

Interoffice Communication

To R. R. Cooley

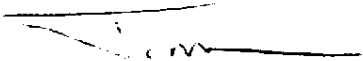
From T. G. Grumbles

Date March 19, 1984

Subject DIOXANE LEVELS IN ALFONIC 1412-A ETHER SULFATE

Based on discussions of the recent elevation of dioxane levels in the subject product, the following comments are offered.

1. There are very little quantitative data to suggest at what level of contamination a potential for significant exposure could exist for our employees and customers. Data available does indicate the 200-500 ppm level does not create exposures in our plant and, unless there are significant handling and processing differences in our customers plants, exposures would not reasonably be expected there. To the best of our knowledge the 200-500 ppm level is the industry norm and this should be our operational goal as well.
2. Due to analytical lag times and the absence of corrective action alternatives for batches exceeding a specified limit, it would appear impractical to set a manufacturing specification for dioxane levels.
3. For the reasons above, we encourage that the recognized process variables leading to dioxane formation be rigidly controlled where possible and the dioxane levels of finished batches be routinely measured. Environmental should be copied on these reports. If levels consistently exceed 200-500 ppm, from a product liability standpoint it would be prudent to add dioxane presence warnings. This has been done for EO presence in ethoxylate products.


Thomas G. Grumbles

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cc JJH, HWH, CFP, RDG, ET