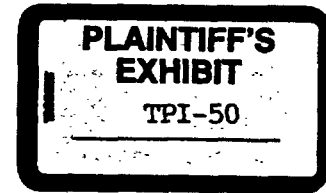


Tylor Pipo

Subsidiary of
Tyler Corporation



August 31, 1982

Occupational Safety and Health Administration
1425 W. Pioneer Drive, Suite 230
Irving, TX 75061

Attention: Del Kehbiel

Dear Mr. Kehbiel:

This letter is in reference to the letter dated August 13, 1982, concerning two complaints: one pertaining to our Plastics Department and one pertaining to the Carpenter Shop. After the investigation of the two complaints, the following information is what we found.

Complaint #1 - Plastics Department

We are unable to find any type of solvent that is being used which requires employees to put their hands in it without adequate protection. In fact, the only solvent that we can find is a glue that is used to assemble some of the plastic fittings. We thought maybe there was some type of detergent that might be used that they were getting into, but were unable to determine if anybody in the past year had used any type of detergents. All detergent used in the Plastics Plant is put into the cooling vat automatically without anyone handling it directly. Exposure to the employees would be just residue from the detergent on the fittings after they come out of the water bath.

Ventilation is adequate for the amount of glue we are using in the area. This glue is normally in quart cans with swabs in them and used from the cans and not in open containers. We feel that the personal protective equipment that is issued to the employees is quite adequate for the exposure.

Complaint #2 - Carpenter Shop

Exposure to the vapors exhausting from the paint spraying operation is small. In our Spray Room we have a spray paint booth that has a water curtain that helps eliminate the vapors and mist from going outside. As for as the type of paints being used in the Paint Room, these are

mainly lacquers and latex paints. The only time we have used any oil based paints in the last year is some interior refinishing we have done in one of the office buildings. Normally we do not have any type of oil based paint being sprayed in the Spray Room. Those that we do have do not have a lead content as far as we know.

In this area we are unable to find any evidence of having metal dust which contains lead and zinc in them. There is a possibility of having some fine cast iron dust in the area due to the finishing operations, which is located adjacent to the department but outside the building. We would need more specific information on where the individual says they are getting the lead and zinc dust, to be able to determine if we do have any.

Ventilation in this area seems to be quite adequate for the exposure the employees have. As mentioned above, the Spray Room has an exhauster which has a water curtain on it with the incoming air being filtered, which is adequately designed for the size of the Spray Room and the amount of spraying being done. Other personal protective equipment that is issued is adequate for the protection of the employees for their exposure.

Upon completion of our investigation, we cannot find any evidence to substantiate the basis for the complaints. We feel that we have done as much as we can to eliminate these types of hazards in these areas.

Any additional information you could give us would be very helpful for further investigation. If you require further information, please feel free to contact us.

Sincerely,

TYLER PIPE INDUSTRIES, INC.



Charles Kuenemann
Safety and Security Manager

CK:dlr