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January 5, 2009

Gary Pruitt
Univar USA
17425 NE Union Hill Road
Redmond, WA 98052

Re: Product Stewardship Guidelines and Principles of MEGlobal

Dear Gary:

The purpose of this letter is to reinforce to distributors/traders your continuous obligations with respect to (1) the sale of MEGlobal's Ethylene Glycol (EG) family of products into only MEGlobal-supported applications, and (2) MEGlobal's Product Stewardship requirements. **Please promptly send this letter to the appropriate Product Safety Director and/or Product Steward within your organization.**

This letter relates to sales of MEGlobal's EG products from the following families (collectively, "MEGlobal EG Products"):

Monoethylene Glycol (MEG)
Diethylene Glycol (DEG)

Sales of MEGlobal EG Products


MEGlobal continues to re-evaluate its participation in various market segments. Potential shift in market participation should not suggest MEGlobal EG Products are ineffective in previously supported applications. To the contrary, this evaluation was undertaken to review and communicate MEGlobal's position in relation to support of future sales of MEGlobal EG Products.

The following standards apply to all MEGlobal EG Products on a go-forward basis. This does not affect any prior sale to a market or application that had previously knowingly been supported by MEGlobal.

The following list identifies end-use applications that are **NOT supported by MEGlobal for MEGlobal EG Products, monoethylene glycol (MEG) and diethylene glycol (DEG) marketed by MEGlobal** (“MEGlobal Ethylene Glycol Products”) on a go-forward basis. These limitations include applications in which the use of MEGlobal Ethylene Glycol Products is restricted by law, applications in which the use of MEGlobal Ethylene Glycol Products may raise unacceptable risks, and other applications which MEGlobal has decided not to pursue for business reasons, including minimizing unnecessary risk and liabilities to the company. MEGlobal does not knowingly market MEGlobal Ethylene Glycol Products into these non-supported applications, requests its distributors to refuse sales of MEGlobal Ethylene Glycol Products into these non-supported applications, and alerts its customers about the special risks associated with some of these non-supported applications. The following list of applications not supported by MEGlobal does not imply any MEGlobal warranty or MEGlobal support of uses in applications not covered by this list. This list is not all-inclusive, and MEGlobal reserves the right to modify the same at any time.

Non-supported applications of MEGlobal EG Products (MEG, DEG):

- The use of MEGlobal EG Products (MEG, DEG) in the production of tobacco and in the manufacture of tobacco products (including but not limited to additives, humectants, filters, inks, and paper) is not supported by MEGlobal.
- The use of MEGlobal EG Products (MEG, DEG) for the generation of artificial smoke / theatrical fogs / mist is not supported by MEGlobal.
- The use of MEGlobal EG Products (MEG, DEG) as ingredient in fuel for warming foods (Sterno™-like application) or in fuel for heating an enclosed space where human exposure is possible is not supported by MEGlobal.
- The use of MEGlobal EG Products (DEG, MEG) in fire extinguishing sprinkler systems is not supported by MEGlobal.
- The use of MEGlobal EG Products (MEG, DEG) in the manufacture of munitions is not supported by MEGlobal.
- The use of MEGlobal EG Products (MEG, DEG) in the production of deicers for use on roadways and pedestrian walkways is not supported by MEGlobal.
- The use of MEGlobal EG Products (MEG, DEG) as a component of heat transfer fluids in systems where the heat transfer fluids could infiltrate (i.e., via an exchanger leak, backflow prevention failure, or other means) a potable water system is not supported by MEGlobal.

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- The use of MEGlobal EG Products (MEG, DEG) as a non-reacted component in a formulation for direct internal or external human / animal contact, including, but not limited to ingestion, inhalation, and skin contact and in medical / veterinary devices and medial / veterinary applications is not supported by MEGlobal. Examples of some such applications are uses as a direct component in foods, beverages, pharmaceuticals, cosmetics, personal care products or children's products. The history of misuse in this particular application has raised totally unacceptable risks and caused significant damages to human health.
 - The use of MEGlobal EG Products (MEG, DEG) for consumer or hospital usage for deodorizing or air "purifying" purposes by spraying as an aerosol is not supported by MEGlobal.
 - The use of MEGlobal EG Products (MEG, DEG) as a non-reacted component in adhesives, plasticizers, and softening agents for packaging that has direct contact with food or beverage is not supported by MEGlobal.
 - The use of MEGlobal EG Products (MEG, DEG) as a non-reacted component in the formulation of glues, pastes, ice / heat packs or other items where the potential for significant human contact and/or ingestion exists (including but not limited to children's school glue/paste or arts/craft glue/paste, toys, children products) is not supported by MEGlobal.
 - The use of MEGlobal EG Product (MEG, DEG) as a fluid for pressure testing piping is not supported by MEGlobal.

