

[Handwritten signature]

June 5, 1987

VISTA

Greenwood Industries
ATTN: Rhonda
P.O. Box 40
Hwy. 10 S
Greenwood, AR 72936

Dear Rhonda:

Enclosed, per your request, are 200 copies (all we have in stock) of the pamphlet titled Facts About Working With PVC. We recently sent 300 copies of this pamphlet to Joe Sanneman, Central Industries. You might check with him to see if he has any extra copies.

If I can be of any further help, please let me know.

Sincerely,

[Handwritten signature of Thomas G. Grumbles]

Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

ajo

cc Jim Taylor

VVV 000008832

TSCA Section 8(a)
11/11/87

May 29, 1987

Chemical Inventory Section
OTS Document Control Officer (TS 790)
U. S. Environmental Protection Agency
Office of Toxic Substances
401 M Street, SW
Washington, DC 20460

CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

VISTA

RE: TSCA Inventory Corrections

Dear Sirs:

In 1978 Conoco Inc. filed chemical substance inventory reports for chemical substances manufactured by Conoco Chemical Company, a division of Conoco Inc., in accordance with Sections 8(a) and (b) of the Toxic Substances Control Act. Certain Conoco Chemical Company facilities were subsequently sold to Vista Chemical Company on July 20, 1984, as evidenced by the attached affidavit. Chemical substances for which Conoco Inc. filed chemical substance inventory reports continue to be manufactured by Vista at former Conoco Chemical Company facilities. Technical information on these products from the period of Conoco manufacture is enclosed.

For reasons which will be explained below, Vista requests that the substance definitions located in Appendix A of the TSCA chemical substances inventory be corrected to refine the identify of five substances previously reported by Conoco, now manufactured by Vista. A copy of the original Inventory Reporting forms, corrected Inventory Report forms, and corrected definitions for each of the substances are attached. The corrected Inventory Report forms are signed by a representative of Vista, as the new owner, rather than Conoco. The substances are process streams resulting from the manufacture and distillation of alkylbenzene. These streams are Class 2 inventory substances and are more accurately characterized as consisting of a class or classes of alkylbenzene compounds.

The five products for which corrections are requested have been produced by Conoco Chemicals facilities since before 1975, and after 1984 by Vista Chemical facilities. The present TSCA Inventory contains descriptions of these substances in Appendix A which specify boiling point range and do not identify the classes of chemical compounds which characterize the substance. The proposed corrections would replace the boiling point range/process type descriptions with a description of the class or classes of chemical compounds which most accurately characterize the substances. The need for these corrections was established during the preparation of a recently submitted PMN for a similar chemical substance.

VVV 000008833

U. S. Environmental Protection Agency
Page 2
May 29, 1987

In Vista's opinion, the proposed corrections more accurately describe the chemical substances even though the boiling point range has been deleted. Deletion of the boiling point range is based on the following: 1) lack of specification of boiling point methodology in the TSCA Inventory, 2) continual changes in boiling point measurement methodology since 1978, and the 3) lack of need to use boiling point ranges to accurately describe these substances.

The chemical identity of these substances, as specified by the corrections, has not changed since 1978. Regardless, we believe that chemical analysis should be regarded as a more definitive description of chemical identity than boiling point range.

If there are any questions, please contact me at 713/531-3445.

Sincerely,



Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

ajo
.1

VVV 000008834

AFFIDAVIT

STATE OF TEXAS
COUNTY OF HARRIS

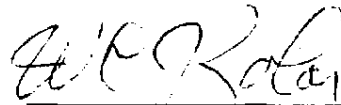
§
§
§

W.C. Kolar, being first placed under oath, deposes and says:

1. I am W.C. Kolar, Secretary, Vista Chemical Company (Vista).
2. As Secretary of Vista I have personal knowledge regarding the Company's records and affairs.
3. The Corporate Minute Book is maintained by me at 15990 North Barker's Landing Road, Houston, Texas.
4. Vista Chemical Company was incorporated as Disc Holdings, Inc. ("Disc") on October 4, 1983 under the laws of the state of Delaware.
5. The Company's name was changed from Disc to Vista Chemical Company ("Vista") by Amendment to the Certificate of Incorporation filed on November 2, 1983.
6. Vista's Restated Certificate of Incorporation was filed with the Secretary of State of Delaware on July 18, 1984.
7. Between the date of Vista's incorporation and July 20, 1984 Vista conducted no business activities other than activities necessary and appropriate to acquire certain assets of Conoco Chemicals Company, a division of Conoco Inc.
8. The Company acquired a portion of the assets of Conoco Chemicals Company, a division of Conoco Inc., through an asset purchase from E.I. Du Pont de Nemours and Conoco Inc. on July 20, 1984.
9. The Company acquired all rights, title and interest in and to all products produced by the assets of Conoco Chemicals Company purchased by the Company.

