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Mr. C. B. Lewis,
Babyl Corporation,
Chrysler Building,
405, Lexington Avenue, New York.

21st April, 1945

Dear Oscar,

Tank Cleaning

I wish to refer to your letter of 8th November 1944, especially with regard to the definition which you furnished on the vexed question of when is a tank "thoroughly cleaned" so that workmen can enter without air tanks.

I do hope you will not think I am being obtuse in labouring this point. We are, as you very well imagine, giving very serious thought to the handling of the tank cleaning side of our safety activities in the post war era. It is quite evident to us that the position is not satisfactory. For example, during my visit to Abadan I had a conference with the Works Manager in his office, at which about 12 of the senior members of his staff were present. We dealt in great detail with all aspects of the potential hazards of cleaning and repairs. As a matter of interest one of their engineers raised the point of a cracked bottom such as led to the incident referred to in your circular letter 3-6-45- and we were all in agreement as to how such a job ought to be tackled. There was no doubt at all in the minds of all present of the hazard and yet with all this appreciation and good will A.I.O.C. recently reported a fatality. The reason for this was a break-down in supervision of somebody down the chain, the job being actually a

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This is a vital point upon which to give direction to our customers.

By the above definition do you agree that a man could be sent into a tank with loose flaky scale being present on the walls above the sludge line and for subsequent hammering operations e.g. caulking to take place by men inside the tank without masks? Such work would generate a lot of dust with a triethyl lead hazard.

In my own limited experience I have found quite thick loosely adherent scale present on walls that could be prised off with ones fingers. A fire hose jet would however knock most of this loose scale away, leaving of course strongly adherent scale.

I would like to offer an alternative reading:-

"A thoroughly cleaned tank from a lead standpoint is defined as one which has had all sludge cleaned out and all loosely adherent material removed from the walls except that where hot work etc."

Coming down to earth - does a company requiring to do repairs to a tank bottom involving hammering etc. actually descale the walls first? If so to what extent and by what means? Obviously to require them to do so by scrapers would add enormously to the task. A fire hose jet would however deal with loosely attached flakes of scale which could give rise to dust.

I would be very grateful if you could cable me a reply on this question of definition so that we can be uniform in its dissemination from our various offices.

One final point, Dr. Kehoe saw fit to draw some differentiation between small and large tanks at the level of 50 tons capacity, in which tanks, fresh air hose masks are permitted in place of positive pressure masks. Is it your practice to supervise the cleaning of these small tanks in the U.S.A. through your own safety engineers?

Yours sincerely,

W. H. C. H.

Orig by steamer
copy by air mail.

Copy to DR. R.A.KEHOE.

KE 0015764