

December 15, 1942

AIR MAIL

Mr. C. L. Risso-Gill,
The Associated Ethyl Company Limited,
Paseo Colon, 285,
Buenos Aires,
Argentina.

Dear Charlie:

I hope you will find it in your heart to forgive me for the long delay in replying to your letter. The fact is I was undecided as to how to answer your letter when it first came, and with the urgency of many matters that continued to pour in on me daily, I pushed your letter back, until I should have an opportunity to think out what we should do. My final conclusion is probably not a very satisfactory one, but it is the best solution of the problem that I can think of at present.

The introduction of specific regulations for the handling of one item of work in a refinery or into such a complicated set of operations as that which occurs on board a tank ship, is quite awkward, since in attempting to do this, one is likely to run afoul of other types of regulations. Because of this fact, we introduced our regulations for tank cleaning in a very simple form so as not to conflict with regulations which had to do with prevention of fires and the avoidance of other hazards with which we were not primarily concerned. The result was that finally the instructions for tank cleaning issued by the A. P. I. were completely rewritten to include the additional precautions required to avoid danger from lead. The ideal procedure would be to do the same thing with reference to the cleaning operations on tank ships. I wonder, therefore, if it would not be possible to find out what regulations or instructions are in effect on board ships of various distributing companies. With such information at hand, we could fit our requirements into those already existing. To do the thing otherwise would probably mean that our instructions would either be ignored or would be resented as unduly burdensome.

This is not a new idea in connection with tank ships, but the fact is that we have had considerable difficulty in finding out just how cleaning is handled by various fleets. Some of the

Mr. C. L. Risso-Gill - (2) - December 15, 1942

companies would give one to believe that they never sent men into the compartments for the purpose of cleaning them out. Others have been very vague on the subject. In fact, at every point, we have met somewhat the same difficulty with which you are presented in Curacao. I think, therefore, we shall have to take up this entire problem on a rather comprehensive scale, and try to get to the bottom of it. Perhaps your suggestion that the Master of the ship be made responsible for the whole affair is the proper one. I shall look into the matter further and will see if we can not effect some means of obtaining comprehensive information. Any facts which you care to set down and which you can obtain from people with whom you deal will be helpful, and any suggestions which you may offer will be gratefully received. The more specific you are in your suggestions, the better I shall be pleased. What I dislike so much about this situation is that we do not know precisely how great the dangers are, since we have never been able to obtain a comprehensive picture of what happens in the case of an individual tanker, and how variable the matter is from one ship or one fleet to the other. It might be argued that this is not our responsibility, and I presume it is not. On the other hand, anything we can do to make safe the series of operations that are concerned with the handling of leaded gasoline, will be an advantage to ourselves, and a great advantage to the industry as a whole.

I trust this letter will reach you before Christmas. This time I hope you will be able to spend Christmas at home, and I take this means of sending you and yours our very best wishes for a Happy Christmas and an increasingly satisfactory New Year.

Sincerely yours,

Robert A. Kehoe, M. D.

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