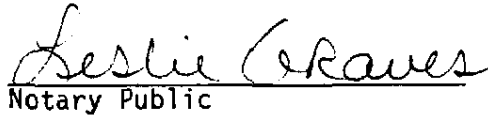
VVV 000008835

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on the 18th day of May, 1987.



W.C. Kolar
Secretary
Vista Chemical Company

SUBSCRIBED AND SWORN to before me, the undersigned authority, by the said W.C. Kolar, known to me to be the Secretary of Vista Chemical Company, on this 18th day of May, 1987.


Notary Public

LESLIE GRAVES
Notary Public, State of Texas
My Commission Expires July 11, 1987
Bonded by Lovett Agency, Lawyers Surety Corp.

VVV 000008836

35/WLM13

NOMENCLATURE KEY

<u>CONOCO NOMENCLATURE</u>	<u>ORIGINAL INVENTORY FORM NUMBERS</u>	<u>VISTA NOMENCLATURE</u>	<u>CORRECTED FORM NUMBERS</u>
DPA-5	30743900	3050	34424705
LMR-5	30743918	7050	34424713
N-6-B	30743926	160	34424671
DPA-6	30743579	3060	34424689
LMR-6	30744262	7060	34424697

VVV 000008837

IMPORTANT: Before completing this form, carefully read the EPA publication "Reporting Chemical Substance Inventory" which contains instructions for properly completing this form.

Approved OMB Form No.
1585-77011

U. S. ENVIRONMENTAL PROTECTION AGENCY
CHEMICAL SUBSTANCE INVENTORY REPORT
(Section 8(a) and (b) Toxic Substances Control Act 15 USC 2607)

FORM

C

I, CERTIFICATION STATEMENT: I hereby certify that, to the best of my knowledge and belief, (1) the chemical substance identified below has been manufactured or imported for a commercial purpose since January 1, 1973, and can be reported for the inventory (40 CFR 710); (2) all information entered on this form is complete and accurate; and (3) the confidentiality statements on the back of this form are true as to that information for which I have asserted a confidentiality claim. I agree to permit access to, and the copying of, records by a duly authorized representative of the EPA Administrator, in accordance with the Toxic Substances Control Act, to document any information reported here.

SIGNATURE M. L. SharrahDATE 4/20/78NAME/TITLE (TYPE OR PRINT) M. L. Sharrah, Senior Vice President

Research and Engineering

Date

EPA USE ONLY

III. CORPORATION

MID

Continental Oil Company

III. PLANT SITE NAME/ADDRESS

NAME Continental Oil CompanyADDRESS Baltimore Chemical Plant3441 Fairfield RoadCITY BaltimoreSTATE MDCOUNTY Baltimore CityZIP 21226DUN & BRADSTREET NO. 00-306-5984

IV. PRINCIPAL TECHNICAL CONTACT(S)

Ray C. Allred, Assistant Director

Environmental Conservation

Continental Oil Company

P. O. Box 1267

Ponca City, OK 74601

(405) 762-3456 Ext. 4533

FORM NO.

30743900

KNOWN

CONFIDENTIAL

CONFIDENTIAL

CONFIDENTIAL

CONFIDENTIAL

CONFIDENTIAL

CONFIDENTIAL

CONFIDENTIAL

CONFIDENTIAL

CONFIDENTIAL

NUMBER

1

EPA USE ONLY

EPA USE ONLY

(f) PLANT SITE

(e) CORPORATION

(d) PRODUCTION

(c) SITE LIMITED

(b) IMPORT

(a) MANUFACTURE

SITE LIMITED

IMPORT

MANUFACTURE

RANGE

44

CLASS 1

CLASS 2

X

X

SPECIFIC CHEMICAL NAME

(SEPARATE MULTIPLE NAMES WITH A SEMI-COLON)

