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ETHYL GASOLINE CORPORATION

SAFETY

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SAFETY

On considering the safety problems of our company I believe that there are two points which should be stressed. The first is that our Medical Department has issued regulations governing all of the recognized dangerous phases of our business and although we are all appalled by the recent trouble at Savannah and although none of us has any intention of minimizing hazards in the cleaning of leaded gasoline tanks or in other hazards in our business, still we have not encountered a new problem but we have had our attention definitely focused on one which has been already recognized. Second, because of the suddenness of the recent tragedy I do not believe we should hurriedly rush into any program without a thorough study of our problem so that the program adopted will most capably carry out the work to be accomplished while at the same time being efficient and workable from an organization standpoint and not unnecessarily costly as a result of duplication of personnel.

In approaching the question, because of the dangerous nature of our product, it will be necessary to follow the course of Ethyl fluid from its manufacture to the time the leaded gasoline is consumed. In doing so I shall endeavor to emphasize those phases which require immediate attention as against others which from all existing data are not so important.

(1) As a result of our experience early in business and close supervision since then, the manufacture, blending, drumming and shipping of our product are being capably handled by our Manufacturing Department. Drumming---probably the most hazardous operation---should be considerably reduced as a result of freight prepayment and the shipment of probably 95% of total fluid in tank cars.

(2) Reshipment of fluid can be capably handled through the services of the recently appointed employees on the Gulf and West Coasts. Because of the necessity of coordinating their activities with fluid shipments I believe that these men should be retained in the Manufacturing Department as the ever present and fearful possibility of the bursting of a fluid drum (when the shipment has once left Deepwater) can happen only upon the arrival of the shipment at its first destination. Prepayment of freight will almost entirely eliminate this hazard.

(3) Mixing point inspection. The recent tour of Mr. Lewis and Mr. Schaefer indicates not only a lack of uniformity in mixing installations but that our medical requirements are not being adhered to either in the construction and/or operation of many plants. The appointment of one or more safety representatives in each division with full responsibility over these installations and with the support of the New York office to withhold shipments where we are unable to secure cooperation should bring about the correction of this situation within a short time. Prepayment of freight will also result in the changing over and standardization of many installations. The safety representative will also be responsible for the use of concentrated fluid at refinery laboratories.

(4) Cleaning of blending tanks and leaded gasoline storage tanks at refineries. This work is most important and requires the immediate attention of the safety representative, it being his responsibility solely.

(5) The cleaning of former blending tanks. Our experience at Savannah and also in Massachusetts would indicate that probably a more serious hazard exists in such tanks than in storage tanks into which blends have not been made. A survey should be conducted to find out the location and number of such tanks, samples of scale being analysed by the Medical Department. In this connection it would be advisable to determine how lead scale is present on the roofs of such tanks. This work probably will be jointly handled by the safety representative, Sales Department representatives, and the Medical Department, future inspection being carried on by field representatives.

(6) Cleaning of tanks at terminals. Because of the tremendous number of these tanks both along the seaboard and at river points, I believe that the securing of samples of scale and a determination of how our regulations are observed will have to be made by the field force. Our Medical Department would advise us as to possible hazards which may result from lengthy storage of large quantities of leaded gasoline, the field force carrying out future inspection.

(7) The cleaning of bulk plants. A study of this problem is so extensive that it must of necessity be undertaken by the entire field staff. Of course, the division safety representative can approach head offices to find out if regulations are being followed at company owned bulk plants, but inspection of these plants and those of jobbers will be a function of the entire field force. The Chairman of the Safety Committee will see that suitable notices are sent to all refining licensees and jobbers in quantities sufficient to take care of all bulk points.

(8) Cleaning of service station and dealer tanks. Hazards in connection with this must be determined by the Medical Department before dangers involved in it are known. If an investigation must be made to find out what becomes of sludge, scale, etc., pumped from the tanks, it will require the services of the entire field force.

(9) Sale for use other than as a motor fuel. Should an investigation of this be desirable, it will be a function of the entire field organization.

(10) Repairing and welding of tanks. Regulations should be issued by the Medical Department as to how it is possible to weld a tank while wearing both a gas mask and an eye protector. I believe a combination unit could be developed but a survey on this again must be a function of the field force.

(11) Repairing of pumps. I have not seen the results of the survey on this but believe that it will require the entire field force to contact pump manufacturers and the repair shops of our customers and jobbers.

(12) Warning plates. Proper placing of warning plates is a function of the Safety Committee and should be handled by its Chairman. The entire field staff must be utilized in this.

