

TO: Chuck Putnik

FROM: Tom Grumbles
DATE: August 24, 1984Interoffice
CommunicationSUBJ: CUSTOMER REQUESTS FOR ETHOXYLATE EXEMPTION
DATA

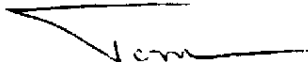
VISTA

I have reviewed the requests from Onxy and Purex. A copy of the applicable portion of the regulation referenced in the letters is attached. As you will see this section speaks to the "potential to release EtO in airborne concentrations" exceeding the action level of 0.5 ppm as an exemption criteria. As we have discussed in the past EtO residuals in ethoxylates can result in vapor space concentrations exceeding 0.5 ppm, however, we know that from our workplace monitoring that the levels we currently have do not create exposures of concern. Therefore, a key issue is the interpretation of paragraph (a)(2) in the standard.

I have discussed this with Bill McClain in Legal. We three, and whoever else you feel should be involved need to meet and discuss our response. Based on Bill's schedule, I would propose sometime Wednesday. Please let me know what time is good.

Following are initial discussion items:

1. Interpretation of paragraph (a)(2).
2. What constitutes "objective data" for the customer.
3. Content of customer responses.
4. Customer response - as asked vs. all customers.
5. Product liability concerns as related to the above and duty to warn.


Thomas G. Grumbles

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cc Bill McClain
Sid Pitts