

ETHYL CORPORATION
100 PARK AVENUE
NEW YORK 17, NEW YORK

October 10, 1960

Product Service Circular
Letter No. PS-22-60

Subject: Sludge Weathering -
Monitoring

Reference: Product Service Safety
Manual Section XI

TO REGIONAL MANAGERS

COPY FOR _____

Gentlemen:

In Letter PS-18-60 it was stated that as part of our test program on sludge weathering disposal, we need to check the sludge that is being weathered at our customers' locations. This letter is to give you specific instructions for doing this checking.

Sludge samples should be taken and analyzed at these times:

1. When the sludge is first removed from the tank for weathering, or as soon afterwards as possible.

2. Four weeks (⁺ a few days) from the time it is first spread.

3. If the sample taken after four weeks of weathering has a lead content of .002 Wt.% (Hellige Comparator reading of 2 using new Lead-In-Soil analytical procedure) or less, no more samples need be taken. If it is .003 Wt.% or more, additional samples should be taken and analyzed at approximately two week intervals until the lead content of the sludge drops to .002 Wt.% or below.

At each of these times three sludge samples should be taken and analyzed in order to confirm the findings.

In addition to the sludge sampling and analyzing, two Lead-In-Air checks should be made at the same time. The air samples should be taken at a point 4" above the surface of the sludge in the middle of the largest patch. If this sample should give a reading of four or more on the Hellige Comparator other samples should be taken to determine the boundary of the contaminated air. (It is not expected that a 4 reading will be found, but if it is, it is important to follow this instruction.)

The analysis of sludge samples is to be made using the new Lead-In-Soil kits and the "Analytical Procedure - Determination of Organic Lead In Soil" dated September 29, 1960.

The material for these kits and the analytical procedures were distributed to the Chief Product Service Engineers on October 10, 1960. Arrangements for using these kits should be made through your Chief Product Service Engineer.

In order to get a good representative sample of sludge after it is spread for weathering, the following procedure should be followed:

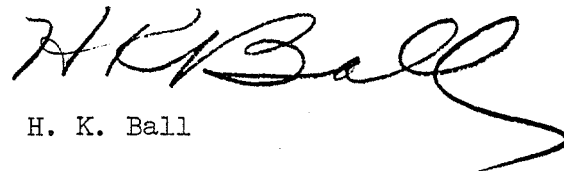
Take some sludge from 12 different points over the entire patch of sludge. At each point, try to get material from the top, middle and bottom of the sludge layer. Thoroughly mix the material taken from these 12 points in a bucket or other container. The required amount of sludge for the analyses can then be taken from this composite mixture.

Whenever the weathered sludge analyzes .002 Wt.% organic lead or less, it may be considered safe and the sludge may then be treated as any other non-hazardous waste material. Until the lead level is reduced to this point the sludge area should be roped off and treated as described in the sludge weathering procedure in the Note on Mixing and Handling, "Simple Procedure for Disposing of Sludge From Leaded Gasoline Storage Tanks", which was distributed in September.

We want to watch all sludge weathering for a while until we get some field experience and data, therefore this program will not continue indefinitely. Please notify your Chief Product Service Engineer of any sludge weathering that is scheduled in your area and keep him informed of the progress of the test. At the completion we would like a report by way of the Chief Product Service Engineer of all of the analyses and pertinent data, such as the general atmospheric conditions and temperatures during the weathering.

Please keep in mind that this is a voluntary program. If for any reason, customers do not choose to dispose of sludge in this manner they, of course, may continue to bury it.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'H. K. Ball', with a long, sweeping horizontal stroke extending to the right.

H. K. Ball

DRK:gn