

TGG: JGL: MMG: AJO: RF  
XF: Desk

January 23, 1989

VISTA

Mr. Bob Smith  
Document Control Office  
Chemical Inventory Section, TS-790  
USEPA  
Office of Toxic Substances  
401 M Street, N.W.  
Washington, D. C.

Dear Bob:

Based on recent discussions regarding the June 8, 1988 letter (attached) proposing to correct certain inventory listings for Vista Alkylate and Specialty Alkylate products Vista is proposing the descriptions attached as diagram 1, 2, and 3. These diagrams are similar to those submitted with our June 8 letter. The proposed descriptions will achieve the following.

1. Correct 1978 submissions in regards to boiling point changes that have occurred as a result of boiling point methodology changes and minor changes in process feedstock character. The chemical identify of the products has not changed since 1978.
2. Provide stream type description for our process feedstocks rather than considering the paraffin feed a mixture of individual homolog paraffins.
3. Provide alkylate product and specialty alkylate descriptions that are consistent with the feedstock stream descriptions and consistent with current inventory descriptions for other similar alkylate products. These proposed descriptions also allow for a clear feedstock to precursor to bottoms sequence.

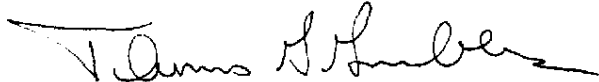
The above is based on our mutual determination that we improperly listed our products on the inventory in 1978. These products could have been given a simple individual stream description. The carbon ranges proposed are based on the SDA terminology method in Volume 1 of the inventory and your assessment of the carbon range distribution for the products that was provided to you in our letters of August 5, 1987, and June 8, 1988. Both are attached.

VVV 000006693

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Please let us know what the next step is to proceed with these corrections. We will be happy to meet with you in Washington if necessary.

Sincerely,



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

dlj

Attachment

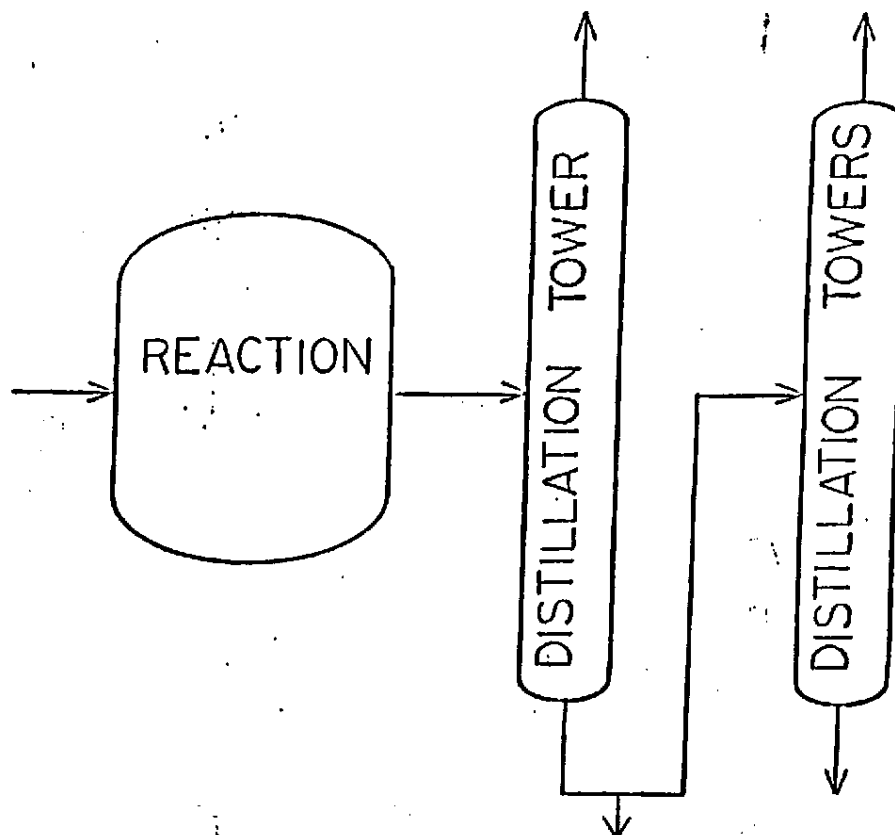
cc: Da Young Lee - EPA

bcc: L. R. Bauer-BALT, J. W. Ware-LCLAB, W. L. McClain

VVV 000006694

NORMAL PARAFFIN FEED

Alkanes C<sub>12-14</sub> desulfurized



DETERGENT ALKYLATE PRODUCT

Benzene mono C<sub>12-14</sub>, alkyl derivs.

