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22nd February, 1938.

Dr. R.A. Kehoe,
Dept. of Physiology,
College of Medicine,
University of Cincinnati,
Cincinnati,
Ohio, U.S.A.

Dear Dr. Kehoe,

In view of the fact that we are at the present time rather busily engaged in running a sales campaign in this country, I am afraid that Mr. Fossett has not had as much time as he would have liked to take up with our friends the Shell, Standard and Anglo-Iranian, the points mentioned in your letter of January 17th, relative to the cleaning of storage tanks. He has, however, discussed the matter with both Standard and Shell and hopes to have a similar talk with the Anglo-Iranian in the near future.

I am enclosing herewith copy of the printed regulations which we sent out last year relative to the cleaning of storage tanks. These, I believe, are substantially similar to those you are recommending at the present time, with the possible exception of 2, under which we have permitted the use of canister masks where air-line masks are not available.

In the case of the Anglo-Iranian, they assured us some time ago that our regulations are substantially similar to their own and that they foresaw no difficulty in having them strictly adhered to. The Jersey office here are also of the same opinion. We may have rather more difficulty with the Shell since they have a set routine for rather frequent tank cleaning and our regulations undoubtedly will cause them some inconvenience and additional expense.

I do not believe it would be at all wise to send out the questionnaire enclosed with your letter since by doing so we might create the impression that the regulations we have issued are not final and definite. The questionnaire asks whether some of our regulations are being carried out, and this I feel is not a good principle since I believe we must at least assume that the regulations are being carried out and check this by personal visits to the plants.

It seems to me that we could collect the information that is called for in the questionnaire through the visits of our representatives to the various mixing plants in our territory. This is, I believe, also your idea.

KE 0007088

r. R.A. Kehoe.

DATE 22nd February, 1939.

I think it quite possible that we may be fortunate enough to avoid some of the difficulties over tank cleaning that have been experienced in the States since to the best of my knowledge the majority of the oil companies over here are very strict about supervising this operation and ensuring that their workmen adhere strictly to the regulations which they themselves have issued for the cleaning of tanks (regardless of whether lead has been used). I realise full well that this belief in itself is not sufficient for our purpose and that it is necessary to develop the matter further. We have, however, for the past year during the course of our routine inspections, impressed on the managers of each plant the necessity of observing strictly the regulations issued by us for tank cleaning and will continue to follow this practice on future visits and also attempt to check whether any irregularities have occurred, although this, as you will realise, is a somewhat difficult matter.

For this country we have instituted a practice which I think is a fairly sound one; namely we have had made a number of metal plates bearing the words

"ETHYL PETROL

Observe special cleaning regulations."

and the oil companies have fixed these plates to their tanks which have been used for blending or storing leaded gasoline.

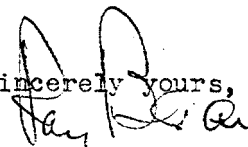
We might develop this system for other countries but I am a little dubious about one or two of them. For instance, the labour situation in France today is such that a notice of this sort on storage tanks would be taken by the workmen as a good excuse for demanding a higher rate of pay for tank cleaning. They have already demanded and obtained a higher rate of pay for blending, using our regulations as proof of the danger involved to the workmen concerned. They have also demanded additional pay for the handling and moving of drums of Fluid. It is necessary therefore that we be rather careful how we approach this matter of tank cleaning in France.

Since you are coming over here on a visit in the Spring I would like to suggest that before taking any further action in this matter we await your arrival and then discuss this whole question in detail and agree a course of procedure to be adopted.

I am very much looking forward to your visit, since, quite apart from the pleasure of seeing you again, there are a number of points we should like to have the opportunity of discussing with you. Dodds is particularly anxious to know when you propose coming over and perhaps you would be kind enough to let us know at your early convenience, so that we can tell him before he leaves for Australia on the 16th March.

With kind regards,

Sincerely yours,



cc. Mr. Champlin.

KE 0007089