

TO: Lester W. Sanders, Sr., M.D.

FROM: Robert A. Kehoe, M.D.

DATE: June 15, 1964

I am of the opinion that the exposure to lead which resulted in the illness of these men, as you have indicated, occurred within the tank. This opinion, however, from the aspect of the evidence (such as it is) that is now available, cannot be substantiated. Regardless of our basis in experience, therefore, the fact remains that one cannot safely conclude that the handling of the sludge had ~~Nothing~~ to do with the matter. Contrary evidence (of a sort) suggests otherwise.

- (1) First, it is maintained stoutly that the men followed instructions at all times.
- (2) The sludge was one of the highest in its content of TEL that has been seen - approximately 0.5 per cent of TEL in the samples analysed.
- (3) The analysis of the air overlying the sludge was done in such a manner (after the fact of the illness, of course) that it is impossible to guess the true lead content. The colorimeter gave the maximum reading on two occasions, and no effort was made to determine how far above this value the concentration might be. The second sample was obtained at a distance of two feet from the edge of the sludge platform in the direction of the wind. It cannot be said, even in terms of our experience, that this did not and could not give rise to a significant degree of exposure to lead (TEL vapor), for the reason that sludges containing such concentrations of TEL have been encountered rarely - very rarely - and moreover, they have not previously been handled as this was (in the weathering procedure).

It is not wise, for any reason of policy, or other purpose, to close one's mind to the possibility that the exposure to TEL in handling the sludge was the source of the difficulty in this instance. Too much is at stake to justify such a position.

Incidentally the determinations of the TEL in the sludge were made by two methods, one being that furnished by Ethyl Corporation. While one may quibble about precision, there is no reason to doubt that this sludge, in its relatively dry state, contained TEL in approximately the concentration of 5,000 p.p.m. At my request of Mr. Halbrook of the duPont Legal Department, certain additional inquiries are being made into the time spent by each of the three men (who became ill) within the tank, and in the vicinity of the sludge in transporting

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it and spreading it. This may yield little information, but again the yield may be important.

RAK:vr

Robert A. Kehoe, M.D.

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