

Recd. Liability

TO: Rick Tuttle

FROM: T. G. Grumbles

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Interoffice
Communication

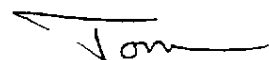
SUBJ: OFF-SPEC PRODUCT SAFETY

VISTA

The issue of the safety and applicable MSDSs for off-spec products is unfortunately one that is a classic case-by-case situation. If the property resulting in the material being off-spec is one unrelated to hazard, (i.e., color, water content, general homolog distribution) then in most cases no exceptional information is needed for the MSDS or general product warning.

However certain changes, for example benzene content exceeding 0.1% in off-spec C-1011 paraffins, would require modification of the MSDS and product warning. This is due to the actual hazard changing and regulatory requirements.

Any off-spec sale should be reviewed for the potential to present a different degree of hazard or contain a contaminant which must be specifically listed on the product warning literature. We can assist in this review and prepare appropriate MSDS's where necessary. Let me know if you want to discuss this issue further.



Thomas G. Grumbles

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cc P. C. Gowan

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