levels of VCM detected are listed below:

Sample Area*	VCM
1	1.78 ppb
2	3.34 ppb
3	None detected

* See previous description of sample areas.

As can be seen from these results, our Plastics Plant is well below the TLV of 1.0 ppm for Vinyl Chloride Monomer.

If there are other areas to be tested, please contact me and we will identify them and set up the testing.

Don Cook
Technical Services

October 5, 1976

M E M O

TO: Charles Kuenemann

FROM: Thomas Whitehead

SUBJ: Dust Surveys on the 456 Unit

Upon your request, a dust survey was run on the Operators of the North Slinger Station and the Shakeout Station on the 456 Pipe Machine. All samples were drawn on the day shift under the supervision of Grady Dark. At the time of these tests, the machine was producing four - inch double hub pipe.

On August 11, 1976 the first sample was pulled on Willie Warfield, Operator of the North Slinger Station. A Monitaire Sampler Unit was used for this test, which lasted for 377 minutes. Willie was wearing all his safety equipment, including a respirator. All fans and man-coolers in his area were operational. Results of the test are as follows:

Volume Pulled	.64082 cu meters
Filter Gain	.00011 grams
Concentration	.17166 mg/m^3
Free Silica	12% (OSHA Analysis)
TLV	.714 mg/m^3

On August 17, 1976 two more samples were run, one on the Shakeout Operator, and another test on Mr. Warfield. The Monitaire Sampler was

used on the Shakeout Operator, Robert Mumphrey, with the test lasting a total of 481 minutes. Mumphrey was not wearing a respirator, but all mancoolers and fans in his area were operational. The results of this test are as follows:

Volume Pulled	.817596	m^3
Filter Gain	.00238	grams
Concentration	2.911	mg/m^3

The second test on Warfield was run with a millipore filter unit and a calibrated orifice attached to a vacuum pump, instead of the Monitaire Sampler. The purpose of the change in the sampling apparatus was to try to obtain greater volume for the same time span as the other test. The total testing time was 482 minutes. Results of the test are as follows:

Volume Pulled	1.4458	m^3
Filter Gain	.00743	grams
Concentration	5.139	mg/m^3

(Note: In this test, the sampling apparatus was not worn by the Operator, but rather was permanently mounted along side the work location.)

In conclusion, it appears that the test run on August 11 was well under the threshold limit value determined by OSHA personnel. The August 17 tests, however, are significantly above this TLV. Further tests will be scheduled to verify whether or not there is a serious problem present in these areas.

Thomas Whitehead

Thomas Whitehead

May 28, 1976

TO: Charles Kuenemann

FROM: Larry Bridges

SUBJECT: 21,000 CFM Herman Pallet Scrubber - Duct Heating

The following are to be installed in June, 1976.

C-4879 Piping Schematic

C-4881 Wiring Diagram

A sequence of operation sheet and assembly drawings are included for your reference.

Larry Bridges

LB/cl

SEQUENCE OF OPERATION

1. Start scrubber fan. When fan is started, the burner panel should be energized and a "power'on" light should illuminate to show this. Also, a purge-cycle timer with a light should start and the light remain on until the purge cycle times out. (approximately 90 seconds)

2. When the purge cycle light goes out, the burners are ready to start. Press "start" button for each burner. A light should illuminate to show that each burner is on.

3. Safeties:

   (a) If flame is lost in one of the burners, its flame rod will automatically shut off the gas supply to the respective burner. An audible alarm will sound if any of the burners shut down.

   (b) If the scrubber fan shuts down, an air flow switch will shut gas off to all burners and the audible alarm will sound.

   (c) When de-energizing the dust control system, the burner system should be shut off first, so that the duct system does not become overheated.

Note:

At the burner control panel, label all burners per their location as follows:

(1) Belt - West

(2) Belt - Center

(3) Belt - East

(4) Elevator Boot - West

(5) Elevator Boot - East

(6) Elevator Housing - East

(7) Sand Bin - South

(8) Sand Bin - North

5-24-76

June 9, 1978

TO: James Milstead
Bud Gladish

FROM: Ron Howell

SUBJECT: Preliminary Action Toward OSHA Citation Abatement

FITTINGS CORE MACHINES EXHAUST

Due to excessive dust concentrations in the area of the Fittings Core Machines, ventilation of this area is necessary. In discussions with "Kirk & Blum Mfg. Co.", a large fabricator of dust control systems, and the American Foundrymen's Society's Environmental Department, it was learned that other users of core machine equipment are discharging vent stacks directly to atmosphere instead of employing the use of control devices. In the Texas Air Control Regulations, the installation of a core machine is exempt from the requirement of a construction permit. Since this is the case, an interpretation can be made that no collection equipment is necessary for core machines.

