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June 11, 2007

Via U.S. Mail and Facsimile at 214-665-6660

Mr. Carlos Sanchez
Remedial Project Manager
Superfund Program (6SF-AP)
U.S. Environmental Protection Agency
1445 Ross Ave.
Dallas, TX 75202-2733

Re: Palmer Barge Line Superfund Site, Port Arthur, Jefferson, Texas ("Palmer site")

Dear Mr. Sanchez:

I represent Higman Barge Lines, Inc. ("Higman") which was recently served with a Unilateral Administrative Order ("UAO") regarding the referenced site. The UAO requires respondents, including Higman, to commit to implementing the RD and RA by June 11, 2007. Higman continues to insist that the UAO should be withdrawn, as applied to Higman, for the reasons identified in my June 7, 2007, letter to Mr. Sam Coleman, P.E. (Copy enclosed). Higman has not been shown to be a PRP.

Higman's response to paragraph 29 of the UAO is as follows. Higman is in discussions with Mr. Carl Everett, the representative of the PRP group identified at the May 31, 2007 meeting with EPA, leading to participating in performance of the RD and RA. That participation is, however, with full reservation of Higman's right to challenge the UAO and its applicability to Higman in every appropriate fora, including recovery of costs so expended from appropriate sources including but not limited to the Superfund in accordance with Section 106(b) of CERCLA (42 U.S. C. 9606(b)) and from other PRP's as appropriate

I and other representatives of Higman are available to discuss the matters contained herein, at your convenience.

Sincerely,



Harless R. Benthul

EXHIBIT 8