

ETHYL GASOLINE CORPORATION

MANUFACTURING DEPARTMENT

INTER-OFFICE
CORRESPONDENCE

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January 22, 1935

Dr. Robert A. Kehoe,

Dear Dr. Kehoe:

I acknowledge with thanks receipt of your letter of January 19. In reference to that part of your letter dealing with the new rules and regulations charts covering drum mixing points, we are forwarding a framed chart to every point that handles material in drums, regardless of whether the installation is a regular drum mixing set, a special Aviation mixing set, or a bulk scale tank.

I note that you have instructed our District Offices to make it perfectly clear to the refinery managements and to the operators that the new placards provide information relative to the handling of the drums only and that they are not intended to govern the precise handling of the bulk mixing equipment, and that moreover, these regulations for the present are temporary measures regarding the bulk equipment. Our only concern with regard to our previous correspondence was to be sure that proper instructions had been given as to procedure so that before a standpipe was removed from a drum, both were flushed with gasoline. Naturally, this gasoline-Fluid mixture would not go into the scale tank but would have to go back to the main gasoline system. To educt Fluid from drums to the bulk scale tank without subsequent flushing with gasoline each time the standpipe was removed would naturally be quite hazardous.

I am very much perturbed about your remarks regarding transportation of drums. I am wondering if you have the right picture.

For years we have undertaken inspection of stowage of drums on vessels and our procedure has been based on the three following general points:

- (a) safe handling of the drums from the pier to the vessel through the use of proper nets, etc., loading one drum aboard at a time.
- (b) on-deck stowage whenever possible and practicable with suitable provisions for lashing the drums securely to prevent their movement during rough weather.
- (c) 'tween-decks in suitable lockers, when on-deck stowage is not practicable, and in which compartments no other material is stored, and which is provided with either scuffer or other suitable drainage directly to the side of the boat, not connected in any way with other drainage, and locker provided with means of ventilation.

Practically all cargo vessels have such compartments and the construction of the flooring is such that in the event of a leak the material would not seep through to the "hold" cargoes. Ventilation is normally provided by the 'tween-deck hatch when

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open (which is generally of large enough area to admit a reasonable supply of fresh air), and by means of ventilating ducts running to the top decking.

Moreover, in a number of instances shipments are made on passenger-freight vessels and certainly under these circumstances stowage of Fluid in locked compartments is better than on-deck where in the event of a leak, a passenger might innocently come in contact with the Fluid or the fumes, or the fumes might be transmitted to the cabins if the wind were prevailing in the right direction.

Never to our knowledge have shipments been stored in the "hold". Furthermore, we have never permitted 'tween-deck stowage unless the above conditions exist and we are sure that in the event of a leak the Fluid could be flushed from the floor through the drain or scuffers out over the side of the vessel.

I would certainly appreciate additional information in regard to the two cases which you mention in the second paragraph of page two of your letter as I want to investigate these further so that using them as examples, we can correct such conditions.

As a matter for your information, I have just completed a report of boat inspections for the last nine months of 1934 and submit this to you as follows:

Bayonne, New Jersey	- 1 trip
Brooklyn, New York	- 4 trips
Camden, New Jersey	- 4 trips
Hoboken, New Jersey	- 1 trip
Jersey City, New Jersey	- 1 trip
Marcus Hook, Penna.	- 1 trip
New York, New York	- 14 trips
Paulsboro, New Jersey	- 7 trips
Philadelphia, Pa.	- 17 trips
Staten Island, New York	- 1 trip
Wilmington, Delaware	- 3 trips
Total	- 54 trips

While these trips are only a part of the total number of boat shipments made, as it has been somewhat impossible to contact on each and every shipment, we attempt, however, to make our inspections such that each steamship line had been contacted a number of times and complete information given to them as to the hazardous nature of the Fluid, the procedures to be used in case of a leak, and other information of an educational nature relative to the safe handling. You also might be interested in the attached report forms which are illustrative of our general practice.

While there may be a few isolated cases where the transportation of our drums on ships may not be entirely beyond reproach or criticism, I do not think you can conclude fairly that our general practice is definitely unsafe. Our record over the last several years must be given at least some consideration. Naturally on-deck stowage is preferable from the standpoint of ventilation, but on the other hand we have had to give major consideration to the question of lashing the drums securely, as well as recognition of other conditions in order to be entirely practical about our marine

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Mr. Robert A. Kehoe

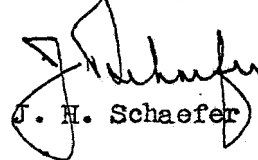
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shipments, which has resulted in the necessity of compromising on occasions. By the same token, I do not think that our compromise has ever been in the direction of unsafe handling. If you are going to insist that the tankers and other vessels make provisions for carrying drums on-deck, without some flexibility, or you will not permit them to handle our shipments at all, I am afraid that we are going to impede substantially the free flow of our business, particularly, on our European trade.

Don't you believe it might be preferable, before you take any definite steps in this entire situation, that you arrange to come to the plant some time in the near future, to discuss this matter with us more in detail? On the other hand, of course, I should be willing to come to Cincinnati to meet you there if it would be more convenient.

Very truly yours,


J. H. Schaefer

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