From the above resume, which I have treated from a personnel standpoint and with a full realization that my suggested handling of the various phases of our business may in many cases not be in accord with the overriding decision of our Medical Department, it can be seen that our problem is extremely complex. It breaks itself down into two main divisions---first, where concentrated fluid is handled

(which seems to be entirely a function of the Safety Committee and its representatives), and second, from where the fluid is mixed with gasoline. Supervision over the entire problem should be the responsibility of the Safety Committee but the two above mentioned divisions are so closely related that I do not see how we can do an effective and a fairly rapid job unless the work of the Committee is intimately connected and to some degree a part of the ordinary routine work of the Sales Department.

For this reason I wish to recommend the following procedure.

The appointment of a Safety Committee to consist of a representative of the Medical Department, the Manufacturing Department and the Sales Department---Mr. O. B. Lewis, Assistant Sales Manager, to assume, in addition to his other duties, the active chairmanship of the Committee. Letters to our customers and to Division Managers on the subject of safety will go out over his special letterhead as Safety Committee Chairman.

I recommend the appointment of one safety representative in each of our divisions, with the exception of Chicago, Los Angeles, New York and Tulsa, where two will be appointed. These men will be entirely divorced from all other Sales Department duties. The Division Manager will turn over to them copies of all letters on the subject of safety, they following these matters up with our customers. They will be individually responsible to the Division Manager for the phases of our business where concentrated fluid is handled. They can secure results without the handicap of being working on sales promotion, etc., at the same time.

I have suggested that an Assistant Sales Manager be Chairman of the Committee and that he work through our Division Managers, the safety representatives being under the Division Managers, for the following reasons.

(1) The set-up is a normal one for the company. All special divisions of our work, such as the direction of special automotive men, special tractor men, sales promotion meetings involving more than one division, are handled through the appointment of an individual in the New York office to supervise the work, he carrying on through the Division Manager to the field representative.

(2) It is impossible for one man in New York to direct effectively a group of men all over the country. Distance and time make this impossible. Active supervision in laying out work is required and unless we have been wrong in our appointment of Division Managers, they should be responsible for all field activities---including safety.

(3) No field representative is familiar with an entire division. Division Managers are, and quicker results can be obtained through the coordinated efforts of a Division Manager and the safety representative than can be obtained by placing responsibility on the latter alone. This applies not only to knowledge of the country but of customer personnel.

(4) In view of the fact that, as above indicated, so many of the problems must be handled jointly by the safety representative and the field force, the

responsibility should not be divided but should be placed in the hands of the Division Manager, he directing the safety representative where his work alone is required and both the safety representative and the field force in a joint problem.

(5) From the standpoint of securing results but at the same time in not wasting money, I believe that the supervision of the Division Manager is required in checking expense accounts, requisitions for material, automobile purchases, repairs and trade-ins, etc. This cannot be adequately supervised over the entire country by one man in New York.

(6) With a relatively small increase in the number of men in the field, I can see no reason for the setting up of a new department with what I consider unnecessary accounting expenses. It is impossible to separate the functions of such a Safety Department and the many safety activities which must be participated in by the rest of the field organization and which cannot be assessed against the new department, or the Sales Department alone.

I furthermore believe that because of the recent accident (and again without minimizing the hazard) we are emphasizing too much the work to be done. We most certainly do not wish to become so active that the entire industry will be frightened to death about the use of lead in gasoline---they passing their fears on to the public. I also believe that most of these hazards, which have gone along to a considerable degree neglected over a period of ten years, can be corrected within a short time, and that with prepayment of freight and an intensive campaign correctly directed at this time, our safety work could be carried on under the normal supervision of our field staff, particularly when the importance of this work has been brought home as it doubtless will be. With only the direction of this activity from New York, we would not be faced with disbanding a new department.

I believe that we should consider the question of advancement. With the exception of the Committee Chairman, field representatives will see little chance for advancement if they are taken from the Sales Department and placed in a Safety Department. They are all working for advancement in the Sales Department. They see ahead promotions to Assistant Division Manager, Division Manager, etc. While all of them will follow orders, I am firmly of the opinion that many will recognize the temporary nature of their work and that a transfer to a new department might mean the loss of a year's work on routine field representative duties and a possible loss of a chance for advancement---which would not be the case if they were immediately under the eye of their Division Manager.

The above has been hastily dictated the day before our Cincinnati meeting but I believe that the ideas and arguments which I have submitted deserve the careful attention of those present at the meeting.

J. C. Taylor