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to Mr. Benedict
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ETHYL GASOLINE CORPORATION

**CHRYSLER BUILDING
405 LEXINGTON AVENUE**

**SAFETY COMMITTEE
O. B. LEWIS
CHAIRMAN**

NEW YORK

November 2, 1936

Mr. C. C. Benedict
Socony Vacuum Oil Company
26 Broadway, New York City.

Dear Sir:

We are writing this letter in accordance with your request that we review the discussion which we had in your office, pointing out the various arguments used to support our new plan of placing a metal tag on tanks which have been used for blending concentrated fluid.

It has come to our attention through the past several years that despite the efforts of oil companies, several cases of sickness and even death have resulted in connection with the cleaning of tanks. The history of these tanks indicates that concentrated fluid either through a regular blending plant or through some past "spiking" operation had been used. We have no evidence at this time of any regular leaded storage tank having given any trouble as the result of lead being used in the gasoline.

This would seem to indicate that as an immediate program, we should investigate carefully all tanks where concentrated fluid had been used. Generally speaking, the Safety Departments of oil companies are not familiar with this type of hazard, and we believe it safe to say that they have not realized the full extent of this danger.

Possibly as a coincidence, the record shows that all poisonings have occurred within companies of the so-called "Standard" group. These companies, we feel, are those most likely to have adequate Safety Departments. Possibly some lesser exposures have been encountered by the smaller companies, but nothing of a serious nature has been reported to us. So it would appear that some additional precaution should be taken even by well managed companies in the hope that future accidents may be avoided.

We have no objection to a company tagging all its leaded gasoline storage tanks if it so desires but we feel in view of our past experience that the particular tanks mentioned should definitely

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contain a sign as described to you. If an individual is careless after having first had your safety engineers' instructions, or if he ignores the necessity for such instructions after having been compelled to see the warning sign on the tank, your company would seem to have made every effort to protect him, and could not be charged with negligence. On the other hand your failure to comply with what is to be made general practice in relation to blending tanks may place you in an unfavorable position if difficulties should occur.

We quite agree with your argument that dependence upon signs is a rather poor substitute for adequate safety measures. We believe these should be used on dangerous tanks, however, until a complete study of the matter can be made as a basis for final action. I am sure our Medical Department would agree to the removal of the warning tags, if the study indicates that such tags are unnecessary or impractical.

In addition to the metal signs, one of which we are including, we suggest that placards be placed in the office of all refineries, terminals, etc., where blended or spiked tanks may be found. Two of these are enclosed, one with our signature, the Ethyl Gasoline Corporation, and one blank, either one of which may be used.

Attached hereto is our incomplete list of points where emergency blends were made for your company. We believe there were several hundred points in all and we understand from our discussion the other day that you are going to investigate this matter that we may have proper information on those tanks which may offer some unusual hazard.

Very truly yours,

Edward P. H. L. L. L.

F:GCL
Enclosure

cc: Dr. R.A. Kehoe
cc: Mr. R.C. Murphy

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