Light ends from C₁₀ - C₁₂ alkyl benzene bottoms

CAS REGISTRY NUMBER (IF KNOWN)

NUMBER

IN THE SPACE PROVIDED BELOW, PROVIDE STRUCTURAL INFORMATION, MOLECULAR FORMULA, AND OTHER SUPPLEMENTAL INFORMATION TO AID IN THE SPECIFIC IDENTIFICATION OF THE CHEMICAL SUBSTANCE:

SEE ATTACHED SHEETS (WRITE FORM NO. ON ALL ATTACHMENTS)

NO. OF SHEETS

MOLECULAR FORMULA

n-decane
124-18-5

+

n-undecane
1120-21-4+ Cl₂n-dodecane
112-40-3

71-43-2

alkylation

7782-50-5

Mixed alkyl benzenes fractionation → overhead + whole bottoms

Whole bottoms fractionation → light ends boiling at 630°F - 740°F

VVV 000008838

IMPORTANT: Before completing this form, carefully read the EPA publication "Reporting on the Chemical Substance Inventory". That booklet contains instructions for properly completing this form.

Approved OMB Form No. 1305-77011

U. S. ENVIRONMENTAL PROTECTION AGENCY
CHEMICAL SUBSTANCE INVENTORY REPORT
(Section 8(a) and (b) Toxic Substances Control Act 15 USC 2607)

FORM

C

I. CERTIFICATION STATEMENT: I hereby certify that, to the best of my knowledge and belief: (1) the chemical substance identified below has been manufactured or imported for a commercial purpose since January 1, 1975, and can be reported for the inventory (40 CFR 710); (2) all information entered on this form is complete and accurate; and (3) the confidentiality statements on the back of this form are true as to that information for which I have asserted a confidentiality claim. I agree to permit access to, and the copying of, records by a duly authorized representative of the EPA Administrator, in accordance with the Toxic Substances Control Act, to document any information reported here.

SIGNATURE

DATE

NAME/TITLE (TYPE OR PRINT)

Research and Engineering

Foreign Supplier Signature

Date

MID

EPA USE ONLY

II. CORPORATION

Continental Oil Company

III. PLANT SITE NAME/ADDRESS

NAME Continental Oil Company

ADDRESS Baltimore Chemical Plant

3441 Fairfield Road

CITY Baltimore

COUNTY Baltimore City

STATE MD

ZIP 21226

DUN & BRADSTREET NO. 00-306-5984

IV. PRINCIPAL TECHNICAL CONTACT(S)

Ray C. Allred, Assistant Director

Environmental Conservation

Continental Oil Company

P. O. Box 1267

Ponca City, OK 74601

(405) 762-3456 Ext. 4533

NUMBER

1

EPA USE ONLY

EPA USE ONLY

(f) PLANT SITE

(e) CORPORATION

(d) PRODUCTION

(c) SITE LIMITED

(b) IMPORT

(a) MANUFACTURE

SITE LIMITED

IMPORT

MANUFACTURE

PRODUCTION RANGE

5

CLASS 1

CLASS 2

NAME

Heavy Ends from C₁₀ - C₁₂ alkyl benzene bottoms

CAS REGISTRY NUMBER (IF KNOWN)

LMR-5

NUMBER

1

IN THE SPACE PROVIDED BELOW, PROVIDE STRUCTURAL INFORMATION, MOLECULAR FORMULA, AND OTHER SUPPLEMENTAL INFORMATION TO AID IN THE SPECIFIC IDENTIFICATION OF THE CHEMICAL SUBSTANCE:

SEE ATTACHED SHEETS (WRITE FORM NO. ON ALL ATTACHMENTS)

NO OF SHEETS

MOLECULAR FORMULA

n-decane 124-18-5

n-undecane 1120-21-4

n-dodecane 112-40-3

+ C₁₂

7782-50-5

alkylation



71-43-2

Mixed alkyl benzenes fractionation → overhead + whole bottoms

Whole bottoms fractionation → light ends + heavy ends boiling above 740°F

VVV 000008839

IMPORTANT: Before completing this form, carefully read the EPA publication "Reporting for Chemical Substance Inventory" that booklet contains instructions for properly completing this form.

