

GENERAL TALK ON SAFETY POLICIES

Regional Meetings of Ethyl Corporation Field Staff

I. Background

First full development of policy in relation to tank-cleaning in Meetings of this general type in 1940

1. Situation of that time - poisonings, fatalities, anxiety of Corporation and of customers companies, especially those whose employees had been involved

2. Statement of Principles

Existence of serious hazard - nature - method of control

Responsibility of Ethyl to (a) educate and (b) control

3. Obliterate hazard by concentrated attack of all or nearly all field personnel

- a. Interviews with executives and authority - to promote full understanding
- b. Issuance of instructions, placards, signs on tanks
- c. Presence at site of tank-cleaning operations

4. Organization of program (various procedures tried - pattern established finally,

- a. Advisory relationship of Medical Department to

Top management

Sales Department executives

Safety management

} as the center of
primary information
based upon

- (1) Medical responsibility for prevention of illness
for care of ill,

for medico-legal activities.

- (2) Research activities in medical and toxicologic matters

- b. Authority in line organization

Sales Department Executives

- (1) Safety Manager - Direction and coordination

Transmission of advice

(2) Field Executives

(3) Field Staff

5. Results of Program

II. Present need for Restatement and Clarification of Policy

1. Factors responsible for this need

- a. Lapse of years since formal meetings dealing primarily with safety
- b. Dislocations of war - modified tank-cleaning program and question of reverting to earlier program, continue modification or change still further
- c. Changes in top management
- d. Economic and organizational stresses associated with competition
- e. Reorganization of field activities - decentralization - customer account policy

2. Effects of foregoing factors

- a. Attention concentrated on minor rather than primary issues of policy - on details rather than principles of day's work
- b. The safety of personnel engaged in hazardous jobs as being jeopardized over
 - (1) fear of inconveniences to customers and loss of their good will and business
 - (2) uncertainty as to where top management of Ethyl is putting its emphasis - on economy of operating or on safety of personnel

3. New facts and factors which argue in favor of reexamination of position

- a. Field experience which has proved our operations to be faulty - Record not wholly good even when tank cleaning procedure has been observed by our people
- b. Experience with leaded gasoline during war
- c. Experiences with TEL and unorthodox practices in areas in which hygienic control is non-existent or inadequate - Russia, Germany, Italy - earlier representations of this in U.S.A., accidents to children and adults who drank "Ethyl" fluid, stored in unauthorized and unsupervised places, Bootleg manufacturing plants

Personal appeal for honest acceptance of criticisms not intended to be personal but merely illustrative.

- d. New technical developments - Vitane
- e. New or old problems now under investigation
 - (1) Hazards of cleaning small tanks
Field and clinical investigation
 - (2) Hazards of buried sludge
 - (3) Hazards of aeronautical origin - Airports
and plants
 - (4) Lead contamination of air of cities

III. Authority for Restatement of Fundamental Policy

1. Policies, procedure and organization reexamined by New Management, as have all other policies and operations
 - a. What are they and what do they cost?
 - b. Are they necessary now or can they be reduced or eliminated?
 - c. Are the hazards all understood by customer personnel and can advice and educational efforts be substituted for the work now done directly by personnel of Ethyl Corporation
2. The fundamental principles of the original policy, based on experience - not on theory or empire building - have been reaffirmed, as follows:
 - a. Ethyl Corporation is engaged as its primary activity in the manufacture and sale of a useful but highly dangerous product;
 - b. The risks to human life and health entailed in the distribution and use of this product are such as to constitute the chief threat to the continued existence of the business of Ethyl Corporation, the economic threat of competition being slight by comparison;
 - c. The Corporation must maintain in its own hands, not in those of Governmental agencies or others, the control of its own activities, in accordance with its pledge to the United States Public Health Service;
 - d. The responsibility for the maintenance of public safety necessitates research and alertness to the appearance of new hazards or the recrudescence of old;
 - e. It entails the ability and authority to meet conditions as they arise and to adapt hygienic practice accordingly, uninhibited by self-inflicted obstacles of organization, and unrestricted by formal legislation imposed because of default on the part of the Corporation, in its responsibility to the community;

- f. There are privileges and also moral, social and economic responsibilities in a system of free enterprise. The latter is free to contribute to the welfare and prosperity of the community. It may not impose undue hazard nor inflict obvious injury upon the community without inviting regulatory mechanisms;
- g. The Medical Department, in its advisory relationship to the Corporation, must explore and find the means of exercising its responsibility for the public health in matters related to the products made and sold by the Corporation. So long as it can do so successfully and in good faith, it will do so to the best of its ability as a professional duty, and also as an obligation to federal and local health authorities. When it cannot do so, it will not only relinquish its task, but will inform the authorities of the essential facts.

- 3. These principles have been approved by President Shea and the New York Staff and confirmed by Board of Directors of Corporation

IV. Concluding Remarks

The safety of personnel subjected to various hazards which arise from the sale and distribution of "Ethyl" antiknock compound is in danger of being jeopardized by uncertainties on the part of sales and safety staff of the Corporation as to where the management and stockholders of the Corporation are putting their emphasis, whether on maintaining the maximum degree of safety, or on the maximum degree of economy in the operations relating to safety. The answer has been given. There can be no business operations, in any enduring sense, unless the safety of personnel is secured by every reasonable effort on the part of the Corporation and its sales organization.

A further question relates to fears which have been entertained and also expressed as to the loss of commercial advantage to a competitor, in inflicting regulation and inconvenience upon customers of the Corporation in the interests of safety. This fear need not be taken seriously if an effective and honest job is done. Representatives of customers may express irritation, at times, because of some

inconvenience to which they may be compelled to suffer for their own safety, and also they may find some amusement in the problems which they can see (and augment) as between the competitors. Nevertheless, they must not be dealt with in matters of safety so as to seek their immediate favor but rather to advance their ultimate advantage, as far as the latter can be foreseen. The only good advice is wise, not self-seeking, advice. The safety representatives of Ethyl Corporation have achieved an enviable position by their expertness and honesty. They have been accepted at their face value by the petroleum industry. They will keep that position, not by cunning or by stealth, but by knowing their business and by maintaining their record of ability and honesty over the long pull. They have the position of good will that is being sought by a competitor. They can lose it only by their failure to employ the tactics by which they gained their present position. Their only concern should be to be right in their judgments and fair in their dealings, seeking the ultimate good of the customer, and not his immediate favor.