

THE ASSOCIATED ETHYL COMPANY LIMITED

Registered Office: THE ADELPHI, LONDON, W.C.2

Address all communications until further notice to:

ARTILLERY HOUSE, ARTILLERY ROW, LONDON, S.W.1

Telephone: ABBEY 3974

Telegrams: ETHYLPORT, SOWEST, LONDON

Directors:

N.A. GASS
J.B. AUG. KESSLER (NETHERLANDS)
G. LEIGH JONES
F.G.C. MORRIS
R.H. PORTERS

R.W. SELLERS
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G. SPRY
T.R.A. BEVAN (*Managing*)

OUR REF. S/7

YOUR REF.

2nd January 1947

Dr. R.A. Kehoe,
University of Cincinnati,
College of Medicine,
CINCINNATI.

Dear Dr. Kehoe,

Many thanks for your letter of 16th December and for your comments on our proposed changes in the "Regulations covering the cleaning, scaling and repairing of tanks which have contained leaded gasoline".

We appreciate very much your remarks and entirely agree with all of them. In fact, we should have much preferred not to make any modifications, with the consequent expense and trouble in distribution of the revised edition. However, the consensus of oil company opinion here was in favour of the changes and we felt it desirable to accede to their wishes.

We have noted with interest your remarks on the subject of the Ethyl Trademark. No doubt this question will be discussed by Mr. Bevan during his forthcoming visit to New York.

Yours sincerely,

H.D. ROFFEY

KE 0007247

N 7834

December 16, 1946

Mr. H. D. Roffey,
The Associated Ethyl Company Limited,
Artillery House, Artillery Row,
London, S. W. 1, England.

Dear Mr. Roffey:

I have gone over the changes in the "Regulations Covering the Cleaning, Scaling, and Repair of Tanks which have Contained Leaded Gasoline," as suggested by the representatives of Shell and referred to in your letter of December 6. I cannot but feel that our critics are being a little picayunish. However, I have no objection to your making the changes as you have indicated in the copy forwarded with your letter. You will be put to some inconvenience, and presumably to some expense, in making these changes, and I cannot see for the life of me what they contribute to the clarity of the situation. Do not misunderstand me. I am not becoming touchy in my old age, but it is to be remembered that it is quite impossible to take into account the predilections of various distributing companies in relation to phraseology. These regulations as issued by Associated Ethyl differ somewhat from the American version, and there is no very good reason why they should not. On the other hand, there are very good reasons why considerations of safety and hygiene should be dealt with in a substantially uniform fashion and on a world-wide basis. The more nearly this is done, the better it will be for all of us. To be sure, we must take into account the practices of the industry in different parts of the world, as well as certain differences in use of language. However, we must be cautious not to allow ourselves to be influenced unduly by the wishes of this, that, and the other operating group. I think, therefore, the Shell people might be brought to realize, without your being unduly discourteous, that their suggestions, which are concerned with their own operations, are made to apply to all of the other petroleum distributors without our having had a chance to consult the others with reference to a choice of words. It is my personal opinion that the words "sludge free" is just as likely to be misinterpreted, or perhaps too literally interpreted, as is our original expression. Again, however, I am quite willing to accede to the suggestions if you feel, from your end, that it is desirable so to do.

There is another matter in connection with the issuance of printed material, including regulations, to which it seems wise to refer, since this may not have been brought to your attention in London. Apparently the attorneys have given rather specific advice to Ethyl Corporation on the subject of strengthening its trade mark and patent rights. This seems to require quite careful use of the word "Ethyl," and the elimination of such expressions as have been in common use for many years, as for example, the term

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Mr. H. D. Roffey - (2) - December 16, 1946

"Ethyl Fluid." Hereafter the word "Ethyl" is to be set off by large letters or by some other distinctive means, while the use of "fluid" in capitals or otherwise is to be discouraged if not altogether abolished. Instead of these terms the expression "ETHYL Brand of Antiknock Compounds" is to be employed. I have just gone over all of our regulation booklets with the idea of bringing them into uniform conformity with this policy, and we are seriously considering the change of all the placards and other instructions. At least this will be done when any of these are reprinted next. I doubt very much if you will want to change your newly printed material, and I should doubt if this would be necessary. On the other hand, it is a matter which Mr. Bevan will wish to consider. If he wishes, any decision in the matter can be postponed until after his visit. I merely raise the question at this time in view of the fact that the above change has already been suggested, and if you plan to reprint any of these booklets, you may just as well make the necessary modifications to correspond with ours. I should imagine that some uniformity of action between the two companies in this regard would be desirable.

