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February 26, 1990

Mr. John Braddy
Manager, Marketing Department
Petroferm Incorporated
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Fernandina Beach, FL 32034

TGG: JGL: EBT: MHH: AJO: RF

XF: 283.1

VISTA

Dear John:

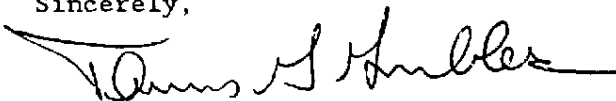
This letter is to provide further information regarding the disposal of LPA-210 through a POTW or septic tank system. My letter of August 7th provided general regulatory facts regarding these questions. This letter will add to those facts our speculation or opinions on these questions. These opinions are based on our knowledge of LPA-210 and comparison of it's properties to the environmental fate properties of Linear Alkylbenzene (LAB), for which information is available.

Specific to the question of the potential for LPA-210 to cause interference with the operation of POTW, we believe the following is true. LPA-210 would be adsorbed to sediments and sludges in a POTW system. This removal mechanism should prevent pass-through, and if the POTW is operated properly, no interference should occur. At expected concentrations, that being very low, in a normal sized POTW, LPA-210 should not reach concentrations that would be toxic to the "bugs" in the POTW. The recently obtained BOD data on LPA-210 indicates that the LPA-210 adsorbed to the sludges would biodegrade under aerobic conditions, that being normal operation of the POTW or when the sludge is removed and applied to land.

The above principles would apply to the operation of septic-tank systems as well. If LPA-210 was reasonably diluted in the septic system, probably in the 1 to 5 range, it is anticipated that no toxicity would occur on the septic system bugs. If high concentrations of LPA-210 became adsorbed on the sludge, the coating effect could reduce the efficiency of the system.

Once again, the above is based on our knowledge of LAB, a similar hydrocarbon, the BOD data obtained on LPA-210 and expected low concentrations of LPA-210 in wastewaters. Please contact me at 713-588-3445 if you have questions on the above.

Sincerely,



Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

dlj

cc: P. Douvry
A. M. Nielsen-Austin

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