

COMPANY LIMITED

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

COPY

Forrest,
Kaiser,

John Lear wrote you on 1st February enclosing copies of those safety regulations which we had attempted to revise. Since that time there have been further discussions on tank cleaning arising out of the recent incidents here, and as a result we have had another go at revising the tank cleaning regulations.

I enclose with this letter copy of our suggested revisions, the reasons for which I think will be fairly obvious to you.

During the course of our recent discussions it became obvious that there was a certain amount of misunderstanding in regard to what was permitted, and what was not permitted, when cleaning a tank, and the main object of our suggested revisions is to clear up these misunderstandings, and particularly to draw the line between:

- a) the removal of sludge and cleaning of tank bottoms and
- b) descaling and repair operations.

Would you please discuss these revisions with Dr. Kehoe and also Oscar in the event of their being acceptable obtain Dr. Kehoe's approval to them under his authority.

As mentioned to you in an earlier letter we plan to send out our revised regulations with our new Sales contracts, which must be in our customers' hands by 1st, and therefore we have not much time left to settle the final version. Under present day conditions it will take a month at least to get it done.

Sincerely yours,

T.R.A. BEVAN

Enc.

to

D.A. Kehoe

KE 0307346

N 7864

Petroleum Board

COMMENTS MADE AT A MEETING BETWEEN MESSRS.
TIPLER, SPRINGETT, TREEN AND COLES on
"REGULATIONS COVERING THE CLEANING, SCALING
AND REPAIRING OF STORAGE TANKS WHICH HAVE
CONTAINED LEADED GASOLINE: 21/2/46.

PAGE 1.

INTRODUCTION:

3rd paragraph It is noted that the regulations specify a warning notice must be located above each manhole cover. This might prove difficult in the case of certain of the tanks, particularly some of the large tanks and possible some of the small 30' x 9' tanks under the custody of the Board. It is suggested that the phrasing might be altered to include a reference to manhole cover normally used for obtaining access to the tank.

The wording in the notice might be altered to read:

"THIS TANK HAS CONTAINED LEADED GASOLINE. THE SPECIAL PRECAUTIONS LAID DOWN MUST BE OBSERVED WHEN ENTERING".

SOURCE AND NATURE OF THE HAZARD

In the first paragraph dealing with the sludge the words "in a very small percentage" should be deleted.

PAGE 2.

REPAIR OPERATIONS.

The last sentence specifies a positive pressure airline mask as the only one permitted for entering a tank before it has been cleaned. We would like to suggest that a free airline mask with hose length not exceeding 30' and a self-contained PROTO-type mask should be included in this paragraph.

SECTION 1.

STORAGE AND MIXING TANKS

The first sentence after the words "Mixing Tanks which

KE 0007347

N 7864.01

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SECTION 1.

STORAGE AND MIXING TANKS

The first sentence after the words "Mixing Tanks which have at any time contained leaded gasoline" insert the words "and have not been thoroughly cleaned".

PAGE 3.

SECTION (A): PARAGRAPH 2.

The same remarks regarding other types of mask apply as under page 2, paragraph 3.

KE 0007348

PARAGRAPH 2.

No direction is given regarding the direction of the wind given to men handling sludge outside a tank where the vapour of the vapour should be avoided. Should not these operations be done in General Service masks and protective clothing?

Should not the disposal of the sludge referred to in paragraph be amplified to warn individuals regarding the special hazards to drainage, drinking water supplies, etc.?

SECTION (B): PARAGRAPH 2.

This deals with clothing of operatives engaged on sealing and requires that they should wear overalls. We would recommend that all the other protective equipment specified should be issued to such operatives.

PARAGRAPH 3.

Delete "should" and replace by "must".

PARAGRAPH 4.

Positive pressure airline mask should be supplemented by free airline and self-contained PROTO-type mask.

PARAGRAPH 5.

Delete "filters in" leaving the sentence to read "Respirator cannisters have a limited life and must be renewed after 25 hours of use".

PAGE 4:

SECTION C: PARAGRAPH 3.

As cleaning and sealing of the tanks should have predated any repair operations there should be no possibility of dust being present. Therefore, paragraph 3 can be deleted.

In a similar way, paragraph 5, there should be no hazard due to tetraethyl lead on the outside surface of any tank or component; paragraph 5 should also be deleted.

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PARAGRAPH 4.

Delete "filters in" at the opening of the sentence, and insert "25 hours of use".

SECTION 2.

The handling of the sludge and deposits from pipelines should call for similar precautions as called for under tank cleaning, and our recommendation would be that the personnel should be issued with similar protective clothing and should be wearing masks.

PAGE 5:SECTION 3: Second sentence:

from tetra-ethyl lead vapour when working on the outside of a garage or filling station tank or any component thereof, and the sentence can, therefore, be deleted.

SECTION 4: RAIL AND ROAD TANK WAGGONS.

Is it thought that the removal of scale from rail and road waggons is a non-hazardous operation in that the personnel are not called upon to adopt the precautions as laid down under 1(A)?

SECTION 5: OCEAN TANKERS AND BARGES.

Our particular interest is in regard to barge tanks which may be cleaned under contract. Should not the precautions as laid down under 1(A) be called for?

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