Sincerely yours,

Robert A. Kehoe, M. D.

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Copy by Air Mail.

Original by Steamer.

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T. A. BEVAN (Managing)

OUR REF.

S.7

YOUR REF.

6th December, 1946

A. Kehoe,

Cincinnati,

Dear Doctor Kehoe,

The subject of our latest tank cleaning regulations, i.e. those dated 1st July, 1946, has been reopened by our friends the Shell, who have asked whether we would be prepared to make one or two modifications to the present wording.

The changes they propose do not, as I think you will agree, involve any fundamental issues, but our Shell friends seem to regard them as important from the point of view of practical application.

The first point concerns the definition of a "clean" tank (Page 2). Shell feel that the use of the word "clean" may be misinterpreted by some of their field engineers and others to mean that the tank is "clean" in the petroleum sense. They suggest, therefore, that wherever the word "clean" has been used the term "sludge free" be substituted therefor. This would seem to be a good point since, although one could argue that it was not entirely necessary in view of the wording in the introduction of these regulations, nevertheless, it does tend to remove any possible misunderstanding.

They further suggest that under the heading "Definition of a 'sludge free tank'" (Page 2) the following sentence, or rather paragraph, be added:

"It will be clear, therefore, that a 'sludge free' tank can be entered without either an airline mask or a respirator, provided that no work which creates a dust hazard is being carried on inside the tank."

The above paragraph does not seem to be in conflict with our ideas and although again it seems hardly necessary, we suggest that unless you have any objection, it be accepted.

The only other suggestions that our Shell friends have to make relate to Section B on Page 4 "Scaling of tank walls - removal of rust scale". Shell feel that under certain conditions of operation, it is not possible to ensure that the inside surfaces of the tank will be kept wet. They point out that in the tropics the heat of the tank walls is such that it would require a constant stream of water in order to ensure that the inside surfaces were kept wet. In very cold conditions

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N. A. GASS

R. H. PORTERS

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J. S. AVERKESSELEN (HOLLAND)

D. A. SHEPARD (U.S.A.)

S. LEON JONES

A. J. SINGLETON

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F. S. C. MORRIS

T. R. A. BEVAN (Managing)

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wetting of the walls would result in the immediate formation of ice. For these reasons, they consider it advisable to insist that all men engaged on scaling operations wear proper respiratory equipment. We feel that their point is well taken and again, provided you have no objection, suggest it be accepted.

It is suggested that Paragraph (B) (Page 4) "Scaling of tank walls - removal of rust scale" read as follows :-

1. The removal of rust scale from the inside surfaces of a tank must not be undertaken until the tank has been passed as 'sludge free' by the responsible person in charge of cleaning
2. All men engaged on the scaling operations must wear overalls, efficient dust respirators and goggles or alternatively full face-piece canister type respirators. The object of wearing a respirator is to avoid inhalation of dust.
3. To assist in the prevention of dust it is desirable that the inside surfaces of the tank be kept wet whenever possible.
4. The accumulated rust scale from the scaling operations must be handled only in a wet state, both within the tank and after removal. This rust scale must be buried in a place where it will not be uncovered later.

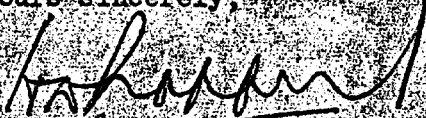
Our Shell friends, whilst apologising for having reopened this question, say they are most anxious to issue our regulations without further elaboration to all of their installations, and they would not feel too happy about this unless

now suggested.

They fully appreciate our policy of making the regulations as little restrictive as possible, but feel that the proposed alterations are desirable from the point of view of practical application in the field.

We should not, of course, be prepared to accept any alterations without your full approval, and accordingly we should much appreciate your views on the foregoing. For your guidance we enclose a booklet modified in the proposed manner.

Yours sincerely,



T. R. A. BEVAN

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