

THE ASSOCIATED ETHYL COMPANY LIMITED

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OUR REF. S/7

YOUR REF.

13th May 1946

Dr. R.A. Kehoe,
The Kettering Laboratory,
College of Medicine,
University of Cincinnati,
OHIO.

Dear Bob,

I have delayed replying to your most helpful letter of March 25th on the subject of the tank cleaning regulations until I had had an opportunity of some further discussions with our oil company friends here.

The general feeling is that a paragraph setting out the source and nature of the hazard is definitely helpful. It is considered that this information serves not only to explain, but to emphasise, the extent of the hazard. In the redraft of these regulations dated May 9th, copy of which is enclosed herewith, the paragraph dealing with the source and nature of the hazard has, therefore, been retained, and it would be greatly appreciated if you would reword it in such manner as you see fit.

It is considered that the use of a free airline mask should be permitted under our regulations for tanks not in excess of 50 tons capacity. In view of your remarks the original note to this effect has, therefore, been inserted.

In Sections 3, 4 and 5 reference is now made to the handling and disposal of sludge, since it is considered desirable that clear cut instructions be given in this connection under each separate heading where the problem of sludge is likely to be encountered.

A major point arises in connection with rail tank wagons. Apparently railway regulations in this country require that all gasoline rail tank wagons

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shall be emptied by top suction, whereas I believe in the United States the established practice is to use bottom outlets. Tests, undertaken by the Petroleum Board, have established the fact that deposits in the bottom of rail tank wagons contain both organic and inorganic lead. In view of this fact I think you will agree that it is desirable, for the purpose of these regulations, to treat rail tank wagons exactly as if they were storage and mixing tanks.

The same problem does not arise with road tank wagons which are invariably emptied through bottom outlets.

In the two sections 6 and 7 dealing with road tank wagons and ocean tankers respectively, it has been suggested that the opening sentence explain why the regulations required under these headings are different from those to be followed in the case of storage, mixing tanks, rail tank wagons etc. The wording used in the attached draft in this connection may not meet with your full approval. In this event would you be kind enough to suggest alternative wording.

Might I trouble you once more to express your views on our latest draft of the tank cleaning regulations, which apart from the alternatives referred to above differ little from the earlier draft sent you with my of March 18th.

I am sorry to keep bothering you on this matter, but I have been most anxious, in the wording of these tank cleaning regulations, to carry the oil companies with us, and our many discussions with them have, I think, resulted in a better appreciation of the problem by all concerned.

With kind regards.

Sincerely yours,

T.R.A. Bevan

T.R.A. BEVAN

Enc.

*Copy of regulations returned to
Bevan with pencil notes. Final
copy to come later*