To enter into new applications beyond the traditional standard industrial use applications supported by MEGlobal, contact your MEGlobal representative to review the specific application. MEGlobal has a risk assessment process whereby the application will be reviewed and a determination will be made as to whether the application meets MEGlobal's requirements and can therefore be supported by MEGlobal. Because use conditions and applicable laws may differ from one location to another and may change with time, when an application is supported by MEGlobal, MEGlobal does not warrant and is not responsible for the use in such applications. **NO WARRANTIES ARE GIVEN; ALL IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE AND ALL OTHER EXPRESS OR IMPLIED REPRESENTATIONS AND WARRANTIES PROVIDED BY STATUTE OR COMMON LAW ARE EXPRESSLY EXCLUDED. DISTRIBUTOR/TRADER ASSUMES ALL RISKS AND LIABILITIES RESULTING FROM THE USE OF MEGlobal EG PRODUCTS.**

Further, any failure to comply with the information contained in MEGlobal's Safety Data Sheet (SDS), Product Label, Product Information Guide, product literature or other product safety information is a misuse of MEGlobal EG Products (MEG, DEG). The circumstances, in which misuse might occur are numerous, so if at any time you or your customer's downstream use appears to be improper or unsafe, please contact me at the number listed below or your MEGlobal sales representative.

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Compliance with MEGlobal's Product Stewardship Guidelines

As a Responsible Care® company, MEGlobal is fully committed to Product Stewardship. This concept includes a common thread: whoever designs, produces, sells or uses a product has a shared responsibility to minimize detrimental impacts throughout all stages of the product's life-cycle. To assist in this endeavor, MEGlobal requests that its distributors/traders report to MEGlobal on new product uses, potential misuses, and adverse effects, including incidents that may negatively impact human health or the environment, or that may result in property damage, severe loss of primary containment, or media involvement. Sharing knowledge of these incidents with MEGlobal representatives (such as the Product Steward) is the recommended practice in addition to seeing that appropriate actions are initiated.

® Responsible Care is a registered trademark of the Canadian Chemical Producers' Association

As you are aware, MEGlobal furnishes information to its distributors/traders regarding safe handling, use and disposal of MEGlobal's EG Products (MEG, DEG). Such information is contained in MEGlobal's SDS, product labels, and product literature. At your request, MEGlobal will send to you copies of its current SDS and product literature for distribution to your customers. Please contact your MEGlobal representative or MEGlobal's Customer Information Group for free copies of the current SDS and product literature. Product literature on MEGlobal's EG products (MEG, DEG) can also be viewed at www.meglobal.biz.

As a MEGlobal EG Product distributor/trader, you acknowledge your continuing obligation to (1) familiarize yourself with any product literature or information MEGlobal provides under MEGlobal's product stewardship program, including the SDS and labels for MEGlobal EG Products (MEG, DEG); (2) adopt and follow safe handling, storage, transportation, use, treatment and disposal practices with respect to MEGlobal's EG Products (MEG, DEG), including such special care and practices as your use of MEGlobal's EG Products (MEG, DEG) require including, without limitation, all such practices required by federal, state and local government statutes, rules, regulations or ordinances; (3) instruct your employees, independent contractors, agents and customers of the precautions and safe use practices required in connection with the unloading, handling, storage, use, transportation and disposal of MEGlobal's EG Products (MEG, DEG), including without limitation information contained in MEGlobal's most current SDS; and (4) comply with applicable safety and environmental laws and take action necessary to avoid spills or other dangers to persons, property or the environment. You further acknowledge your continuing obligation to indemnify and hold MEGlobal harmless for all claims, damages and related costs, including reasonable attorney fees, arising out of your noncompliance with any of your commitments designated herein. These obligations apply whether the MEGlobal EG Products (MEG, DEG) are resold in containers packaged and labeled by MEGlobal, in bulk, or in any other manner in which the MEGlobal EG Products (MEG, DEG) are identified as a MEGlobal product.

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Finally, as a MEGlobal EG Product distributor/trader, you acknowledge your continuing obligation to discourage unsafe or improper applications of MEGlobal EG Products (MEG, DEG) by refusing to sell the products for applications not approved by MEGlobal. Failure to comply with any of the above will result in consequences up to and including the termination of our supplier/distributor/trader relationship for MEGlobal EG Products (MEG, DEG).

Thank you for this opportunity to revisit these guidelines. We appreciate your business and your role as a valued distributor/trader of MEGlobal EG Products (MEG, DEG). Please contact me if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads 'Larry Bradford'.

Larry Bradford
Quality System Specialist / Product Steward
225-353-4400