Approved OMB Form No. 1505-77011

U. S. ENVIRONMENTAL PROTECTION AGENCY
CHEMICAL SUBSTANCE INVENTORY REPORT
(Section 8(a) and (b) Toxic Substances Control Act 15 USC 2607)

FORM

C

I. CERTIFICATION STATEMENT: I hereby certify that, to the best of my knowledge and belief: (1) the chemical substance identified below has been manufactured or imported for a commercial purpose since January 1, 1973, and can be reported for the inventory (40 CFR 710); (2) all information entered on this form is complete and accurate; and (3) the confidentiality statements on the back of this form are true as to that information for which I have asserted a confidentiality claim. I agree to permit access to, and the copying of, records by a duly authorized representative of the EPA Administrator, in accordance with the Toxic Substances Control Act, to document any information reported here.

SIGNATURE M. I. Sharrah

DATE 4/24/78

NAME/TITLE (TYPE OR PRINT) M. I. Sharrah, Senior Vice President

Research and Engineering

Date

Foreign Supplier Signature

MID

EPA USE ONLY

II. CORPORATION

Continental Oil Company

III. PLANT SITE NAME/ADDRESS

NAME Continental Oil Company

ADDRESS Baltimore Chemical Plant

3441 Fairfield Road

CITY Baltimore

STATE MD

COUNTY Baltimore City

ZIP 21226

DUN & BRADSTREET NO. 00-306-59841

IV. PRINCIPAL TECHNICAL CONTACT(S)

Ray C. Allred, Assistant Director

Environmental Conservation

Continental Oil Company

P. O. Box 1267

Ponca City, OK 74601

405 762-3456 Ext. 4533

FORM NO. 30743579

UNKNOWN

IT IS CONFIDENTIAL (AND/OR) THE CAS REGISTRY NUMBER

(ANCE WHERE THE IC

V. CHEMICAL S

NUMBER	1
EPA USE ONLY	
(f) PLANT SITE	
(e) CORPORATION	
(d) PRODUCTION	
(c) SITE LIMITED	
(b) IMPORT	
(a) MANUFACTURE	
SITE LIMITED	
IMPORT	
MANUFACTURE	X
PRODUCTION RANGE	4

CLASS 1

CLASS 2

SPECIFIC CHEMICAL

NAME

(SEPARATE MULTIPLE NAMES WITH A SEMI-COLON)

Light ends from C₁₂ - C₁₄ alkyl benzene bottoms

CAS REGISTRY NUMBER (IF KNOWN)

NUMBER

00A-6

IN THE SPACE PROVIDED BELOW, PROVIDE STRUCTURAL INFORMATION, MOLECULAR FORMULA, AND OTHER SUPPLEMENTAL INFORMATION TO AID IN THE SPECIFIC IDENTIFICATION OF THE CHEMICAL SUBSTANCE:

SEE ATTACHED SHEETS (WRITE FORM NO. ON ALL ATTACHMENTS)

MOLECULAR FORMULA



71-43-2

+

n-dodecane

112-40-3

n-tridecane

629-50-5

n-tetradecane

629-59-4

+ Cl₂

7782-50-5

alkylation

Mixed alkyl benzenes fractionation → overhead + whole bottoms

Whole bottoms fractionation → light ends boiling from 680-800°F

VVV 000008841

U. S. ENVIRONMENTAL PROTECTION AGENCY
CHEMICAL SUBSTANCE INVENTORY REPORT
(Section 8(a) and (b) Toxic Substances Control Act 15 USC 2607)

FORM
C

I. CERTIFICATION STATEMENT: I hereby certify that, to the best of my knowledge and belief: (1) the chemical substance identified below has been manufactured or imported for a commercial purpose since January 1, 1975, and can be reported for the inventory (40 CFR 710); (2) all information entered on this form is complete and accurate; and (3) the confidentiality statements on the back of this form are true as to that information for which I have asserted a confidentiality claim. I agree to permit access to, and the copying of, records by a duly authorized representative of the EPA Administrator, in accordance with the Toxic Substances Control Act, to document any information reported here.

