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December 24, 1963

R. H. Armbruster, M.D.
Arabian American Oil Company
Attention: Medical Unit
505 Park Avenue
New York 22, New York

Dear Doctor Armbruster:

Correspondence concerning the "Disposal of Sludge from Leaded Gasoline Storage Tanks by Weathering" has come to me from the New York office of your Company. I was somewhat familiar with this general problem and its handling as proposed by Ethyl Corporation, without having any responsibility for the matter, since my retirement (in 1958) from the Medical Directorship of the Corporation. I was also aware of the observations and views of the medical and technical people of Associated Octel, with whom I have maintained a somewhat informal consultant relationship for many years. I proceeded, however, on receipt of your letter to look more closely into the matter, and to establish in my own mind, at least, the basis for the discrepancy between the two sets of results and the views concerning their meaning.

I find myself possessed of little doubt concerning the technical competence of the two groups, and therefore it seems highly probable that both sets of results are valid. I suspect that climatic (and perhaps other) factors may influence the outcome, and especially the time factor in the outcome of the weathering process. Accordingly, if I were to accept the responsibility for authorizing the use of this method for the disposal of the sludge at a specific site and for a set period of time, I should want to have some sound evidence by which to be assured. This may appear to be an excessive precaution, but I think, under the circumstances, it is good insurance.

On the basis of this view, I approve of the procedure proposed in your letter. I have discussed the matter with Mr. Cholak of our staff, who is entirely in agreement that we should provide every possible assistance to you and your Company. We shall be prepared to accept samples for analysis, in order to test the procedure in your hands. There may well be a problem of representative sampling of the sludge, as well as of the atmosphere, and if we are to carry out the analyses, I consider it desirable beforehand, that an agreement as to these procedures and the cost of our participation be reached, between your people and ours. It is not easy at such a distance to work effectively, and as much coordination of effort as may be possible should be achieved.

Mr. Felix Pretsch visited us some days ago and discussed various aspects

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of the matter with me and Mr. Cholak. I am sure that our mutual understanding of the matter, and our joint professional concern, will make for a satisfactory collaboration. We shall hold ourselves in readiness to do what we can to clarify this somewhat unfortunate situation. If your people should decide, however, that the procedure is too uncertain to be employed even in a test, no harm will have been done. It is my opinion, for what it may be worth, that, considering the practical importance of the procedure, it is worth investigation in the specific instance. I cannot condemn the conclusions arrived at by people in Ethyl Corporation whose competence and judgment are well known to me, because of the divergent results obtained by Associated Octel. I suspect, however, that not all of the conditions have been examined, and that there is need of more evidence.

Sincerely yours,

RAK:vr

Robert A. Kehoe, M.D.

cc - Mr. T. J. Faughnan - Attention: K. Robinson

Dictated but not read.

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