

January 29, 1935

Mr. John Schaefer
Kthyl Gasoline Corporation
P. O. Box 688
Wilmington, Delaware

Dear Mr. Schaefer:

Thanks for the copies of your various letters which have come in the past few days, and particularly for your letter of January 22nd regarding transportation of drums.

I am quite willing to admit at the start that our past record on the transportation of drums is good. However, I do not think that a past record is any justification for the continuance of practices which are potentially dangerous. What I have had to say about the matter is not based on anything new in the situation except my recognition of the fact that certain aspects of the problem of transportation are not being taken care of as well as it seems to me they should be. I do not believe anyone is to blame for this. Rather I think we must recognize that one of our chief problems is the anticipation of dangers, and the avoidance of difficulties before they occur. It is from this point of view that I am quite willing to say and repeat that our practices in the handling of drums are not as safe as they can be made.

With regard to the transportation of drums of Fluid on tankers, I think we will have to admit despite anything that has been said about it in the past, and despite all evidences of our previous experience as to the frequency of difficulty, that if a drum were to develop a serious leak or be ruptured in transportation, a serious situation would be developed thereby on ship-board. It may be true that the compartment in which the drums are carried can be washed out directly into scuppers by water from a hose. (I am not certain from my own observation that this is true, but I will accept it as likely). Even so, in order to clean up the spilled Fluid even by washing with a hose, it will be necessary for some persons or persons to enter the compartment in which the drums are stored. The ventilation of such a compartment even with the hatch wide open, will have to be admitted to be negligible in so far as the vapor in the lower part of the space is concerned. Recognizing that concentrated vapor in such a

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place is likely to produce serious and perhaps even fatal illness as the result of two hours or more of exposure, I do not see how we can fail to regard this kind of a situation as definitely unsafe. Moreover, recognizing the fact that individuals on the ship go through this space and with sleeping rooms opening into it, I can not regard the danger as merely nominal and hypothetical. Any spill here is likely to result in difficulties.

In a number of European ports there is now a considerable anxiety about the handling of drums of Fluid. I should like to ask you what you think would be the consequence of having a ship with Fluid spilled in such a compartment as I have described, when it arrived at a foreign dock. Quite apart from the actual dangers, if this became known, it would produce a rather serious situation and would probably result in official action by the harbor authorities.

The fact is that the weakest spot in our whole chain of precautions is to be found in the transportation. It is, therefore, at this point that we are the most likely to have serious difficulty, and it is also true that any difficulty which does occur at this point is more likely to have serious results from the point of view of interference with the activities of the Corporation than if it were to occur elsewhere. I feel, therefore, that it is necessary to throw additional safeguards around this portion of the business, and in line with that I feel that it should be possible to work out a plan with the agencies of transportation whereby if unexpected accidents do occur, they will not result in serious consequences. I see no reason why tankers could not provide facilities for carrying drums of Fluid on deck. I am quite willing to admit that their present facilities are not suitable for the purpose, but in recognition of the dangers to themselves and to others, what is to hinder them from providing adequate facilities?

While we are speaking of this problem, I may as well tell you that we have been informed that on the Pacific coast there are a number of places at which drums of Fluid are unloaded from vessels by means of blunt hooks which engage the drum under the rim on either side. This practice has been engaged in for some time, and according to my information it was inaugurated when a drum broke through a faulty net. From what I have seen it would be my judgment that the drums could be handled with the greatest safety by means of a rope sling, and not by means of a net. I should think that the opportunity for cutting a net would be rather frequent, whereas a suitable rope sling would not be subject to the same danger. However, I am not in position to speak with authority on this aspect of the matter. I can only think with fear, however, of the handling of these drums by means of a hook

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which engages the rim. Certainly some time one of these rims will be torn away and the contents of the drum will be spilled.

The instance of spillage in a space on a vessel which I mentioned in my letter of January 19th was reported to me by Mr. Shell, one of Mr. Ronan's men. I can not give you the precise details of where it occurred or on what ship, but I think Mr. Walter can do so. In any case he can obtain the full information for you.

In the second paragraph on the second page of your letter you state your opinion that it is better to have the Fluid in a locked compartment than on deck, since passengers might be inadvertently exposed if a leak were to occur. It is possible that that point of view may be correct. However, I am not convinced of it, and unless there are facilities on board such vessels for the cleaning up of spilled Fluid without exposure on the part of the men, I would be inclined to regard leakage in such a space as a serious danger. It does not seem feasible to me to make arrangements whereby masks, rubber gloves, and suitable clothing will be carried on vessels which transport Fluid. However, I would believe it entirely feasible to make arrangements with shipping companies whereby some space might be provided on deck which is not readily available to passengers, and which might be placarded, if necessary, in such a way as to keep passengers away from it.

With regard to the last paragraph of your letter, you need not be unduly anxious over what I may do about this whole matter. I do not know at the moment just what can be done or what is best to do. I am merely pointing out what seems to me to be serious dangers with the idea that the facts will be carefully determined, after which we shall be in position to know what is best to do. That there is no great immediate danger is perhaps true in terms of our previous experience. On the other hand, I should like to point out to you that if troubles do occur, it will not suffice to say that one is sorry and that one did not realize the existence of danger. It is our business to know where the danger is, and we should know it better than anyone else. It is, therefore, up to us to handle these matters not in the light of what seems to be good enough, but rather from the point of view of what is the best possible means of avoiding difficulty.

Sincerely yours,

Robert A. Kehoe, M.D.

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