SIGNATURE M. L. Sharrah

DATE 4/29/78

NAME/TITLE (TYPE OR PRINT) M. L. Sharrah, Senior Vice President
Research and Engineering

Foreign Supplier Signature _____ Date _____

EPA USE ONLY		II. CORPORATION	
MID		Continental Oil Company	
III. PLANT SITE NAME/ADDRESS			
NAME <u>Continental Oil Company</u>			
ADDRESS <u>Baltimore Chemical Plant</u>			
<u>3441 Fairfield Road</u>			
CITY <u>Baltimore</u>		STATE <u>MD</u>	
COUNTY <u>Baltimore City</u>		ZIP <u>21226</u>	
DUN & BRADSTREET NO. <u>00-306-5984</u>			
IV. PRINCIPAL TECHNICAL CONTACT(S)			
Ray C. Allred, Assistant Director			
Environmental Conservation			
Continental Oil Company			
P. O. Box 1267			
Ponca City, OK 74601			
(405) 762-3456 Ext. 4533			

FORM NO. 30744262

UNKNOWN AT CLASS CONFID	NUMBER	1	EPA USE ONLY
	EPA USE ONLY		
	(f) PLANT SITE		
	(e) CORPORATION		
	(d) PRODUCTION		
	(c) SITE LIMITED		
	(b) IMPORT		
	(a) MANUFACTURE		
	SITE LIMITED		
	IMPORT		
MANUFACTURE	X		
PRODUCTION RANGE	5		

(g) ☐ CHEMICAL SUBSTANCE IDENTITY IS CONFIDENTIAL

(1) SUBSTANTIATION: ☐ No. of sheets attached (write form number on all substantiation sheets).

(2) Proposed Generic Name: _____

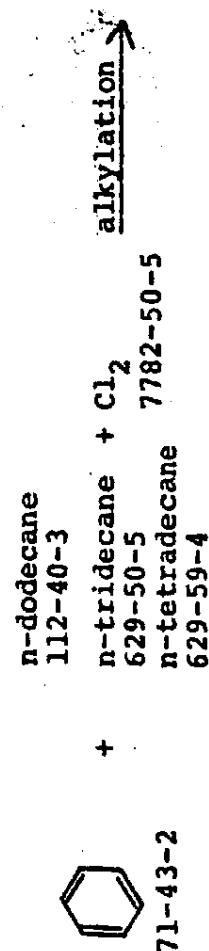
(3) I agree to the terms of CONFIDENTIAL CHEMICAL SUBSTANCE IDENTITY STATEMENT on the back of this form. ☐

CAS REGISTRY NUMBER (IF KNOWN)	SPECIFIC CHEMICAL NAME (SEPARATE MULTIPLE NAMES WITH A SEMI-COLON)	CLASS 1 ☐	CLASS 2 ☒
		Heavy ends from C ₁₂ - C ₁₄ alkyl benzene bottoms	
NUMBER	1		

IN THE SPACE PROVIDED BELOW, PROVIDE STRUCTURAL INFORMATION, MOLECULAR FORMULA, AND OTHER SUPPLEMENTAL INFORMATION TO AID IN THE SPECIFIC IDENTIFICATION OF THE CHEMICAL SUBSTANCE:

☐ SEE ATTACHED SHEETS (WRITE FORM NO. ON ALL ATTACHMENTS)

MOLECULAR FORMULA



Mixed alkyl benzenes fractionation → overhead + whole bottoms

Whole bottoms fractionation → light ends + heavy ends boiling above 800°F

VVV 000008842

Conoco

Surfactants, Industrial
Chemicals and Plastics

Headquarters

Conoco Chemicals Company
A Division of Conoco Inc.
15990 N. Barkers Landing Road
P.O. Box 19029
Houston, TX 77224
(713) 531-3200
TELEX 794557
TWX 910-881-7329

Domestic Sales Offices

Eastern Region
Park 80 Plaza East
Saddle Brook, NJ 07662
(201) 845-3800
TWX 710 990-5123

Midwestern Region
Suite No. 120
2222 Camden Court
Oak Brook, IL 60521
(312) 655-7070
TWX 910 651-0210

Southwestern Region
Texas Bank & Trust Building
6161 Savoy, Regency Square
P.O. Box 2197
Houston, TX 77252
(713) 965-5117
TELEX 775347

Western Region
Smoketree Plaza
1450 N. Tustin
Suite 100
Santa Ana, CA 92701
(714) 541-8449

International Sales Offices

Conoco Chemicals Latin America S.A.
15990 N. Barkers Landing Road
P.O. Box 19029
Houston, TX 77224
(713) 531-3200
TELEX 794557

Conoco Chemicals Europe, S.A.
Conoco Incorporated
Rue Joseph Stevens 7
Brussels 1000, Belgium
Telephone: (32-2) 513-7490
TELEX 24727
Cable: CONOCHEM, Brussels

Conoco Chemicals Far East, Incorporated
P.O. Box 110
Kasumigaseki Building
(25th Floor)
Tokyo, Japan 100
Tel: (81-3) 593-0611
TELEX: J29368
Cable: CONOCHEM Tokyo



Conoco Chemicals

VVV 000008843

HYDROTROPES

Used as solubilizing agents in detergent formulations and as anti-caking agents in spray-dried powder detergents.

