

MEMORANDUM ON MODIFIED TANK CLEANING PROGRAM

The tank cleaning program is being modified, and this memorandum is to serve as a guide for Division Managers and their staffs.

1. OBSERVE THE CLEANING OF ALL LARGE TANKS

Tanks are arbitrarily divided into two categories, large and small. All tanks over 1000 barrels capacity should be observed if at all possible. On the largest tanks requiring some days or even weeks, it is not necessary for the safety engineer to remain in constant attendance, provided the Division Manager has specifically delegated to him the responsibility for safety during the cleaning and in his best judgment conditions will permit him to leave from time to time to attend to other duties. Only if all factors indicate no accident from lead exposure will occur should our man leave. In such cases a safety engineer can perform nearby duties, or attend another tank cleaning some distance away instead of remaining constantly on the scene of the first tank cleaning for days and weeks at a time. However, he should be there when work begins and during any critical stages. Any time he is absent, he should let the foreman know where he can be reached.

2. ATTENDANCE AT THE CLEANING OF SMALL TANKS (UNDER 1000 BARRELS) CAN IN SOME CASES BE OMITTED.

This reduction in attendance should be based on the judgment of the Division Manager and the safety engineer as to the conditions prevailing at the scene of the tank cleaning. It should largely be based upon: A. Whether or not the foreman and crew to do the work are known to be good operators according to our standards. Are we thoroughly familiar with their work, equipment and attitude, through frequent past contacts. B. What the type of work is. If no entries are contemplated, it is more likely the division manager will favorably consider not attending. If entries are contemplated, careful consideration should be given to the type of work involved, repair work being an unfavorable factor, but the exact nature of such repair work should be considered. C. Expected length of time men will spend in the tank. As a general rule, a tank, regardless of size, that will require any one man's time inside for a period longer than three or four hours should be considered a "must" tank and we should attend, at least during the initial period of work. Tanks requiring less than this time may be considered for elimination. All tanks that have ever been used for Fluid blending in any manner should be considered "must" tanks.

3. SUGGESTED PROCEDURE AND KEEPING OF RECORDS.

The details of any tank cleaning not to be attended should be thoroughly discussed by telephone conversation between the Ethyl representative (probably division manager or his assistant) and the foreman at the scene. The progress of the cleaning should be followed, and the foreman or man in charge should be requested to call, at our expense,

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to ask any questions or to explain any difficulty that has come up during the work. After the cleaning, the man in charge should again be contacted by telephone, or otherwise, so that the customary tank cleaning report can be filled out by our representative (preferably the one authorizing the non-attendance). It is probably too much to expect that the entire report form can be filled out in detail from such a conversation but at least the principal questions on the form should be answered. After we in New York have had some experience with this method of operation, we may be more specific in this detail. Under "Remarks" on the report, it should be indicated that the tank cleaning was not attended but that the information was secured by telephone conversation, or other method, and from whom. Time and distance saved by non-attendance should be recorded.

The exigencies of the situation may be explained to authority and notification men when our representatives make routine calls. This particular phase of the work is now more important than ever. No campaign to tell our customers that we are making a reduction in the tank observation program should be instituted, as it is felt the policy of attending all tank cleanings is the proper one for our company and that we will maintain it to the best of our ability. Obviously, then, we are not trying to accomplish any percentage reduction or any specific saving in money, but are merely endeavoring to be assured that all the leaded gasoline storage tanks cleaned by the industry are cleaned safely, taking into the consideration the conditions in which we find ourselves operating today.

The above is the basic outline to be followed in the now modified program. This is somewhat general in nature - detailed instructions to cover every condition that may conceivably arise probably could not be written satisfactorily. The Safety Department in New York wishes to consult with you from time to time on the problems as they arise. While we feel our own responsibility has not been removed, greater responsibility devolves upon Division Managers and their staffs.

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