

JJH: JCL: TGG: RF

XF: none

TO: John Nelson

FROM: Tom Grumbles
DATE: March 6, 1985

Interoffice
Communication

SUBJ: MSDSs FOR SSO AND NPSO

VISTA

As we have discussed, the MSDS currently available for the subject streams were produced for the refinery to satisfy a "warnings clause" provision of the Asset Purchase Agreement. While suitable for the Refinery's handling practices and overall understanding of those streams some work is needed to get these MSDSs in shape to send to potential customers outside the company.

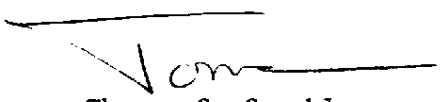
Specifically, the data required for Section 2, Hazardous Ingredients and Section 3, Physical Data was for the most part unavailable last summer and should be obtained. The component information needs to be as specific and detailed as possible. To meet an OSHA requirement which is effective 11/25/85, all hazardous components greater than 1% and carcinogens (if present) greater than 0.1% must be listed.

With a more detailed component and physical property analysis, the other information on the MSDS would then be reviewed to assure current statements are appropriate.

Also, the Vista MSDS has some changes on pages 1 and 4. A copy of these pages is attached. If the current sheets are sent to Cities with other product information, they should clearly be marked "draft" and language similar to that below should be used to assure they understand the limitations of those MSDSs.

This product has not been sold commercially and a detailed component analysis has not been done. This MSDS is drafted based on general product components and appropriate changes will be made when final product specifications are determined.

Please be aware that even sample size quantities of flammable liquids may have stringent packaging, marking, and labeling requirements for shipping purposes. Limited quantity exceptions may apply dependent on sample volume and mode of transportation. This should be carefully considered before shipping the samples.


Thomas G. Grumbles

VVV 000015930

ajo/006

Attachment

cc J. A. Hall, Pat Jernigan

JJH: JCL: TGG: RF

XF

TO: John Stokes
FROM: Tom Grumbles
DATE: March 5, 1985
SUBJECT: BY-PRODUCT ETHOXYLATE

Interoffice
Communication

VISTA

Based on the flash-point determination (154°F) for the initial shipment of the subject material, it is obvious there is a potential for this material to be a DOT combustible liquid for future shipments as well. To assure the proper shipping description, classification, and placarding requirements are met I recommend the following.

A flash-point determination must be run on each product batch to assure the proper transportation classification. This information should be given to the transportation department in-plant and paperwork generated by hand. Also, to verify the MSDS data to be used for the initial (draft) sheet to be sent to Sellers, the alcohol homolog distribution, and residual ETO levels should be determined on the initial 3-4 shipments.

At some point we may have enough experience and data to assign a COEDS compatible hazardous material description, but for now I think the billing should be done by hand to assure proper product classification.



T. G. Grumbles

bh

VVV 000015931