

May 6, 1960

Mr. R. K. Scales
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Dear Dick:

Since talking with you on the telephone in Rochester last week, some further prospect of discussions that would clarify our course in connection with the introduction of TML into foreign countries has led me to delay my reply to your letter of February 23rd. In replying to you it seems wise to communicate my views to Messrs. Turner and Perdue by means of copies of this letter.

We are in much the same situation, I believe, as we were from 1928 on, when the use of TEL abroad had to be dealt with. The problem is complicated by the competitive situation in that Ethyl, du Pont, Associated Ethyl and three Italian manufacturers and distributors of TEL (and potentially TML) are involved in the foreign market. Moreover, the aspiration of groups or governmental agencies in several countries to manufacture TEL (and also TML if this seems to them to be advantageous) within their own country (for the domestic and, in some instances, the export market) is an important consideration in dealing with governmental agencies.

In any case, the introduction of TML into foreign use will be of interest to oil companies whose representatives could, perhaps deal with the relevant governmental authorities from the aspect of clearing the way for commercial activities involving TML. I view this procedure with very definite concern for several reasons. First, the representatives of the oil companies do not understand the problem and can not present it properly from the hygienic viewpoint. Second, the commercial or legalistic approach to this may well result in suspicion or resentment on the part of hygienic authorities, and the use of lead in any form might be brought into question again. Third, in its primary sense, this is a problem which is vital to the lead manufacturing industry, but of somewhat incidental concern to the petroleum industry, lead being only one of many products.

The preparation of the way, therefore, should be undertaken by the tetraethyl lead industry with the assistance of the appropriate oil company. That is, the spokesmen for the TEL industry should be its own representative, with such advice and help from the petroleum companies as may be necessary for the purpose of approaching the proper person or agency in the specific country. This is the manner in which this was done

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originally, and in my view, with certain deviations, this is the way it should be done now. As to the deviations, there will be no problem in England, but due consideration for our previous relationships, and the uses of courtesy, call for a communication to the proper governmental agency on the part of the TEL industry. This of course could be best handled by Ray Bevan, speaking for Associated Ethyl, can handle the matter in England or in a number of other countries for the entire TEL industry is a problem to which I have no answer.

Of one thing I am reasonably sure, to my considerable concern; if this matter is neglected, or if it is dealt with independently by the TEL manufacturing companies and the oil companies, on the basis of timing and the greatest competitive advantage to the group concerned, we shall find ourselves in trouble.

Now to answer your specific questions, we do not know the details of the regulations in various countries. In the main there are none, but several countries (France, for example) have regulations provided by specific agencies and subject to change by such agencies which limit the concentration of TEL in gasoline. These would have to be changed, I believe, to include TML. Some countries (Venezuela is the only one I am sure about) have detailed statutory regulations and, I believe, certain administrative regulations as well. In Switzerland we would certainly have to inform the government officials fully for they are under attack from certain sources even now.

In certain of these countries I could find someone in medical or hygienic circles to represent us (if we in Ethyl Corporation could act in accordance with our own judgment as we were able to do formerly). I do not look forward with delight to the prospect that lies before me in consequence of my remarks above, but I am put to the necessity of saying what I think. I will be glad to consider further how we may go about this.

Sincerely,

Robert A. Kehoe, M. D.

RAK:ss

cc: Mr. Bynum Turner
Mr. Wm. R. Perdue, Jr.

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