

Letter - { Thanks
 { reasons for separate books of material.
 { Return of Ethyl Chloride material.

ETHYL GASOLINE CORPORATION

MANUFACTURING DEPARTMENT

DEEPWATER PLANT

INTER-OFFICE
CORRESPONDENCE

PENNS GROVE, N. J.

February 5, 1931

Dr. Robert A. Kehoe
University of Cincinnati
College of Medicine
Cincinnati, Ohio

Dear Dr. Kehoe:

In further response to your letter of January 28 and in discussion of the revised Rules & Regulations governing the handling of ETHYL Fluid to include safety practices for tank car equipment, I am taking this opportunity to offer freely suggestions which you may take or disregard, as you desire.

We have not sent out any other instructions as to the care of tank cars before and after emptying except those contained on the returned form of bill of lading, forwarded each time a tank car shipment is made. You will find attached hereto a copy of this bill of lading which will be self-explanatory.

I agree with you that specific instructions as to the manner of making connections to the tank car should not be included, as plant policies vary considerably, but I do believe that all safety features should be clear and definitely specified.

In the first place, I noticed that on the cover of the revised booklet on rules and regulations, you have specified for tank car equipment only. It is my suggestion that these rules and regulations cover the handling of all ETHYL Fluid, including drums. With this in mind, I have taken the liberty of criticizing and offering suggestions on certain of the general rules contained from Pages 1 to 4 in this booklet.

Referring to paragraph #5 on Page 1, you have taken this out. I would advise to let it remain and be worded as follows:

"All mixing systems which handle concentrated ETHYL Fluid in drum quantities must be kept and mixing done out of doors. No such system may be inclosed or set up in such a way that it is inclosed, regardless of weather conditions, except as adequate, forced, down ventilation is provided."

Similarly, in omitting the original paragraph 8, I would revise as follows:

"Drums of ETHYL Fluid are to be stored in a well ventilated space, protected from the direct rays of the sun. Such space must be separated from the general storage facilities of the plant, and adequate means provided for preventing

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handling of these drums by other than authorized persons."

Referring to Page 2, original paragraph 11, which you have now designated as paragraph 9, I would change as follows:

"At least two approved type gas masks are to be provided at each mixing system. If possible, the air type of mask is recommended. However, Burrell or Bullard-Dadis are suitable for this purpose."

Referring to page 3, paragraph 7, I would alter to the following:

*****. If they have a hole in them or if they are spongy they are more dangerous than no gloves at all, and they should be immediately destroyed and a new pair secured. If anything has been touched which contained ETHYL Fluid, the gloves should be immediately destroyed also."

Similarly, to paragraph 8, change to the following:

"If your clothes are splashed or wet with ETHYL Fluid, take them off immediately and destroy them. The ETHYL Fluid will soak through and get on your skin."

Regarding the special rules which you have inserted in this booklet, I would suggest the following arrangement:

Special Rules for Handling Tank Cars of ETHYL Fluid.

1. Full Cars.

(a) Unloading Tank Cars of ETHYL Fluid.

As soon as the full tank car is placed at the unloading spot, brake car in place prior to connecting to swing line and protect car from removal by use of suitable track banners.

Under no conditions should tank cars be sampled.

While emptying tank car, it is suggested to keep "Poisonous" placards in place and then upon final flushing of car with gasoline, immediately reverse placards to "Dangerous-Empty."

All persons in any way concerned with the work of opening the car and making the proper connections are to be provided with the regulation clothing prescribed in the foregoing section, and with aprons, rubber and canvas gloves, and with gas masks. The work shall be done only by those persons designated for the purpose, who are kept under strict medical supervision.

By use of the key supplied, unlock and remove lock in the dome and and open the lid of the car, making careful inspection to determine

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whether or not any ETHYL Fluid has escaped into the top of the car. There should be no evidence of Red stain nor should there be any odor of ETHYL Fluid. If such is present, however, the operator should put on his gas mask at once and remove all Fluid by swabbing the area with clean kerosene on waste and disposing of the waste by burning, as soon as the job is completed.

Washing Out Tank Cars.

After the Fluid is emptied into the storage tank through the vacuum system, the tank car should be systematically washed out with fresh gasoline. Such washings not only remove the last traces of Fluid which has been purchased, but it also washes out the entire line from tank car to storage tank in such a manner to remove any traces of ETHYL Fluid in this part of the system. To accomplish this properly, repeated washings are necessary.

A large quantity of gasoline should be introduced into the tank car after making certain that the suction in the vent line from the car carries all fumes back to the storage tank. After partially filling the tank car with gasoline, it should be pumped out and the process repeated until it is certain that the concentration of ETHYL Fluid in the gasoline in the last washing is negligible.

Never, under any circumstances, vent the tank car into the mixing or storage house.

Schaefer
Mr.