

March 11, 1939

Mr. Hugh Fossett
Ethyl Export Corporation
Thames House, Millbank
London, S. W. 1
England

Dear Mr. Fossett:-

I have your letter of February 27th concerning Mr. Morgenthau's question about certain differences between the rules and regulations applying to drum mixing plants and those applying to bulk storage plants where the tanks are filled from drums.

Let me say at the outset that there are differences in the regulations applying to these situations, and that these differences are deliberate and based on experience. The problem of emptying drums into bulk storage tanks is a totally different problem than that of emptying drums at drum mixing plants, and for this reason the regulations applying to the two are different. It is entirely safe to dispense with the continuous use of masks at drum mixing plants where the workmen step away from the immediate vicinity of the drum and permit it to be emptied at moderate speed. On the other hand at bulk mixing plants where the tanks are filled from drums, the drums are emptied as rapidly as possible and the men stand continuously beside the drums and are hence within the field of exposure. It is my wish that masks be used continuously during this period for otherwise there will be no security. Accordingly this translation must be left precisely as the English reads, and nothing must be left to the judgment of the workmen in this regard.

You might tactfully convey to Mr. Morgenthau that all of the regulations are based on experience and not theory, and that, therefore, his criticism of them or his discovery of apparent discrepancies are without significance. He should be guided in every instance by the exact wording of the regulations since they have been carefully criticized word for word, and say exactly what I want said.

regards, I am

With kindest personal

Sincerely yours,

BAR:is

Robert A. Kehoe, M.D.

cc Mr. Champlin