Based upon the above (2) Fittings Core Machines will be fitted with booth type enclosures and ventilated with a common fan and exhausted through the roof to atmosphere. The stack discharge will then be observed for visible emissions. If emissions are within an acceptable range of opacity, Richard Leard can be contacted for his opinion on this arrangement or the stack can be considered as "comfort ventilation" and we can proceed with exhausting other machines without notifying the Texas Air Control Board.

HUB CORE BUILDING

If it is possible to convert all hub core production to Isocure, the existing hub core machines can be obsoleted. This action would eliminate the major dust emissions from these machines. In order to experiment with the practicability of converting hub core production to Isocure, a period of approximately 120 days will be required for R&D work.

In order to reduce dust generated by these machines in the interim, water-cooled blowheads are being designed and installed. In addition the exhaust valves on these machines will be vented into a container of water in order to evaluate the amount of dust discharged in a period of time. When this has been determined, an evaluation of the best means of control can be established.

Dust control on the remaining B&P Core Machines and Shalco Core Machines will be based upon the results of the experimental enclosures and ventilation of the two Fittings Core Machines.

Also in this area are (2) core saws which require ventilation. The dust generated from these saws should be exhausted to a collector. However, instead of using a control device for the saws only, a determination of the requirement for control devices on core machines should first be made from observation of the stack discharge at the two Fittings Core Machines to be enclosed.

HOT COAT MULLOR AREA

In order to prevent thermal currents from carrying fine dust through the mullor operator's open grated deck, solid floor plate will be installed on this platform. In addition, due to fugitive dust falling from overhead on the operator, a roof shield will be installed above the mullor operator.

Ventilation of the barrels containing mullor additives is being investigated. Dust from some of these additives is flammable and could create an explosion under certain conditions.

FUGITIVE DUST SOURCES

"Head Industrial Services" has been contacted for a quote on the cost for vacuuming overhead structures in the areas of the Hub Core Building, Fittings Core Machines, and the Hot Coat Mullor. The rate of deposited fugitive dust can be evaluated to determine the difference in cost of either purchasing a vacuum unit or pay for the services of an outside cleanup unit.

Due to the experimental work involved in these areas, we feel that an extension of 120 days is necessary for submitting an abatement plan and progress schedule.

Ron Harrell

RH:cl

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

Tyler Pipe
Subsidiary of
Tyler Corporation

February 27, 1979

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

Attention: Mr. C.R. Holder
Area Director

Dear Sir:

We are enclosing a copy of our Progress Schedule in bar graph form. This graph notes all projects proposed in our dust control plan submitted November 27, 1978. The bar graph is marked to indicate the phase of progress as of this date. As depicted by the line indicating March 1, 1979, we are complete with engineering for "Hub Core Area Vent Doors" and all other projects are on schedule.

As each report of progress is submitted each quarter, an updated bar graph will be included. Hopefully, this will be a clear and simple means of communicating the current status of progress phases.

If you have further questions or comments, please advise.

Cordially,

Ron Howell

Ron Howell
Manager of Design Engineering

RH/cp

Enclosures

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

Tyler Pipe

Subsidiary of
Tyler Corporation

August 28, 1980

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:

Enclosed is a copy of our Dust Control Progress Plan. The core machines enclosures and ventilation projects are on schedule as shown.

Since our last report, we have completed engineering on the new design of Cold Box Hub Core Machine. It is now well into fabrication. Wiring and controls are being installed at this time. We plan to cycle and make cores in the Construction Shop the week of September 1, 1980. Once the cores are proven satisfactory for pipe casting, the machine will be moved to production and manufacturing can begin on the second machine.

If further information is needed, please advise.

Cordially,

Ron Howell

Ron Howell

Design Engineering Manager

RH:dv

Encl.

Charles Rueneman.

