

14th November, 1936.

Mr. T.R.A. Bevan,
Ethyl Export Corporation,
London.

Medical visits to mixing plants.

Dear Mr. Bevan,

Adverting to the interview you personally had with Prof. Sica of Rome, in respect to the suggestion which was raised with a view to extending the period of medical visits from two to six months, our further study of this question has brought the following conclusions to light.

- a) That in the regulations covering the use of toxic gases no periodical medical visits are prescribed.
- b) There is no provision made in any decree issued to date covering medical visits in connection with the authorization to our Company covering the handling and storage of lead.
- c) No mention of obligatory medical visits is contained in the Ethyl Export Corporation regulations of October 1st, 1929, and which were incorporated in full in the Ministerial Decree of September 8th, 1929, and in a subsequent Decree of November 16th, 1933.
- d) This commitment, however, is derived exclusively from a regulation covered by Art. 1 of a Ministerial Decree of March 20th, 1921, in application of Art. N°6 of the General Regulations covering sanitation and hygiene which was approved with R. Decree-Law of April 14th, 1927, N°530.

Given this premise, therefore, we are now informed by Prof. Sica that he is unable to give us his support on any decision which might reflect the extension factor, as this will have to rest with the authorities who issued the regulation on sanitation and hygiene, namely, the Ministry of Corporations (Inspection Department) and not with the Ministry of the Interior to which Prof. Sica is attached. As you will recall Prof. Sica was quite prepared to support our proposal that the medical visits be extended to four months, while he at the time was under the impression that this work came under the supervision of his Department. His further investigations, however, proved the

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contrary to be the case, as you will have noted from the foregoing. He, however, is quite prepared to support our proposal if his opinion is sought for by the Ministry of Corporations.

For your ready reference we enclose herewith extract of R. Decree of April 14th, 1927, N°530 (General regulations covering hygiene and sanitation), and of Ministerial Decree of March 20th, 1929, (list of the industries which are subject to prescribed periodical medical visits), and would draw your attention to the prescriptions contained in N°14 of the said list.

By virtue of Art. 2 of Ministerial Decree of March 20th, 1929, we would be able to ask for an extension of the periodical visits from two to every four or six months, but many considerations of a general character, however, would dissuade us from taking this step. It is a well known fact that the Board of Health and the Corporative Medical Inspection Department are not working hand in hand, the latter Office being very sensitive to anyone encroaching on their sphere of work, and would be under the impression that the Board of Health was attempting to usurp their activities. In view of this we cannot hold out much hope of having the Board of Health (Ministry of the Interior) support us.

It is evident that the Corporative Medical Inspection Department is becoming much more severe in its inspections than ever, and in this connection would cite the case of our mixing plant in Turin (which is ⁱⁿoperative as yet) where we were called upon to augment the first aid requirements, which requirement falls outside the existing regulations. Were we, therefore, to push the idea of asking for an extension we would have the Corporative Inspection Department buzzing round our plants and committing us to all sorts of absurd medical control which would prove, to say the least, very annoying besides expensive.

This would also raise the case - which lies within the faculty of the Corporative Inspection Department - to allocate a medical supervisor in every locality where we have an Ethyl Mixing Plant (as mentioned in the last part of Art. 2 of Ministerial Decree of March 20th, 1929) which fact in itself would completely upset any plans which you might have in mind to have this work supervised generally by one doctor, who may be chosen to carry out his work under the present plan.

To conclude, therefore, in Prof. Sica's opinion we would be very unwise to push the question of extension as we most certainly would lose the freedom and elasticity in the

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in the medical control work which we at present enjoy, and which falls directly under the supervision of the Ethyl Export Corporation.

In view of these circumstances, therefore, we can only agree with Prof. Sica and fail to see where any useful purpose would be served were we to modify the present arrangements.

Yours very truly,

SOCIETA' ITALO-AMERICANA DEL PETROLIO

Managing Director

CCC/JR
Encl.

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APPROVAL OF GENERAL REGULATIONS COVERING INDUSTRIAL HYGIENE.

(R.D. 14 April 1927, N° 530 - N.809, published in the Official Gazette April 25, 1927 N° 95)

Art. 2) For all industrial or commercial firms whose activities may necessitate the employment of asphyxiant, poisonous or infectious materials, or plants which may produce such products, the owner is committed to previously warn all employees against the dangerous character of such goods, as well as indicate the precautionary measures to be taken, and providing all the necessary means, to prevent accidents.

