

December 13, 1926.

Mr. E. W. Webb,
c/o The Ethyl Gasoline Corp.,
25 Broadway,
New York, N. Y.

My dear Mr. Webb:

Your letter of December 10th enclosing Doctor Bricker's letter has been received. I should be very glad to cooperate with the Pennsylvania Department of Hygiene and Sanitation, and I shall answer directly all the questions which have been asked. I am very glad to see their interest in these matters as I think it will be decidedly beneficial in every way. I sincerely hope, however, that not all of the states express a desire to have our examination reports. In the first place I like to obtain as much in the way of confidential information possible in these reports, and I wish to hold them with the same professional privacy as would be used in the case of private patients. In the second place the matter of providing these records involves some considerable amount of clerical work, which I highly wish to keep at an irreducible minimum. I should much prefer making to them a report as to the particular results of any examinations which have been made, without providing them with complete copies of my records, and I sincerely hope that if any attempt is made to draw up such forms for reporting in these matters, that no such complete reports will be asked for.

Concerning the questions asked:- number one, the use of rubber gloves is, of course, for the purpose of providing a material impervious to tetraethyl lead. Cloth gloves in addition to these are desirable only as means of allowing a firm grasp of objects which are to be handled, as well as to prevent damage to the rubber gloves in lifting heavy things and in rolling drums. I should not be inclined to object if the management at any of our points wish to dispose of the cloth gloves, provided a proper inspection of the gloves makes certain that the rubber gloves are always in good condition. Our experience has been that the cloth gloves, however, are advantageous. Number two, I had advised the use of double lockers with one idea only in mind, namely, that the clothing belonging to the employee should not be hung in the same locker with his work clothing. The idea here, of course, is to make certain that there is no contamination of the clothing which the employee wears home. Therefore, if the clothing which the employee takes off before beginning the mixing job is hung outside the locker, I see no reason for requiring the use of another locker. In this connection we have attempted to explain to the management at the mixing points the thing which we are trying to accomplish by a given rule, and have asked for the enforcement of the spirit of our rules and the carrying out of the purpose for which they have

KE 0001336

Mr. E. W. Webb.

December 13, 1926.

been made, rather than to have a letter perfect adherence to them. Furthermore the inspections which are carried out both by our inspectors and by my assistants give us every assurance that the purpose for which the rules have been devised are being carried out.

The above applies equally well to the rule which has to do with the providing of clean clothing to be worn on every occasion on which mixing is done. As you know the clothing which is provided is white, so that it shows up any stain due to contamination with Ethyl fluid. I have given permission here and there for the wearing of the clothing on more than one occasion provided a responsible inspection of the clothing after its use gives assurance that there is no contamination with fluid. You will realize, I think, that with the development of improvements to our mixing equipment, contamination of clothing with fluid occurs only infrequently, and I have not wished to impose any unnecessary burden which is not justified by the facts in connection with the work. In the matter of shoes, the rules I think are specific in their request that shoes be especially provided, and that they be changed after the work of mixing is finished. I consider this an important rule for the reason that if any portion of the clothing is to be contaminated, the shoes will certainly be the most likely. I should insist, therefore, that special shoes be provided for this work, and that they are changed afterward, and that they be carefully inspected so that there will be no possibility of absorption of lead into the leather of the shoe and subsequently into the foot of the wearer.

I have been lead to believe that in one or two places a strict enforcement of the rules is not being carried out. For example, a somewhat more important matter than any of these has often been neglected, namely, the wearing of masks at the time the bung is removed from the drum, during the introduction of the pipe and fittings, and I have found that one or two of the inspectors were not even aware that this was required specifically in the rules and regulations. I think it is well for every member of the department of Inspection to keep himself familiarized with all the details of the rules, and I think it highly advisable that no change should be made from that which is written down in detail, except as specific permission to do so is given either by myself or one of my assistants. I do not believe that we can afford to be the least bit lax in these matters, for as time goes on, there will be a tendency to omit and to change them so that eventually the rules as prepared will be almost worthless. I feel that one of the principle duties of our medical department is to see to it that the rules as they have been laid down are carried out in even the small details, for in no other way can they be kept alive over a long period of time. Wherever changes become necessary or justifiable, because of the improvement of the conditions and mechanical equipment, the written rules should be modified accordingly, but until such modifications are made they should be carried out carefully. On the other hand, wherever any improvement in technique can be made, I should like to see it done, but I should like to have it brought to my attention so that it can be duly recognized and incorporated in our methods.

In relation to all of these matters. Mr. Walter suggested to me

KE 0001337

Mr. E. W. Webb.

December 13, 1926

when I was in New York, the advisability of having a second meeting of the mechanical and medical staffs to discuss all of these matters in exactly the same fashion in which they were discussed at our last meeting in August. I think this is a good suggestion, but I feel that it is not immediately necessary to do so. The rules and regulations were devised for the purpose of taking care of any emergency which might arise and were prepared more with the idea of taking care of the situations which would arise in connection with the somewhat unsatisfactory pumping devices, than for the greatly improved eductor system. I feel that our most urgent need is not the changing of the rules and regulations, but is rather a complete doing away with all of the systems of mixing which we recognize to be unsatisfactory. I do not feel that modifications of the rules and methods of handling are indicated until this has been done.

I believe that the above will serve to make my point of view about all of these matters perfectly plain.

With kindest regards.

