

November 6, 1936

Dr. Graham Edgar
Ethyl Gasoline Corporation
Chrysler Building
New York City
New York

Dear Graham:

I am forwarding to you herewith various exchanges of correspondence with Dr. B. B. Reeve, Medical Director of the Standard Oil Company of Indiana.

Some time ago it came to my attention that the Indiana Company was issuing instructions to all distributors of gasoline containing tetraethyl lead, in which they were making use of the type of regulations which were originally employed in our book of regulations. Apparently from Dr. Reeve's letter, such regulations have been in force during the entire time in which they have been handling leaded gasoline. However I was somewhat surprised to find them in this form since I was not aware that any of the distributors were using a warning sign of this type in refineries, filling stations or elsewhere. Regarding them as essentially new, I wrote Dr. Reeve asking for the reasons for the issuance of such regulations.

About this time the letter from the attorney in Milwaukee was referred to me by you and this incident raised the question in my mind as to whether or not it is wise to have instructions in effect at present which apparently call attention to specific dangers associated with leaded gasoline. I have continued the correspondence with Dr. Reeve and have carried the matter as far as I can well do it in view of the last reply of Dr. Reeve.

Obviously I am not opposed to the use of these regulations on the part of the Indiana Company. There is nothing about them from a factual point of view which is objectionable and there are, of course, good reasons why gasoline in general should be handled as carefully as may be. On the other hand I felt it wise to remove any regulations for the handling of leaded gasoline from our book of regulations, and for reasons which are discussed in my letter to Dr. Reeve. I see

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no reason at the present time why specific instructions should be used in the case of leaded gasolines. Moreover I can cite several instances which have come to my attention in recent years, and in particular the recent case in North Carolina in which the existence of such regulations as these provided a legal implication that leaded gasoline was inherently dangerous because of its lead content. There are no evidences which substantiate the existence of such inherent dangers, and I do not consider it either good policy or wise hygiene to talk about dangers which are apparently non-existent. The only effect of such regulations is to make the author somewhat ridiculous in the minds of the workmen whose experience has shown them that the precautions are unnecessary.

It appears to me under these circumstances that this issue should be clarified with the Indiana Company, and with any other companies that might be in a similar situation. I am not in position to discuss the matter of contracts with Dr. Reeve or with anyone in the Indiana Company. Moreover I do not want to take any action in such a matter as this since it is rather a matter for the executives of the Corporation to settle. I suggest, therefore, that you take up the matter with Mr. Webb, if need be, or that you do whatever it seems necessary or wise to do in this connection, letting me know what action is taken. I would be glad if you would return Dr. Reeve's letters to me when they have served your purpose.

Very truly yours,

RAK:is

Robert A. Kehoe, M. D.