

April 12, 1935.

Memorandum to Mr. Webb —

Concerning Tetraethyl Lead Manufacturing Plant in Germany.

Purely commercial considerations make it imperative that there should be no recurrence of episodes of lead poisoning in the manufacturing end of the industry. The two points of vital importance in the prevention of difficulties from this source are, (1) that the information on equipment and methods of manufacture which has been acquired by years of experience at the duPont Dye Works Plant shall not be permitted to be inoperative and (2) that the details of hygienic control which have been built up through experiment and experience shall not be neglected or ignored at any point. It is conceivable that the manufacturing experience of the German Corporation which is concerned in the contemplated negotiations will have given them reason to believe that they can cope satisfactorily with the problems associated with the manufacture of tetraethyl lead. On the other hand, there is the certain evidence that many years of careful study and the expenditure of large sums of money were required before the duPont Company was enabled to manufacture tetraethyl lead with safety. Even now, despite all efforts and all the measures of control, there is one group of workmen in the Manufacturing Plant whose present lead exposure and absorption is of such magnitude as to convince me that additional precautionary steps are required to provide that degree of safety which is desirable. Accordingly, therefore, the writer is of the opinion that the interests of the Ethyl Gasoline Corporation would be jeopardized by entrusting to any other corporation the responsibility for the choice of manufacturing equipment and procedures and for the adoption of methods of hygienic control. The methods and measures which

KE 0022983

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4/12/35.

have proven themselves should be transplanted to the new manufacturing site and should be put into actual operation by those persons in the duPont and Ethyl Gasoline Corporation organizations who have been responsible for their development and use. Any other course is almost certain to result in danger, delay and unjustifiable expense and may be accompanied by tragic consequences. Therefore, the negotiations leading up to an agreement or partnership should, in my opinion, be carried on so as to promote and maintain the dominance of the judgement of the officials of the Ethyl Gasoline Corporation in all matters relating to construction, operation and hygienic control of the new plant, at least through a preliminary trial period.

Specifically, this recommendation signifies that the details of plant construction should be made subject to the approval of representatives of the Ethyl Gasoline Corporation. Such representatives should inaugurate and control the trial period of operation so as to put into effect the safety measures which have been worked out and recorded for each step of the process. Moreover, the extent and nature of the medical control of the plant should be in accord with the requirements of the Medical Department of the Ethyl Gasoline Corporation. Doubtless these points will have to be couched in somewhat less direct language than is employed herein but the essential purpose and intent should be preserved by the terms of the agreement regardless of the delicacy of the phraseology.

The only person who knows the details of the manufacturing and safety procedures is Mr. J. L. Stecher of the E. I. duPont deNemours Company. He should be permitted by the duPont organization to devote whatever time is necessary to the promotion and development of this project. He should be in charge

KE 0022984

4/12/35.

of the first operations of the new plant and should remain on the job until the operations proceed satisfactorily. Perhaps he can delegate some of his responsibility to one of his assistants.

The medical arrangements should be developed on the ground either by myself or Dr. Machle and certain details of the construction of the plant which in our opinion can be beneficially changed, should be worked out through the cooperative efforts of Mr. Stecher and either myself or Dr. Machle.

The repeated reference to Mr. Stecher does not imply that the counsel of Mr. Schaefer is to be ignored but in some degree he must be regarded in the capacity of a critical student of the entire process of plant development in the case of this first new manufacturing plant.

Attached hereto is a memorandum in which certain details which will influence the construction and the cost of operation of the plant are pointed out, mainly for the information of Mr. Schaefer and Mr. Stecher.

Respectfully submitted -

Director of Medical Department

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