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

Tyler Pipe

Subsidiary of
Tyler Corporation

May 30, 1980

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:

We are enclosing a copy of our Dust Control Plan Progress Schedule. As indicated, we have made little progress in the area of the Cold Box Core Machines. Much effort and expense have been applied toward making this prototype a successful venture. We are now proceeding in the design phase with an alternate concept of core machine. This concept appears to be a less complex machine. It incorporates a two-piece core box and production of two cores per cycle. At this time we plan no more work on the more complex core machine. All efforts will be directed toward the new design machine.

All other projects are on schedule. If further information is needed, please advise.

Cordially,

Ron Howell

Ronald B. Howell
Design Engineering Manager

/cp

Enclosure

Tyler Pipe
Subsidiary of
Tyler Corporation

Iron Power

Time:	6 Am	7 Am	8 Am	9 Am	10 Am	11 Am	
	88°	93	94	92	93	93	94
Corsette							
	83	85	86	89	90	89	90
Strike out							
	84	87	90	89	89	93	92
Core Machine op.							
	~~88°~~	~~89~~	~~[illegible]~~	~~90~~			
	94	88	89	90	91		

— AMBient Temp —

11 Am — 85°F 85 Am 75°F

605

P. O. Box 2027
Tyler, Texas 75710. Tel 214/882-5611

Tyler Pipe

Subsidiary of
Tyler Corporation

August 28, 1980

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:

Enclosed is a copy of our Dust Control Progress Plan. The core machines enclosures and ventilation projects are on schedule as shown.

Since our last report, we have completed engineering on the new design of Cold Box Hub Core Machine. It is now well into fabrication. Wiring and controls are being installed at this time. We plan to cycle and make cores in the Construction Shop the week of September 1, 1980. Once the cores are proven satisfactory for pipe casting, the machine will be moved to production and manufacturing can begin on the second machine.

If further information is needed, please advise.

Cordially,

Ron Howell

Ron Howell

Design Engineering Manager

RH:dv

Encl.

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

Tyler Pipe

Subsidiary of
Tyler Corporation

March 2, 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:

We are enclosing a copy of our Dust Control Progress Schedule. All "Fittings Core Machines Ventilation" projects are now complete.

We have completed three (3) of the new design Cold Box core machines and they appear to be working satisfactorily. With these machines in operation, we have eliminated three (3) of the Hot Box core machines which were sources of silica dust. Work is still progressing toward installation of the additional Cold Box machines which will significantly reduce the number of Hot Box machines in this area.

If further information is needed, please advise.

Cordially,

Ron Howell

Design Engineering Manager

RH:dv

Encl.

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

Xerox

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

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

Ron Howell

Design Engineering Manager

RH:dv

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

Tyler Pipe

Subsidiary of
Tyler Corporation

August 27, 1981

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

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

Dear Sir:

We appreciate your granting an extension for our Cold Box Core Machines project. Experimentation is in progress on two (2) materials for the cold box process. Another material has been introduced by one of our vendors which will also be tried for core production within the next two months. We feel that we will make a decision to use one of these three (3) materials and not search any further for any other alternates.

We will keep you thoroughly informed regarding our progress on this project.

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

November 24, 1981

U. S. Department of Labor

Occupational Safety and Health Administration

Room 208 Federal Building

211 West Ferguson St.

Tyler, Texas 75702

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

Dear Sir:

Since our last report we have completed our experimentation on the various materials for use on the Cold Box Core Making Process.

With this decision now firm we are proceeding with design, fabrication and purchasing for three additional Hub Core machines. When these are completed, we will have a total of six Cold Box Hub Core machines in operation. At this time we should be able to tell whether or not we will need the other two machines as outlined in our original abatement plan.

If further information is needed, please advise.

Cordially,

Ron Howell

Ron Howell

Design Engineering Manager

RH:dv

P O Box 2027
Tyler, Texas 75710 Tel 214 882 9611

Tyler Pipe

Subsidiary of
Tyler Corporation

February 26, 1982

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

Attention: Mr. C.R. Holder
Area Director

Dear Sir:

We have the fourth Cold Box Core Machine almost complete. When we receive two valves, the control circuit can be completed and the machine can be cycled. We expect this machine to be in operation by the end of March, 1982.

Purchases are on order and some fabrications are in work for the fifth and sixth cold box machines.

If further information is needed, please let us know.

