

May 24, 1939

Mr. H. Fossett
The Associated Ethyl Company Ltd.
The Adelphi, London, W. C. 2
London, England

Dear Mr. Fossett:-

I am sending to you herewith a brief notation which I propose as an amendment to Article 249 of the S.F.P. Regulation which you sent me. I believe that some of the other regulations are a bit naive in spots but I presume we need not be too much disturbed by this. I am disposed to wonder how it is possible to provide safety in entering storage tanks after indulging the statement in Article 239 that "Generally it is possible to enter and work without masks in a tank having contained light products". However I presume this is none of my affair. I believe my amendment to Article 249 will make it satisfactory for our purposes, and will take away some of the apprehension which might be felt in the cleaning of this equipment.

Very truly yours,

RAK:is

Robert A. Kehoe, M.D.

Amendment to Article 249

Tank cars, barges, rail tank cars, underground tanks (back from customers) are to be treated in a general way like storage tanks, except that no additional precaution need be taken when leaded gasoline (Esso, Stanavo etc.) has been carried in them, provided they have been used only to hold or transport leaded gasoline and not for mixing concentrated Ethyl Fluid with gasoline. Due to the small dimensions of the openings, these tanks etc

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