

January 19, 1935

Mr. John Schaefer
Ethyl Gasoline Corporation
P. O. Box 688
Wilmington, Delaware

Dear Mr. Schaefer:

I have copies of your various letters concerning the information which is to be sent out to mixing plants of the tank storage type where Fluid is shipped and handled in drums.

It is not feasible at this time to re-draft the regulations in relation to the handling of tank car and tank storage equipment. This will be done within a reasonable period but I do not wish to do it until I have all of the necessary information at hand as to what is likely to be done in the course of the next several weeks or months. The whole question of the number of drums involved in this business is at stake, and I feel reasonably certain that something will be done shortly which will materially reduce the number, if for no other reason than that the transportation of these drums is at present sufficiently dangerous to warrant careful examination. I shall refer to this later in this letter.

With regard to the instructions to be sent out, I think that every customer of the Corporation who is now receiving drums of Fluid for emptying in storage tanks, should be provided with a sufficient number of copies of the new regulations concerning the handling of drums so that it will be certain they have available information on which to handle such drums properly. Moreover, placards having to do with the handling of drums should be posted at these mixing plants along with the other placards which involve the handling of the bulk equipment. I should be made perfectly clear to the managements and to the men that then new placards provide information relative to the handling of drums only, and that they are not intended to govern the precise handling of the bulk mixing equipment. It should be fully pointed out also that this is, for the present, a temporary measure in view of an immediate necessity which has arisen for the re-editing of the

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regulations which are concerned with bulk equipment.

I am not afraid that the new regulations or the new placards will result in error in handling the Fluid at the bulk mixing plants, for the manner of handling the Fluid and washing out the drums after they are emptied, has been so arranged at these plants that no difficulties should arise. What I am afraid of is that in the absence of instructions the drums of Fluid will be improperly stored, and improperly handled, as indeed they have been in some degree in the past.

Returning to the subject of transportation of drums, I have only recently discovered that it is the general practice in coast-wise trade, and for ought I know, in European trade, to store the drums of Ethyl Fluid below the deck in a substantially enclosed compartment where they are stood on end, and lashed in place as securely as possible. I have been under the previous impression that it was the general practice to have the drums of Fluid shipped on deck, at least in a place where the sides were open or freely ventilated, and where the opportunity existed for hosing out any spilled Fluid. It was a shock to me to find out that this is not the case. I must come to the conclusion that our present method of transporting drums on ship board is unsatisfactory, definitely un-safe, and that it is simply a means of inviting trouble and disaster. It is not proper to say that the dangers are imaginary rather than actual, since I have already established the fact that in at least one instance, considerable quantities of Fluid have been spilled in a compartment under the deck of a cargo vessel not the property of one of the Oil Shipping Companies. The Fluid in this instance was cleaned up as satisfactorily as possible by a representative of the Corporation, but not without involving an exposure to lead on his part which is by no means pleasant to contemplate. Mr. Walter and I have discussed this matter, and we are of the opinion that something will have to be done to make certain that this condition does not exist in the future. Either the tankers and other cargo vessels will have to make provision for carrying Fluid on deck, or they will not be permitted to carry it at all.

One other word with regard to regulations and placards at the bulk mixing plants in which drums are handled. I am writing Mr. Walter today, suggesting that a field representative of the Corporation make it a point to discuss with the management at each of these points, the matters in the drum mixing regulations and

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placards which specifically effect the handling of Fluid at these points. I think this is necessary to avoid any mis-understandings and to make it perfectly clear that the application of the drum mixing regulations and placards to the bulk mixing apparatus is for the present at least, a temporary measure. Moreover, this procedure will result in a clear understanding among the field staff, and among the refinery personnel as to just what is expected of them.

Very truly yours,

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Robert A. Kehoe, M.D.

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