

September 28, 1931

Dr. Frank R. Morton,
Standard Oil Company (Ind.),
910 South Michigan Ave.,
Chicago, Ill.

Dear Dr. Morton:

During the past year it has come to my attention on a number of occasions that certain special mixes of ETHYL fluid with gasoline are being made from time to time at refineries of the Standard Oil Company of Indiana, by methods which are not only a direct and intentional infraction of the rules and regulations which we have issued, but also such as to constitute a definitely dangerous practise. The following things are being done from time to time. Tank cars of gasoline are being treated with very much more than the proper commercial concentrations in order that they may be shipped here and there to bring up concentrations of other batches of gasoline to their proper lead content. This is not a good practise, and would lead to rather serious complications since there is an understanding with the United States Public Health Service that gasoline for commercial purposes will not be treated in such a way as to contain more than 3 c.c.'s of lead. It does not seem that the Ethyl Gasoline Corporation should be in danger of having its good faith brought into question by this kind of action. Even if this consideration could be ignored, it is not possible to ignore the possible hazards associated with the handling of gasoline containing high concentrations of Fluid. However, this is not the worst practise of which I am cognizant. From time to time Fluid is removed from drums and is sometimes carried considerable distances in five gallon and in other containers, in order to put it into gasoline which does not have the desired quantity of Fluid. I do not think I need emphasize the dangers which are intrinsic in this kind of practise. Such dangers involve the men who handle the Fluid, and they also reach a public significance when Fluid is handled in this fashion on either railroads or trucks.

If these were rare instances, and if they were carried out through the ignorance or lack of consideration on the part of some minor employee of the Standard Oil Company of Indiana, it would not be as significant as it is. However, I know enough of the manner in which the company handles its affairs to know that it would be utterly impossible for this

KE 0000581

procedure to be carried out repeatedly without the consent and without specific order from a high official of the Company. This of course means that there is a deliberate willingness on the part of some person or persons to violate both the letter and the spirit of the regulations which have been issued for the proper handling of ETHYL Fluid. I find it impossible therefore, to ignore it, for it brings about a risk which it is not safe to overlook.

I do not wish to cite specific instances, nor do I wish in any way to involve any of the employees of the Company, but it should be perfectly clear that it is almost impossible for these practises to be carried out without my knowing about them at some time.

I bring the matter to your attention because that seems to me to be the simplest manner of correcting the trouble without bringing about any unpleasantness. I am quite certain that this matter has never been brought to your attention, and that through your association with the entire safety program of the Company you can easily cause it to be understood that the rules and regulations which we have issued are only the minimal requirements for the safe carrying out of the handling of ETHYL fluid. I am sure that if you glance through the rules which we have promulgated, as you have doubtless done, you will see that there is no one of them which is unreasonable, nor is there any one which is not specifically designed to promote safety with a minimal amount of inconvenience.

I would appreciate it very much indeed if you would look into this matter, or if you would let me have any comments or suggestions as to what might best be done. If you prefer, I should be glad to leave the entire matter for you to handle in whatever way seems best.

With kindest personal regards.

Cordially yours,

RAK:EJ

KE 0000582