

ETHYL GASOLINE CORPORATION

CHRYSLER BUILDING
135 EAST 42ND STREET

NEW YORK January 28, 1932.

Dr. Robert A. Kehoe,
College of Medicine,
Eden & Bethesda Aves.,
Cincinnati, Ohio.

Dear Dr. Kehoe:

I have your letter of the 26th relative to mixing equipment of the Texas Company at Bayonne, Lockport, Providence, and Port Arthur. I think that you have taken a very considerate viewpoint so far as the Texas Company is concerned and that we should not let the matter run along as it is at present for a period beyond one year and every effort should be made by us in this office to convince them of the desirability of a very much earlier adequate and satisfactory correction. I am going to personally discuss the matter with Dr. Gray and shall, I can assure you, do whatever I reasonably can to get him to advance the time as much as may be practicable.

The last paragraph of your letter is a classic, and enclosed is a copy of a memorandum I am writing on the subject.

With my very best wishes, I am,

Very truly yours,

Славко

A:H

KE 0001185

January 28, 1952.

MEMORANDUM

Messrs. Mittnacht
Taylor
Walter

Dear Sirs:

I have just received a letter from Dr. Kehoe in reference to a matter of inadequate mixing equipment at several places concerning which he has taken a very reasonable attitude, which I will discuss with you at our next meeting.

There is a paragraph in Dr. Kehoe's letter which impresses me as squarely "hitting the nail on the head", and he expresses it in such a concise, clear-cut manner that I wish to quote it; and I should think it was worthwhile passing along to those in our organization who have anything to do with mixing equipment or the health hazards associated with our business.

"And may I say without seeming to be too critical, that I feel it entirely necessary to use the greatest caution in permitting situations of this sort to arise. It is only with the greatest difficulty, and frequently associated with bad feeling, that we are able to change equipments which have once been installed with our tentative approval. I am convinced that the price of safety in this occupation is the continual maintenance of a certain minimal standard in equipment. There is a very strong tendency to associate careful work with good equipment, and slipshod work with bad equipment. This we must guard against at every point."

Very truly yours,

E. W. Webb

A:H

KE 0001186

January 26, 1932

Mr. E. W. Webb,
Ethyl Gasoline Corp.,
Chrysler Bldg.,
New York, N. Y.

Dear Mr. Webb:

Mr. Siebenthaler has referred to a discussion which he had in your office some days ago on the subject of the present manner of dealing with the somewhat inadequate mixing equipment of the Texas Company at Bayonne, Providence, Lockport, and Port Arthur. It is my understanding that I should communicate my feeling about this to you, in order that you may take the matter further to Dr. G. W. Gray of the Texas Company.

I feel that nothing less can be expected of the Texas Company than the fulfillment of the minimal requirements as set forth in the specifications for mixing equipment. This requires the use of a concrete platform at box car height, of sufficient size to take care of the storage of full and empty drums together with adequate space for mixing, the same to be connected with suitable drains so that the storage and mixing area may be entirely flushed if spillage of fluid occurs. This requires also the use of a roof over the storage space to prevent the effect of direct sunlight on the drums. I shall state my reasons for this feeling in a subsequent paragraph. However, I hasten to say that in my opinion it would be much better to permit the Texas Company to operate their present equipment in its present form rather than to waste any further sums of money in modifications of equipment which afterward will be found to be entirely unsatisfactory from the point of view of our specifications. In other words, I should prefer to permit them with their present care, to operate their present bad equipment, than to spend money which would be wasted in making it only a little less bad. As I understand it, the reason for permitting them to build their present equipment resided in the possibility that in a short time they might wish to use tank car equipment. This possibility does not seem to be great at present. Within six months to a year it should be possible to determine definitely whether such equipment is likely to be needed at any time in the reasonably near future. If and when it is established that they will not need such equipment, they should be required to build equipments which are entirely satisfactory from our point of view.

KE 0001187

I recognize the need for caution in the matter of expenditures at the present time. I recognize further that the Texas Company officials at the different refineries have handled the matter intelligently, and have taken every possible precaution. Therefore I should be entirely willing to permit them to go ahead as at present for a definite specified time, after which they must conform to the standard specifications. This permits them to save money at present, and has the advantage of giving them no illusions about the absolute necessity of operating on the same basis as other refineries.

There are several points concerned in my opinion as above. Certain very definite hazards are involved in the plants as now constituted, thus the spillage of Fluid at a point where the drums are now stored (that is, on wooden skids on the ground) would so contaminate the ground as to make it difficult to get rid of spilled lead. Even on a flat platform of sufficient size for the storage of drums this condition is not complete obviated. The handling of drums from cars is a more or less dangerous procedure involving the likelihood of physical injury as well as some danger of bursting drums if any of them should fall or otherwise become unmanageable. The absence of a roof constitutes a very definite danger in that the contents of drums become heated, and when the bung is removed there is a very considerable escape of gases under pressure. All of these things have been considered before, and I believe must be taken seriously. Difficulties over them may not occur at once, but are distinctly likely to occur and should be avoided to every possible extent. The fact that matters in the main are handled very well indeed by the Texas Company, does not entirely solve the problem. Their present careful personnel may be replaced by less careful persons, and even if this were not the case we should find it very difficult to explain why we permit irregularities in the hands of the Texas Company which we will in no wise permit in the hands of other people. It is partly for this latter reason that I do not feel that we are in position to authorize the expenditure of further money on their present poor equipment. If the question is now raised as to why such equipment has been permitted by us, it could be answered by stating the truth to the effect that it is a temporary condition due to the uncertainty as to the type of ultimate equipment which will be required. If we permitted the changes which do not fulfill the specifications, we would be to some extent fastening this equipment upon the Texas people, without having any answer to those who may object to the lack of uniformity of our equipment.

Thus for all of these reasons I would suggest that Dr. Gray of the Texas Company be advised that we will permit the present equipment to operate as it is without any further expense to them for a period not in excess of one year. I should prefer to say six months, but I wish to be as reasonable as possible. After this time, he should understand that some decision must be made as to the type of equipment to be employed, and that the necessary changes must be made at once to bring the equipments up to our present specifications.

And may I say without seeming to be too critical, that I feel it entirely necessary to use the greatest caution in permitting situations of this sort to arise. It is only with the greatest difficulty, and frequently associated with bad feeling, that we are able to change equipments which have once been installed with our tentative approval. I am convinced that the price of safety in this occupation is the continual maintenance of a certain minimal standard in equipment. There is a very strong tendency to associate careful work with good equipment, and slipshod work with bad equipment. This we must guard against at every point.

With kindest personal regards.

Faithfully yours,

RAK:EJT