

To H. S. WELLMAN

Location

From E. E. SWAIN, JR.

Location

B-2373

Phone  
No.

Subject

Date 7/12/73

A proposed response to Halliburton is attached. If  
you concur, I suggest that you also clear with E. L. Grimm.

SAFETY LOWERS THE COST OF LIVING

G-88 REV. 10-62

N38285

July 12, 1973

Halliburton Company

This is in response to your request for information pertaining to thermal decomposition products which might result from your welding of metal painted with Imron® polyurethane enamel.

Since we are not familiar with the variety of conditions under which you may weld painted metal, it is difficult to evaluate the potential hazards. While we have not actually analyzed the thermal decomposition products of these paints, we presume that the ultimate decomposition products would include CO, CO<sub>2</sub>, oxides of nitrogen, and in the case of 826y-67769, oxides of lead and chromium. Other more complex decomposition products such as isocyanate compounds could also be generated.

As you know, OSHA regulations require that employees must be protected from exposure to concentrations of toxic materials in excess of the limits specified in Subpart G, Section

N38285.01

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1910.93 of the Occupational Safety and Health Standards. You may wish to analyze the air in your workers' breathing zone if you feel that there is any possibility that the ventilation is inadequate.

Welding, cutting, or heating of metals containing or coated with toxic metals such as lead and chromium is also covered by Part 1926.352 and .353 of the Federal Safety and Health Standard <sup>← adopted by OSHA -</sup> which is also administered by OSHA. You may wish to determine whether your operations are subject to these regulations which we understand apply to federal or federally assisted contracts. A copy of these two sections is attached for your review.

We hope that the above information will assist you in your determination of whether or not your welding operations comply with federal safety requirements.

H. S. WELLMAN