

ETHYL GASOLINE CORPORATION

MANUFACTURING DEPARTMENT

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December 19, 1934

Dr. Robert A. Kehoe,

Dear Dr. Kehoe:

I apologize for not replying more promptly to your letter of December 3 regarding the revised regulations for the handling of bulk mixing equipment. About the time I received your letter Mr. Mitnacht had me getting some special information for him and I just didn't get a chance to get into your request. Then, I had to go to New York and when I came home I was sick with the grippe for about a week so I am now just getting my feet on the ground again.

There is now in circulation a Rules and Regulations Handbook for tank car equipment, dated February 1, 1931. Reference to this will give us some sort of a background upon which we can make our comments.

I think that the general rules on pages 1 and 2 of this book are satisfactory excepting we may want to include the word "Q" Fluid as well as ETHYL Fluid, in order that there would be no confusion that the rules apply to all fluids regardless of trade mark.

The general rules on pages 3 and 4 also seem to go without further comment.

Special rules however for unloading tank cars should probably be re-worded so that they include tank trucks as well. The same procedure should be used in unloading Fluid and washing out the residue for both tank cars and tank trucks. Page 5, Item 5 in the booklet mentions the word "red stain". Since Fluid is now made in many colors specific mention of one color should be omitted to make the rulings general.

A few additional thoughts to be incorporated in the unloading phase are as follows:

When the dome is opened there should be no evidence of any stain. In hooking up a car or truck, none of the valves should be opened until the swing line and vent line have been connected. After the Fluid has been removed, both cars and trucks are to be flushed with gasoline, as outlined in Rule B on page 5. We might add at this point that the operator be absolutely sure that the flushing gasoline is also completely withdrawn. To determine that this has been done, after the vacuum drops open the vent valve which is not in operation ~~and connect it~~ and if there is a good vacuum

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evidenced by the rush of air through the valve, it is certain that the car is empty.

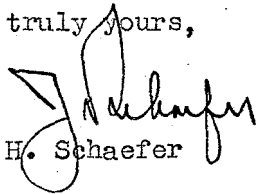
On each tank truck on the cat walk we have a bracket which contains a standpipe about 6' long. This should be put into one of the vent valve connections so that the tank truck venting will take place considerably above the operator's head.

Rule E of Section 2, page 6 states that under no conditions should any ETHYL Fluid tank car be used for any other purpose than for the transportation of Motor Fuel Anti-Knock Compound (ETHYL Brand). This should be modified to read, "for no other purpose than for the transportation of Motor Fuel Anti-Knock Compounds".

When you come to the question of revision of regulations for handling drum mixing installations, I would like a rule put in that would emphasize that all drums should be flushed with gasoline before the eductor standpipe is removed and secondly, that all of the flushing gasoline should be completely removed before the drum is re-sealed, being sure that both the inner and outer plugs are screwed down tightly. Also, it might be well to mention that when drums are empty they should always be returned to ourselves at Carney's Point, New Jersey, freight collect.

I should like very much to go over the new regulations after they have been drafted.

Very truly yours,


J. H. Schaefer

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