

ETHYL GASOLINE CORPORATION

CHRYSLER BUILDING
405 LEXINGTON AVENUE

SAFETY DIVISION

NEW YORK November 28, 1940

ROBERT A. KEHOE, M.D.
CHAIRMAN

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Dr. W. F. Machle

Dear Bill,

Several times the question has come up very much like the following paragraph from our Los Angeles Division:

"An interesting point came up in connection with the definition of a thoroughly cleaned tank. We cannot assume that a tank has been thoroughly cleaned until all of the sludge and loose material has been removed from the bottom of the tank and the floor is dry. Theoretically, we can say that immediately prior to the removal of the last bucket of sludge, the tank has not been thoroughly cleaned and full precautions should be applied. Again, theoretically, we can say that as soon as the last bucket of sludge has been removed and the floor is clean and dry, the tank is thoroughly cleaned and our precautions need not apply for entrance into the tank. The point was made that since the danger is vapors arising from the sludge and since those vapors are not only heavier than hydrocarbon vapors but heavier than air, is it not possible, even after the source of these vapors, namely the sludge, has been removed, for the vapors to still remain? Normally, aeration of the tank would eliminate any remaining vapors in time, but what is the practical time limit between those instants when the tank is theoretically hazardous and theoretically non-hazardous?"

If you could give us your opinion on the possible toxicity of atmosphere in the tank after the tank has been thoroughly cleaned of solid material, we should appreciate having it.

Very truly yours,

KE 0022547

Russell Schell