Very truly yours-

KE 0001338

ETHYL GASOLINE CORPORATION**25 BROADWAY****INTER-OFFICE
CORRESPONDENCE****NEW YORK** December 10, 1926.

Dr. Robert A. Kehoe,

Dear Dr. Kehoe:

Enclosed is copy of a letter received today from Dr. Bricker.

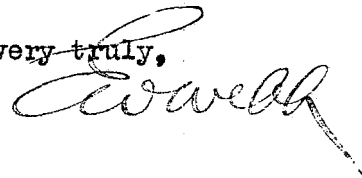
I take it that we are not only willing but pleased to fully cooperate with Secretary Lansburgh's suggestion about filing all reports of the examinations of the mixing men. It would impress me as the better plan for us to transmit from this office - or your office - directly to the Department copies of the examinations of the men working in Pennsylvania.

Frankly, the interest manifested by Dr. Bricker is the sort of thing that may prove very helpful, dependent upon the ability and honesty of such investigations. I do not, of course, question the good motives in this case, but have in mind the possibility of this kind of work being taken up just as actively in some other states. Earnest and well intentioned cooperation, properly handled, might well turn out to be constructive; it should have the effect of keeping our customers alive to the fact that their way of handling the business is being checked by a state department, which is using your handbook on Rules and Regulations as the guide in handling the concentrated material and that of the Surgeon General for Ethyl gasoline.

Kindly let me have your views relative to the various matters referred to by her and how they should be answered. I do not wish to place any interpretation upon your rules other than the language clearly imparts, nor to suggest any modification or sanctioning of any let-up on their enforcement unless I am fully advised by you to such effect.

An early reply will be appreciated.

Yours very truly,



EWW:CH

KE 0001339

COPY

DEPARTMENT OF LABOR AND INDUSTRY
Harrisburg

December 9, 1926.

Mr. E. W. Webb,
President, Ethyl Gasoline Corporation,
25 Broadway,
New York City, N.Y.

Re: Companies Mixing Ethyl Gasoline.

My dear Mr. Webb:

This is in reply to your letter of November 24th supplying me with information concerning plants mixing ethyl gasoline.

Your previous letter giving me the names of the establishments in Pennsylvania doing mixing contained the information I asked for at that time. This Department is particularly interested in the gasolines containing tetraethyl lead and the knowledge that such fuels must be sold under your trade mark will be very helpful to us in checking up on conditions in Pennsylvania.

During the summer, the Atlantic Refining Company advised us that they were about to put on the market ethyl gasoline. I have made several visits to their mixing plant and have found them to be very cooperative in supplying this Department with all information and assistance asked. They are now sending to us regularly the reports of the physical examinations of the men employed in their mixing plant which reports I understand are obtained from your organization.

During the past ten days I have visited the other plants in Pennsylvania doing mixing :- Pennzoil Company, Oil City; Waverly Oil Works, Pittsburgh; and the Sterling Oil Company at Emlenton, Pa. I had hoped to arrange with these companies to have sent to this Department the records of the physical examinations you are making of their men. In each instance however, I was told that they receive no detailed report from you. Secretary Lansburgh is very anxious that this Department have on file all reports of the examinations of these men. The companies just mentioned, all stated that they would be glad to have you furnish us with copies of the reports, or if you prefer to supply them with the copies, they will see that they are forwarded to this office. Will you kindly let me know what procedure would be most convenient for your company to follow in this matter?

In visiting the plants in Western Pennsylvania, I found that working conditions were not so good as in the plant of the Atlantic Refining Company, Philadelphia. I am therefore writing you to learn how you interpret certain rules contained in the pamphlet entitled Rules and Regulations Governing the Handling of Ethyl Fluid. Specifically these points are: Rule 9 page 1- Rubber gloves covered with cloth gloves with leather palms. I found that the Atlantic Refining Company upon my last visit, uses a very heavy grade of rubber gloves and omits entirely the use of cloth gloves. I presume that this deviation was satisfactory to you, but shall be glad to have your confirmation of this opinion.

In several plants I found that Rule 10 page 2 was interpreted to require lockers only for the clothing worn by the men in mixing ethyl gasoline, their other clothing being hung on hooks in the dressing room while the mixing clothes were being worn. Another point in this rule was the providing of clean clothing to be worn during the mixing. As I found it, this rule is being interpreted that so long as no ethyl fluid is spilled or touches the clothing which

KE 0001340

Mr. E. W. Webb

#2

the men wear, it is worn again without being laundered. I presume that it is your desire and that your instructions are that workmen doing the mixing should change their clothing completely before and after such mixing is done. If so, does this include the changing of shoes?

Your explanation of these points will be very helpful to our inspectors in their visits to these plants.

The Atlantic Refining Company has developed a system of instructing their service station employees with regard to the precautions to be observed in the handling of ethyl gasoline, which Secretary Lansburgh thinks is very desirable. We are developing similar methods by which service station employees selling all types of ethyl gasoline may be similarly instructed. The companies above mentioned approve of this plan and have expressed their willingness to cooperate with this Department in this matter. I should like to take this proposition up with the corporations distributing Fleetwing Ethyl, United Ethyl and any other companies distributing ethyl gasoline in Pennsylvania.

I shall therefore be much indebted to you if you will advise me where the above named products are being mixed in order that I may write those companies direct.

Appreciating very much your continued cooperation, I am

Very truly yours,

Elizabeth B. Bricker, M.D.
Chief, Hygiene and Sanitation
Section.

EB:S

KE 0001341