Cordially,

Ron Howell

Ron Howell
Design Engineering Manager

RH/cp

U.S. Department of Labor

Occupational Safety and Health Administration
1425 W. Pioneer Drive, Suite 230
Irving, Texas 75061-7181 214/259-6683
Reply to the Attention of: Metro: 251-1786

July 19, 1985

Mr. Charles Kuenemann
Safety and Security Manager
Tyler Pipe
P. O. Box 2027
Tyler, Texas 75710

Dear Mr. Kuenemann:

A summary of employee exposure results from samples collected for airborne silica (Quartz) on May 15 and May 21, 1985, follows in accordance with your request of June 24, 1985:

JOB TITLE	PERMISSIBLE EXPOSURE LEVEL	3-HOUR TIME-WEIGHTED AVERAGE
	Location: "234" Molding Line - May 15, 1985	
Slinger Operator		Non detected
Muller Operator	0.769 mg per cubic meters	0.746. mg per cubic meters
Slinger Operator	2.44 mg per cubic meters	1.57 mg per cubic meters
	Location: "456" Molding Line - May 21, 1985	
Slinger Operator	0.315 mg per cubic meters	0.634 mg per cubic meters
Core Setter	0.705 mg per cubic meters	1.266 mg per cubic meters
Muller Operator		Non detected

Thank you for your continued interest in employee safety and health.

Sincerely,

JAMES T. KNORPP
Area Director
Dallas Area Office

U.S. Department of Labor

Occupational Safety and Health Administration
1425 West Pioneer Drive, Suite 230
Irving, Texas 75061-7181 Metro: 251 1786

CERTIFIED MAIL P 258-900-395
RETURN RECEIPT REQUESTED

Reply to the Attention of: H-4995

August 21, 1986

Mr. John Warner, President
Tyler Pipe Industries
P. O. Box 2027
Tyler, TX 75710

Dear Mr. Warner:

On June 30, 1986, the Occupational Safety and Health Administration (OSHA) received a notice of safety and/or health hazards at your worksite.

The specific nature of the alleged hazards is as follows: In the Permanent Mold Wheel Dept., Shell Core Area and Muller Area.

1. 29 CFR 1910.1000 - Employee exposure to excessive ambient heat during casting operations, i.e., during pouring and core set operation. Also smoke from cupola exposes employees to silica, dust, and chemicals from the core set.

We have not determined whether the hazards, as alleged, exist at your workplace; and we are not conducting and inspection at this time. However, since allegations of violations have been made, you should investigate the alleged condition(s) and make any necessary corrections or modifications. Please advise me in writing by September 12, 1986 of your findings and of the action you have taken such as monitoring results, new equipment, orders and the like, as well as photograph(s) of the corrected condition. If you desire assistance in determining abatement methods for the alleged hazards, please feel free to contact this office. Also, if you desire to participate in the Texas State Consultation Program, please contact this office for details.

The complainant has been advised of this preliminary response to the complaint and furnished a copy of this letter. Section 11(c) of the Occupational Safety and Health Act of 1970 (Public Law 91-596) provides that "No person shall discharge or in any manner discriminte against any employee because such employee has filed any complaint...or because of the exercise by such employee on behalf of himself or others of any right afforded by this Act."

This letter is not a citation, nor is it a notification of proposed penalty, which according to the OSHAct, may be issued only after an inspection or investigation of the workplace. If we do not receive a response from you indicating that appropriate action has been taken or that no hazards exists and why, an inspection may be conducted.

In addition, OSHA's policy is to select for inspection a random sample of cases where we have received letters in which employers have indicated satisfactory corrective action to ensure that the employer has actually taken the action asserted in his letter.

Finally, any action taken by you in this matter will not automatically remove your workplace from the possibility of an unannounced inspection by duly authorized representatives of OSHA in accordance with routine scheduling procedures currently in effect.

You are requested to post a copy of this letter and your response to it where it will be readily accessible for review by all of your employees.

In addition to its function of inspecting workplaces, the OSHA Area Office has been expanded to become a full service resource center, offering a wide range of safety and health related services in response to the needs of the working public, both employers and employees. These services include training and education, consultation, voluntary compliance programs and assistance in correcting hazards.

If you have any questions concerning this matter, please contact the Area Office at the address in the letterhead. Your personal support and interest in the safety and health of your employees is appreciated.

Respectfully,

for J. T. KNORPP
Area Director
Dallas Area Office