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Dear Jim:

In the matter of the disposition of sludge, as discussed in your "Interview Report" of September 12 (Mr. Kasalka, Perth Amboy, New Jersey), my opinion continues to be that the inactivation of sludge from storage tanks used for leaded gasoline (inactivation from the aspect of a potential lead hazard) is not feasible. If it were, I should advise the application of such a method to the sludge within a tank before its removal and before it is mixed with water.

The situation which gave rise to this discussion, however, is a real one, and it seems certain that this situation will arise more frequently in the future than it has in the past, i.e. the disappearance of suitable space for the burial of sludge. The possibility of the use of a concrete tank as an initial receptacle presents the possibility of a relatively long-term settling and chemical treatment process, and in my opinion, this has real possibilities. Our people at the manufacturing plants (Houston in particular) have a waste handling plant which works, and the adaptation of the methods used in it, to the problem at refineries, possibly on a slower, smaller and more economical basis, seems to me to be worth investigation. We might well collaborate with some conveniently located customer in an attempt to solve this problem satisfactorily. Our efforts to learn something about the time (and other) factors in the decomposition of the organic lead compounds in buried sludge have been entirely unsuccessful, but they would not continue so necessarily under the presumably controlled conditions established by storing the sludge in a concrete (or other type) vessel. We might well find that we can establish the rate of the inactivation of such sludge, and we may be able to accelerate it by appropriate technical means.

I look with disfavor on the dumping of sludge in the sea, not only because of the limited applicability of the procedure, but also because the principle is not good. In the long run we must come around to waste disposal by sound technical methods.

Sincerely yours,

NAK:vr

Robert A. Kehoe, M.D.

cc - Mr. H. K. Ball
Mr. J. C. Watt

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