Product	Common Name
AXS	Ammonium Xylene Sulfonate
STXS	Sodium Toluene Xylene Sulfonate
SXS	Sodium Xylene Sulfonate

MURIATIC ACID

High-purity water white acids; used as analytical reagents, pH control agents, swimming pool chemicals.

Product	% HCl
20° Baume'	31.45
22° Baume'	35.21

ALUMINUM CHLORIDE LIQUOR

CONOCO Aqueous Aluminum Chloride Liquor is 20% $AlCl_3$ with clear, straw yellow color. Applications include anti-perspirant production, paper sizing, sewage (phosphate) treatment and preparation of roofing granules.

SOLVENTS AND OILS

Conoco LPA® solvent is a high purity, aliphatic hydrocarbon with very low levels of aromatics and reactive impurities.

Conoco OFS oil is a high purity aliphatic hydrocarbon with very low levels of aromatics and reactive impurities. OFS is suitable for use in oil based drilling muds in environmentally sensitive areas.

NORMAL PARAFFINS

CONOCO C_{1216} and C_{1416} normal paraffins are high purity, linear, saturated paraffin blends. They are generally low odor, low viscosity liquids.

CONOCO CATAPAL® SB ALUMINA

Ultra-high purity pseudo boehmite alumina; used as catalyst support as well as in non-catalytic applications; may serve as its own binder or be peptized with acids or other peptizing agents; excellent forming properties.

Typical Chemical Composition	Wt. %
Al_2O_3 content	71.0
Loss on Ignition	29.0
Carbon	0.036
SiO_2	0.008
Fe_2O_3	0.005
Na_2O	0.004
Sulfur	< 0.01
Property	Typical
Surface Area*	280m ² /gm
Loose Bulk Density	710gm/liter
Particle Size Distribution	55% < 45microns 22% < 90microns

*After calcination for 3 hours at 900° F.

CONOCO CDR® FLOW IMPROVER

CDR® Flow Improver is a unique chemical additive which can be injected into a crude oil or hydrocarbon products pipeline to increase throughput. By reducing turbulence in the flow, CDR® directs more energy to moving additional fluid through the line thus resulting in improved system economics.

CONOCO METHYL CHLORIDE

High-purity methylating agent used in the production of silicones, lead alkyls, butyl rubber, quarternary amines, and herbicides.

Typical Chemical Composition	
Methyl Chloride, Wt %	99.97
Dimethyl Ether, ppm	5
Water, ppm	35
Acidity, as HCl, ppm	< 4
Residue, ppm	< 50

OLEFINS AND AROMATICS

Conoco capitalizes on its integrated position in crude oil, refinery processing and natural gas to produce ethylene from heavy and light feedstock steam cracking facilities. Conoco produces ethylene, propylene, benzene, butadiene and a variety of co-products used as based building blocks by the CPI. These products are used to manufacture derivatives such as polyethylene, acrylonitrile, SBR, nylon, PVC resins, polystyrene, linear alcohols, glycols, nonionic surfactants, emulsifiers and antifreeze.

Ethylene and Co-Products	Ethylbenzene
Ethylene	Methylacetylene-Allene Concentrate
Propylene (Chemical Grade)	C_8 Aromatics
Butadiene	Isoprene Concentrate
Crude C_4 's	Piperylene Concentrate
Mixed Butylenes	Pyrolysis Gasoline
Benzene	Pyrolysis Tar Blend
O-Xylene	
M/P-Xylene	Ethylene Derivatives
Resin Oil	Ethylene Oxide
Heavy Aromatic Oils	Ethylene Glycol
Dicyclopentadiene	Ethylene Dichloride
Naphthalene	Vinyl Chloride Monomer (VCM)

VVV 000008844