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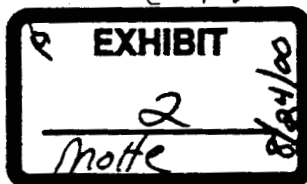
Dear Gene:

I appreciated the opportunity we had to discuss the Maine Department of Environmental Protection's (DEP) paper on MTBE in groundwater. We have been following this matter closely and have enlisted the help of the API and the Oxygenated Fuels Association (OFA) in monitoring the situation. Our view is as follows:

- o The authors of the paper don't represent the views of the DEP policymakers in Maine.
- o DEP policymakers have been contacted. Given MTBE's low toxicity, they don't consider MTBE to be especially hazardous. In fact, its odor characteristics were cited as a benefit in locating leaks quickly.
- o Technically responsible parties, such as the API and others, have provided comments to the author, the National Well Water Association, and the Maine DEP concerning the inflammatory nature of the remarks made in the paper and the lack of technical data to support the rather strong policy statements.

With respect to technical points made in the paper, we have the following comments:

- o The author's major thrust -- the theory that MTBE acts as a cosolvent to solubilize more BTX into the groundwater is simply wrong. I have enclosed two studies we have in this area that clearly



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support our position.

o We don't have any data to refute comments made in the paper that MTBE may spread further in a plume or may be more difficult to remove/clean up than other gasoline constituents. We will be working to develop data in this area, either ourselves or through industry groups such as API.

Our overall view is that the Maine paper isn't likely to receive any additional attention by regulators in other states. The poor technical job done by the authors has probably hurt their credibility with interested parties who have already seen it. Also, while some data on the effects of MTBE in underground gasoline leaks is incomplete, the characteristics of MTBE suggest that it doesn't represent a differential hazard to other constituents found in gasoline.

Please feel free to circulate this letter and/or attachments to interested parties within WOGA. Let me know if I can be of additional assistance.

Very truly yours,

George J. Yogis
Manager, Refinery Economics & Bus. Dev.

GJY/hlp

cc: R. J. Christie (w/o att.)
J. C. Lyons "
W. S. Whitney "
Group Circulating File "

ATTACHMENT

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