

Ethyl Corp. Company Policy

ETHYL CORPORATION
1600 West Eight Mile Road
Ferndale, Michigan #48220

December 6, 1967

Product Service Circular
Letter Number PS-7-67

TO REGIONAL MANAGERS

Subject: SAFETY POLICY

COPY FOR _____

The basic Safety Policy relative to the handling of antiknock and other PCD products has been reviewed; a copy is attached.

Product Service requirements relative to this policy are listed below. Some modifications will be noted. They were made to keep abreast of changes in refinery equipment and blending procedures -- trends to refinery automation, in-line blending or union requirements.

The requirements as listed below are designed to make it possible to effectively carry out Ethyl's basic Safety Policy. While the frequency of antiknock accidents is not increasing they do occur. There have been recent incidents of serious mixing plant fires which have resulted in demolished lead plants, large spills, lead intoxication and fatalities. Also, the threat of unnecessary legislative controls involving antiknock continues to exist. Thus the need for high safety standards is as necessary today as in years past.

Furthermore, the Ethyl Mixing Plant is a most valuable established Ethyl image. Services in this area can set up a chain reaction of other effective services which can influence the sale of Ethyl products.

Fulfillment of the basic Safety Policy is mandatory. The fundamental requirements are:

Blending System Surveillance

This is a most important Product Service activity. Since the Ethyl Mixing Plant, In-Line Blender, Octane Analyzer, PBON Unit, and Knock Test Laboratory are becoming an integral part of a complex gasoline blending system, the Ethyl Product Service Engineer must maintain frequent contact with customer personnel who are responsible for equipment operation. This is especially important if Ethyl supplied the system design and/or the actual equipment. The Product Service Engineer should know when equipment malfunctions occur and take immediate steps to correct equipment or operator problems. The need for close observation and follow-up during construction and start-up can not be overemphasized.

KE 0002542

December 6, 1967

Tank Car/Truck Unloading Observations

A minimum of one unloading per refinery is to be observed and reported annually. (This effects only those refineries with multiple mixing plants. Past requirements called for one annual unloading observation at each mixing plant within a refinery.)

Mix Observations

Tank car/truck plant -- Mix observations should be made when considered necessary by the Product Service Engineer. (It was an annual requirement.)

Drum plant -- A minimum of one mix observation to be made annually.

Mixing Installation and Laboratory Inspection

No change in requirement -- A minimum of one inspection per quarter and a minimum of one annual report.

Annual Safety Meetings for Management and Blending Personnel

No change -- A minimum of one annual meeting and report.

Laboratory Investigation Reports of Overleading

No change -- It is imperative that each overleading be investigated and reported.

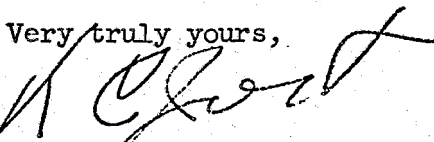
A and N Contacts

No change -- To be made semiannually with one annual report.

Tank Cleaning

No change in Tank Cleaning Policy and report procedures.

Very truly yours,



K. C. Jost

S A F E T Y P O L I C Y

A BASIC POLICY OF THE PETROLEUM CHEMICALS DIVISION OF ETHYL CORPORATION IS TO INTERPRET AND CARRY OUT THE SPIRIT AND LETTER OF RECOMMENDATIONS OF THE SURGEON GENERAL OF THE UNITED STATES PUBLIC HEALTH SERVICE ON THE HANDLING OF ANTIKNOCKS. A SIMILAR VIGILANCE IS FOLLOWED BY THE DIVISION ON THE HANDLING OF OTHER PRODUCTS IN ACCORDANCE WITH PROCEDURES CONCURRED IN BY ETHYL'S MEDICAL DEPARTMENT. THIS POLICY MUST BE FOLLOWED TO PRESERVE THE PUBLIC HEALTH, TO PROTECT THE HEALTH OF ITS EMPLOYEES AND ITS CUSTOMERS, AND TO AVOID UNNECESSARILY RESTRICTIVE SAFETY LEGISLATION.

As they currently apply to the handling of our products, the fundamental details of this policy are:

I. PRINCIPLES

- A. To prevent accidents attributable to our products.
- B. To design and maintain safe and efficient methods of handling "Ethyl" compounds.
- C. To serve our customers by solving problems that relate to the use of our products.

II. OBJECTIVES

- A. To train all personnel involved in the use of our products, by precept and example, in the principles of safe practice.
- B. To see that our safety assignment is carried out by fully qualified personnel.
- C. To conduct all safety work on a high professional plane with no sacrifice of fundamental principles.

KE 0002544

SAFETY POLICY

(2)

- D. To strive continually for uniformity and improvement.
- E. To make every safety decision thoughtfully with due regard to its possible ultimate effect on everyone involved.

III. RESPONSIBILITIES

- A. Under the functional guidance of the Medical Department those directing the handling and distribution of our products are responsible to Management for formulating and carrying out the safety policy.
- B. Local management is responsible for carrying out this safety policy in its operations.

11/15/66

R. A. Douglass, Vice President
and General Manager

KE 0002545

SECTION II

PRODUCT SERVICE AND SAFETY Petroleum Chemicals Division

GENERAL POLICY

The formulation of policies relating to safety and hygiene is the responsibility of Management. The Manager of the Product Service and Safety group of the Petroleum Chemicals Division is responsible for recommending safety policies and procedures to Management and furnishing liaison with the Medical Department on these matters.

RESPONSIBILITY OF THE MEDICAL DEPARTMENT FOR HYGIENIC ACTIVITIES

All matters concerning illness or disability should be referred to members of the medical staff of Ethyl Corporation for action. All new or unusual hygienic problems should be referred to the office of the Medical Director, using telegraph or telephone in urgent situations. In some cases, the security or survival of individuals or a group may depend on prompt action. When this occurs, no consideration or formal procedure should be permitted to cause a delay. The Medical Director is located at the Kettering Laboratory, Eden and Bethesda Avenues, Cincinnati, Ohio. He can be reached by letter or telegram at this address, by cable addressed to Ketlab, Cincinnati, Ohio or by telephone -- (513) 281-6812.

DIRECTION OF PRODUCT SERVICE AND SAFETY ACTIVITIES

The policies concerning the activities of Product Service and Safety of the Petroleum Chemicals Division are directed by the Vice-President and General Manager of the Division.

The Product Service and Safety group serves the operating groups in a functional capacity. Information on product service and safety matters

is given to division personnel through line-supervisory channels (i.e., Regional Manager, etc.). The Regional Manager is responsible for directing these activities in each region, through the Regional Sales Manager and District Managers.

Technical advice on product service and safety activities is furnished to the Chief Product Service Engineers of the regions by the Manager of Product Service and Safety. The intent is to keep the regions up to date on problems in the entire program of safety.