Art. 3) Raw materials which are not actually being used, the products and residues which may have poisonous or caustic properties, especially if same are in a liquid state, or are easily made volatile or soluble must be kept in leakproof containers with suitable lid or bung. These containers should always bear the word "poison" and the "skull" mark.

First-aid box

Art. 4) The owners of industrial firms employing at least 25 men, must provide that a first-aid box, equipped with all the necessary surgical instruments and pharmaceutical products, be always at hand to render prompt assistance in the case of eventual injuries or sudden illness of personnel.

The Minister for National Economy will establish, with respect to the importance and the nature of the firms, the quantity and kind of surgical instruments and pharmaceutical products that should be kept in the first-aid box.

All other industrial companies affected by the Law covering accidents to personnel while at work, approved by R.D. N° 51 of 3° January, 1904, and relative modifications, are obliged to have on hand packages containing all the necessary ingredients to render first-aid. However, in the case of firms which, for particular reasons, should encounter difficulties with regard to the rendering of prompt first-aid, the Board of Health may also prescribe the use of the first-aid box as mentioned in the first paragraph of the present Article.

First-aid Station

Art. 5) In every industrial plant in which the nature of the work may present risks of explosion, asphyxia, poisoning or infection, the owners are cautioned to keep both the first-aid box and the medicament packages mentioned in the first and second paragraph of Art. 4.

When the number of workers employed is more than five it is necessary to also keep a conveniently aired and illuminated room, heated in the cold season, equipped with the following:

- a) surgical and pharmaceutical ingredients as per paragraph 1 of Art. 4.
- b) a bed with mattress and pillow covered with waterproof fabric and having at least two woollen blankets;
- c) a stretcher for the eventual transportation of an individual. This may substitute the bed when fitted with mattress and pillow;
- d) Water for drinking and cleansing purposes.

Doctor of the Plant

Art. 6) In industrial works in which toxic or infectious substances are used or produced, which products will be indicated in a list to be compiled by the Minister for National Economy together with the Ministry of the Interior, after having heard the opinion of the Board of Health, all workmen will have to be examined by a competent doctor:

- a) Prior to taking up such work, with the view of establishing whether the individual is physically capable of resisting the influence and deleterious effects of the chemical agents to which they will be exposed.
- b) successively, at established intervals, to be indicated in the aforementioned list, in order to check the state of health of the personnel.

Art. 7) In plants contemplated under Art. 2, 4 and 5 a bill should be posted on a wall in a visible situation on which should appear the name, domicile and telephone number of the doctor, or else the address of the nearest public hospital.

In the firms contemplated by the first paragraph of Art. 4 and 5, a nurse or, where this is not possible, a person having a practical knowledge of nursing, should be assigned to look after and maintain in first class condition the surgical instruments and pharmaceutical ingredients, as well as render first-aid while waiting for the arrival of the doctor.

Approval of list reflecting industrial plants in which toxic or infectious substances are used or produced, with respect to compulsory ~~examinations~~ initial and periodical medical examinations of personnel as prescribed by Art. 6 of the General Regulations of April 14, 1927, N°530, covering Industrial Hygiene.

The Minister for National Economy, together with the Minister for the Interior, in view of Art. 6 of the General Regulations covering industrial hygiene approved by R.Decree of April 14, 1927, N°530,

DECREES:

Art. 1) In view of Art. 6 of the General Regulations covering industrial hygiene, approved by R.Decree of 14th April, 1927, N°530, the present approves the following list of industrial in which toxic or infectious substances are used or produced, and in which the personnel is subject to initial and periodical medical examinations:

List of Industries

N°	Cause of risk	Kind of work or category of labour	Initial medical examination	Successive periodical examinations
3	Lead	 c)men employed in plants manufacturing lead compounds	yes	Every two months
13	Benzine, benzol, toluol, xilol	Industrial use of any substance admixed with benzine, benzol, toluol or xilol.	yes	Medical examination in event of individual suspecting or showing signs of poisoning.
14	Benzine containing organic or metallic compounds or other toxic substances	Men working on: a)the preparation of blends b)the cleaning and overhauling of motors in which said benzine has been employed.	yes	every six months " " "

Art. 2) The Board of Health may authorize the owner of industrial plants to effect the periodical medical examinations at longer intervals than those prescribed in the above list, (but in no case may the interval be twice the period ~~prescribed~~ indicated above,) whenever the means provided by the company are such as will notably diminish the danger from poisoning or infection, and always if the owner is able to ensure the immediate intervention of the doctor in case of accident.