

~~TO:~~ JEL: MDG: RF
XF: 422 DATING

Interoffice
Communication

VISTA

TO: Distribution
FROM: T. G. Grumbles
DATE: December 22, 1986
SUBJ: ETHER SULFATE DIOXANE CONTAMINATION

A memo describing recent regulatory changes by DOL is attached. The changes will cause the hazardous materials descriptions and hazard class to change for certain products. One significant change to Vista is regarding ether sulfates. The hazardous materials description, for transportation purposes, changes as follows:

NOW: Compound, cleaning, liquid, combustible liquid,
N.A., 1993, "Placarded" combustible

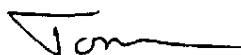
AFTER 1/1/87: RQ Compound, Cleaning, liquid, (1,4
dioxane), Flammable Liquid, N.A. 1993,
"Placarded" Flammable

The hazard class changes from combustible to flammable because we lose the exemption that allowed us to class ether sulfates as combustible.

The 1,4 dioxane must show in the description because that chemical has been assigned a one pound reportable quantity and bulk shipments (greater than 55 gallon drums) will contain greater than one pound due to the dioxane contaminant levels.

The dioxane showing on the bill of lading may raise the commercial issue that has occurred previously regarding dioxane presence in ether sulfates. The change in hazard classification will have administrative impacts and possibly require equipment changes for our toll processors. We should be sure our customers are aware of these changes.

I have discussed the above issues with Stepan. Further discussions will probably occur in the near future. These changes do not change our OSHA hazard determination decisions regarding carcinogenic labeling of these products. As long as the contamination levels are below 1000 ppm in the liquid, no warning is required. This issue is also being reviewed by Stepan.



T. G. Grumbles

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