

December 16, 1926.

E. W. Webb

Dr. Elizabeth Bricker,
Chief of Hygiene and Sanitation Section,
Department of Labor and Industry,
Harrisburg, Pa.

Re: Companies mixing Ethyl Gasoline.

My dear Dr. Bricker:-

In October I was requested by the President of the National Petroleum Marketers' Association to outline to that association at its annual convention in Atlantic City, our marketing program. This, I attempted to do and I am sending you under separate cover, the October 27th issue of the "National Petroleum News" in which it is contained, beginning on page #17. I am sending it to you in connection with your letter of the 13th wherein you make inquiry as to the interpretation of certain rules as contained in the "Rules and Regulations Governing the Handling of Ethyl Fluid", by Dr. Kehoe.

These rules were prepared last June which was prior to the development by us of the eductor system of mixing in large storage tanks at refineries, which you will observe in my article, was reached after various steps in the business of mixing the Ethyl fluid with the gasoline. The rules were, therefore, promulgated in connection with the then methods of carrying on this mixing and, I feel sure, were not in contemplation of the more improved eductor system.

As indicated in my address, the system which we had developed shortly after the resumption of business last summer was, we thought, an improvement over the old one. It consisted of mixing tank car-lots by means of a specially designed metering pump and although it was, without doubt, a step forward, nevertheless, I feel sure that it involves possible elements of hazard in its operation which do not now obtain with respect to the eductor system.

Every point mixing in Pennsylvania has the eductor system and there are only seven places in the entire country where the metering pump for mixing in tank car-lots is now being used. These will, however, gradually be replaced by the eductor. We think that by next Spring there will not be one of these seven installations in operation and we are not now making any installations other than the eductor and have not since the first installation which was made at the Atlantic Refining Company plant.

Whenever the only system which is being used by any oil company is that of the eductor type (as stated, this should be next Spring) it is more than likely that there will be certain modifications made in Dr. Kehoe's rules but, of course, before any changes are made they will first be submitted for the approval or other consideration of the Surgeon General of the United States Public Health Service.

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Meanwhile, I beg to assure you that we have not intimated in the slightest degree to any of our customers nor to their employees who are engaged in mixing that they are not to fully follow each and every one of these rules. So far as they know, we haven't in mind the slightest modification because we are extremely anxious not to do or say anything which will create any laxity whatsoever on the part of these men. I am very much gratified at the interest which you and your associates have manifested in connection with the manner in which this business is being conducted and the health of the men so employed. We think that your activity and interest will be decidedly beneficial in every way and we want you to fully appreciate that we are and will be at all times only too happy to give you any information we may have which will be helpful in the work in hand and that you can expect and will have our hearty co-operation.

There is one matter in connection with your letter about which we should like to ask further consideration on your part and that is with respect to the furnishing of complete copies of the medical examinations of the mixing men as made by Dr. Kehoe and his associates. Dr. Kehoe advises in regard to these reports that he obtains from this group of men a great deal of information which is confidential and which he notes on his records. He would, in fairness to the men, like to treat this with the same professional privacy as he would be expected to use in the case of private patients. However, he has no objection, nor have we - in fact, to the contrary - to making a report to you as to the particular results of any examinations which have been or are being made of men so employed in Pennsylvania. In other words, the information which will be supplied you, I feel, will amply answer any purposes of your Department. They will fully disclose the result of the physical examinations of the men. Kindly let me know if this will be satisfactory.

Concerning the questions which you ask:-

No. 1 - The use of rubber gloves. This, of course, was for the purpose of providing a material impervious to tetraethyl lead. Cloth gloves in addition to these were considered desirable only as a means of allowing a firm grasp of objects which are to be handled as well as to prevent damage to the rubber gloves in lifting and rolling heavy drums. We should not be inclined to object if the management at any of our points wished to dispose of the cloth gloves provided the proper inspection of the gloves makes certain that the rubber gloves are always in good condition. Needless to say, rubber gloves which are not in good condition, for instance, spongy gloves, etc., may well be worse than no gloves at all. Our experience has been that the cloth gloves are advantageous for the purposes indicated.

No. 2 - The use of double lockers. This is provided in order that the street clothing belonging to the employees need not be hung in the same locker with his work clothes. The idea, of course, was to make certain that there would not be

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any contamination with the clothing which the employee wears home. If the clothing which the employee takes off before beginning the mixing job is hung outside of the locker so that it will not get in contact with the work clothes which are being worn, it is obvious that this may be as satisfactory as if the street clothing were placed in another locker. In this connection, we have attempted to explain to the management at the mixing points the thing which we are trying to accomplish by given rule and have asked for the enforcement of our rules and the carrying out of the purpose for which they have been made rather than to have in every case a letter-perfect adherence to them. Furthermore, the inspections which are carried out both by our inspectors and by our doctors is for purpose, among other things, of checking up and seeing to it that the rules are being carried out in the spirit and for the accomplishment of the purposes intended.

No. 3 - Clean clothing. This statement applies equally well to the rule which has to do with the providing of clean clothing to be worn on every occasion in which mixing is done. The clothing which is provided is white, the material which is being handled is red so that the clothing should show up any stain due to contamination with the fluid. I understand that our doctors have given permission for the wearing of clothing on more than one occasion where the work is being done on the eductor system provided a responsible inspection of the clothing after its use gives assurance that there is no contamination with the fluid. We think that with the development of the improvements to our mixing equipment that this contamination occurs only infrequently and we believe that the most effective means of getting the full co-operation from our customers and the men engaged in this work is for us not to impose any unnecessary burden which is not justified by the facts in connection with the work.

No. 4 - Shoes. We have specifically instructed, orally as well as in writing, each and every one of our customers that the men engaged in mixing should be provided with work shoes and that they be changed after the work of mixing is finished. We consider this an important rule for the reason that the shoes will more likely be contaminated than any other portion of the clothes. We insist, therefore, that special shoes be provided for this work and that they are changed afterward and that they be carefully inspected so that there will be no absorption of lead into the leather of the shoe and subsequently into the foot of the wearer.

I note that the Atlantic Refining Company has developed a system of instructing their service station employees and that you are developing similar methods by which other service station employees are to be instructed. I would esteem it a favor if you would please let us know what this system is so that we may be fully advised.

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I am having a list of the concerns which sell Ethyl Gasoline in Pennsylvania made up for you. It will go forward in a few days. You already have the names of the concerns which engage in the mixing of the fluid with the gasoline but there is a large number of jobbers with whom we have made license agreements for the sale of gasoline after it is mixed with Ethyl fluid in Pennsylvania and it is the latter list which is being gotten up for you.

Very truly yours,

SWW:GMC

P. S. I do not mean to convey the impression that when the eductor system is the only type in operation at any and all points that of necessity Dr. Kehoe will make any changes in his rules and regulations but he might consider it favorable to make certain modifications in that event. However, the development of this type of mixing would, we think, certainly not demand any more rigid rules than are now issued.

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