

January 17, 1936

Mr. Alan C. Tully
Ethyl Export Corporation
368 Collins Street
Melbourne, C. 1
Australia

Dear Mr. Tully:-

I have previously sent you notations from time to time concerning the potential hazards associated with the cleaning of tanks which have been used for the blending and storage of gasoline. We are making a very detailed study of this problem in the United States and as that study has gone on and as things have developed, we have come to the conclusion that the methods which we have devised for cleaning tanks are satisfactory from the point of view of safety if they are actually applied in this work. It seems clear to me that we do not know as much about how this matter is handled in various parts of the world as we should know. For that reason I am sending you a confidential memorandum which has at least the virtue of displaying my general point of view as to the difficulties of handling this type of work. This material is for your information and I suggest that you do not distribute it widely since it is not well to raise generally the questions which are at issue. It is wise, I believe, for us to face this situation as well as we can and to collect the information which is obtainable. Accordingly I am attaching to the memorandum a questionnaire as an example of the type of information which I think you and your associates should begin to collect for your information as well as for ours. I do not mean to say that you should send out this questionnaire in its present form to customer companies. Rather I think you should consider the extent to which you can ask for and obtain this type of information. In any case it seems to me you should begin collecting such information as it seems feasible to get without undue anxiety on the part of the executives with whom you have dealings. I should like to have you consider this question seriously and let me have your opinions as to how best to go about this and as to what detailed information you believe can be obtained. It seems rather

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obvious that we can not set up a type of supervision all over Europe which is comparable to that which we are trying to achieve in the United States. It is quite possible that such a regime would be undesirable even if it could be achieved. On the other hand we should certainly not ignore the existence of this danger and we should know as well as we can how best to handle it, and whether or not the means at present employed are reasonably effective.

I am also sending you herewith a copy of the present instructions which are being issued from this office in the book of regulations. You may have seen these instructions before, but I wish to call your attention to the fact that there are significant changes in these regulations as compared to those which appear in your present book of regulations. The most significant of these changes have to do with the use of air-line hose masks exclusively, as well as the use of acid-proof rubber gloves in cleaning operations. I have some hesitation in demanding that Rule B be extended into the entire foreign field of operations. I recognize that in some parts of the world these masks will not be available, and if they are not and can not be obtained, the tendency will be not to use any masks at all, whereas the canister masks will certainly be better than nothing. I invite your suggestions on this point.

I trust that this letter and these enclosures will make my point of view clear in the matter, and I hope to hear from you shortly on this subject.

Sincerely yours,

RAK:is

Robert A. Kehoe, A.D.

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