

November 23, 1929

Mr. A. E. Mittnacht,
Ethyl Gasoline Corp.,
25 Broadway,
New York City.

Dear Mr. Mittnacht:

I received your letter of November 19 following receipt of a letter from Mr. Stover containing a copy of the letter of Colonel Dunn in regard to the drums and their gasoline content. I see no reason for taking any further action in this matter. If the Bureau of Explosives is satisfied, I am quite certain I am.

One matter arose in connection with my last visit about which my conviction has deepened. I am satisfied that the shipping of Ethyl Fluid is being handled in the best way it is possible to handle it at this moment under the unusual conditions of sales at this time. I am not satisfied, however, that everything is being done to contribute to the safety of operation, for the reason that there is no adequate testing of drums for leaks at the blending and shipping plant. I can not but feel that the circumstances which have compelled us to abandon the testing of these drums is one of the worst items in our entire program. It is very fortunate that there have only been a few accidents, but I am quite certain that if anything serious occurred it would be indeed a lame excuse to say that the necessity for shipment has been so great that no proper testing of drums has been able to be carried out. If anything occurred the Ethyl Gasoline Corporation would receive strong and just criticism for being willing to send out in ordinary carriers a mixture of material as toxic as those in Ethyl Fluid without any testing whatever to determine whether the drums are satisfactory or whether there are leaks in the seams or bung. I am afraid that I have been guilty of some negligence in not having been insistent upon the necessity of at least testing these drums over night. I know that in many instances drums are filled at the drumming booths, bunged, rolled back into the shipping room, and immediately shipped out. It is my feeling that we should say definitely from now on without any regard of its effect upon business and shipments, that no drum may be shipped out without at least standing over night. It is my feeling also that the drums ought to be capable of test in some fashion or other to determine the existence or absence of leaks, before the Fluid is put in them.

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Mr. Mittnacht -2-

I am not in position to say what such a test should be, for I do not know what would be the best effective and suitable test. I am sure, however, that information on this point could be obtained from proper sources. It is entirely likely that the people who manufacture drums have means of testing them that would be entirely satisfactory in our hands also. At any rate it is so obvious as to be trite that we should never send Fluid out in a drum that is not known in advance to be perfectly safe. There should be such a margin of safety that in the event of violence done to a drum it should be able to withstand a considerable shock without being broken or without being split at the seams. Now it should be possible, it seems to me, to establish a method of testing which would determine this point. In addition to this, since any method of testing is not entirely adequate, the drum should be filled and then allowed to stand under observation. Over night is the least possible time that should be used for this purpose and I would recommend not less than twenty four hours. This introduces difficulties but it seems to me the difficulties must be overcome rather than run around.

There is no advantage that I can see in troubling about what has occurred in the past. As I have already said, I can not but feel that I am in part responsible for neglecting this matter. However, I believe that we should adopt for the future the policy that no amount of haste and no amount of commercial urgency may ever be allowed to interfere with this primary function on the part of the Ethyl Gasoline Corporation of protecting all handlers and the public against the bad effects which may come from accidents and mistakes in the handling of Ethyl Fluid. I should therefore make it a rule that no drum of Fluid is ever to be shipped out without having been subjected to the testing that I have described.

I would be glad if you would bring this notation to Mr. Webb's attention for I believe he will understand at once that whatever is necessary to make certain that there is no undue haste in the future in shipping Ethyl Fluid must be done.

Very truly yours,

RAK:EJ

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