



COPY

HWK-47

May 28, 1941

TO ALL DIVISION MANAGERS

Gentlemen:

A month or two ago, we began to receive certain reports in this office which indicated that there seemed to be a growing belief on the part of some division managers and field men, that we might be unjustified from the viewpoint of expense and man hours in following our existing program which calls for observation of the cleaning of small bulk storage tanks. I think the reasoning back of this feeling was two-fold: first, that no known serious accident has ever taken place in one of these small tanks, and secondly, that certain tank cleaning contractors have for a period of years cleaned tanks without apparent harmful results while using only the most meager precautionary measures. Some of our people reasoned that if the employees of these tank cleaning contractors did not become ill in doing the job in a manner very much at variance with our precautions, it should be unnecessary for us to insist that our regulations be strictly adhered to.

Because this feeling found its way to New York from several independent sources, we thought it wise to have a meeting wherein the problem could be discussed by Dr. Kehoe with a group of us here in New York. Accordingly, this discussion took place last Wednesday and we give you here-with the salient points of our conclusions:

(1) Basing our policy on the only positive knowledge we have, we feel that we cannot, at this time, agree to any relaxation in observing the cleaning and repairing of small tanks. By that I mean the study which was made by the Medical Department indicates beyond a shadow of a doubt that sufficient quantities of organic lead may occur in these tanks whereby workmen who fail to adhere to certain precautionary measures may acquire illness of a severity which may be fatal. The very fact that we know these conditions may exist makes it impossible for us to change the attitude which has been expressed to you verbally, by letter, and in the Safety Manual, during the past year.

(2) You will be interested, however, in the fact that further experimental work is continuing at Cincinnati on these problems, it being too early to forecast any positive information at this time. The Medical Department also intend to make some additional studies to determine the tendency of individuals to absorb lead when cleaning small storage tanks without observing proper precautions. We are hopeful that we can establish the proper contact for this study through a tank cleaning contractor who is not convinced of the necessity for our precautions and consequently has refused to follow them.

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The main purpose of this letter is to assure you that it is the considered opinion of those charged with the direction of safety activities that observation of tank cleaning and repair is necessary to guard against any possibility of hazardous conditions, and the company still considers that the time and expense consumed by the field staff in this activity, as well as research work in the Medical Department, must go on.

Very truly yours,

Signed: H. W. Kaley

MR

KE 0022776