

~~44-102-100~~ (E)
RE: SLAR

TO: Mike Abadi

FROM: Tom Grumbles
DATE: June 25, 1985

Interoffice
Communication

SUBJ: MURIATIC ACID FOOD GRADE STATUS

VISTA

Enclosed is the letter we discussed regarding the Food Chemicals Codex specification for by-product acid organic contaminants. As we discussed, at this point in time we can only say that our acid meets the total organic and benzene specification levels as defined in the new edition of Food Chemicals Codex.

Hopefully, FDA will accept this specification when making their final determination on the GRAS status of by-product acid.



Thomas G. Grumbles

ajo/007

Enclosure

VVV 000016862

24-20
RE: 1412-A, 1412-S
AND SDA

TO: W. J. B. Vogel

FROM: Tom Grumbles
DATE: June 24, 1985

Interoffice
Communication

SUBJ: SDA AD HOC COMMITTEE: ALCOHOL ETHOXYLSULFATE HAZARD
CLASSIFICATION

VISTA

The subject meeting was held on June 21 at SDA. Representatives from Shell, Proctor & Gamble, Texize, Monsanto, GAF and SDA attended.

The basic issue was the DOT exemption for aqueous solutions containing less than 24% alcohol. These solutions have measured flash points below 100°F which puts them in the flammable liquid classification. However, DOT allows them to be classed as combustible liquids for classification purposes. Shell had raised the issue of whether this exemption was appropriate based on the actual hazard of the materials.

The collective experience of those attending was that the combustible classification appropriately describes the hazards of affected materials. In our case 1412-A and 1412-S. To reclass these materials as flammable would have impact on the following areas:

1. Container labeling: combustible liquids in containers less than 110 gallons are exempt from DOT hazardous materials regulations.
2. Transportation logistics: for example flammable liquids are prohibited on some bridges and in some tunnels. Most quantities of flammables are prohibited from some air shipments.
3. Transportation costs: in some cases it is more expensive to ship flammables.
4. Other: building codes, fire codes, insurance rates, etc., may be affected by the more hazardous flammable classification.

Based on the above, those attending were confident that the combustible classification appropriately described the hazard of alcohol ethoxysulfates and other similar alcohol solutions containing less than 24% alcohol.

VVV 000016863

However, a complicating factor is the OSHA Hazard Communication Standard labeling requirements which are effective November 25. OSHA requires all "containers" of hazardous materials to be labeled. OSHA has the same classification scheme for physical hazards. Materials with flash points less than 100°F are classed as

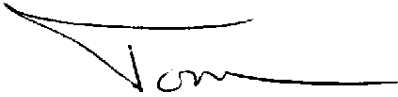
W. J. B. Vogel

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flammable. OSHA has no exemptions for aqueous solutions. In other words, a 55 gallon drum of 1412-S must be labeled as a flammable liquid. This regulatory conflict will be pursued by SDA.

Please let me know if you'd like to discuss the above.



Thomas G. Grumbles

ajo/007

cc Paul Gowan
Carl Kerfoot
Gary Draper
Wayne Hilgers

VVV 000016864