Benzene, mono C<sub>12-14</sub>, alkyl derivs.  
fractionation bottoms, light fraction

Descriptor: A light fraction resulting  
from the distillation of C<sub>12-14</sub>  
alkylbenzenes fractionation bottoms,  
boiling predominately above 595°F.

Benzene, mono C<sub>12-14</sub>, alkyl derivs.  
fractionation bottoms

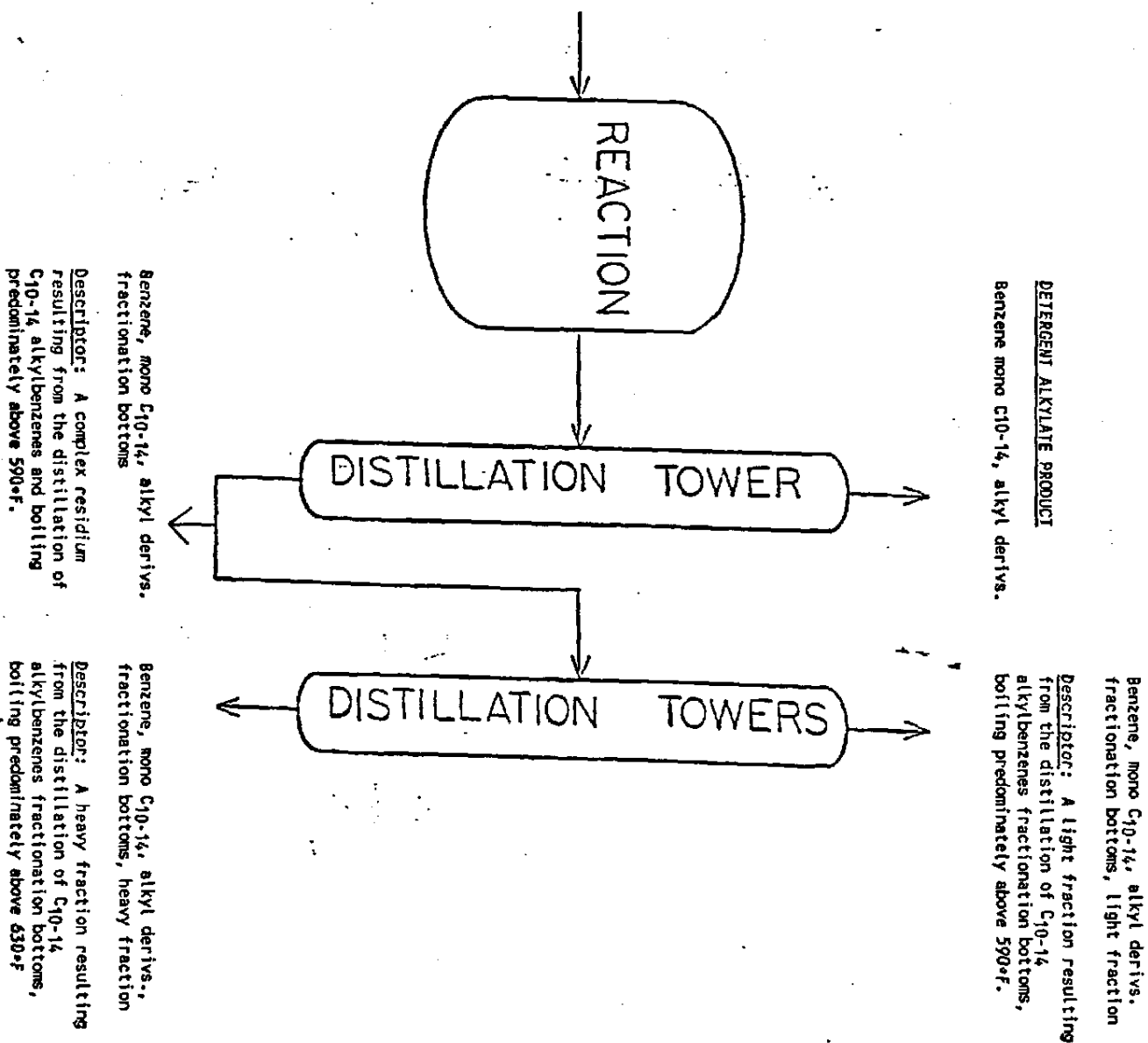
Descriptor: A complex residuum  
resulting from the distillation of  
C<sub>12-14</sub> alkylbenzenes and boiling  
predominately above 595°F.

Benzene, mono C<sub>12-14</sub>, alkyl derivs.,  
fractionation bottoms, heavy fraction

Descriptor: A heavy fraction resulting  
from the distillation of C<sub>12-14</sub>  
alkylbenzenes fractionation bottoms,  
boiling predominately above 630°F

VWV 000006695

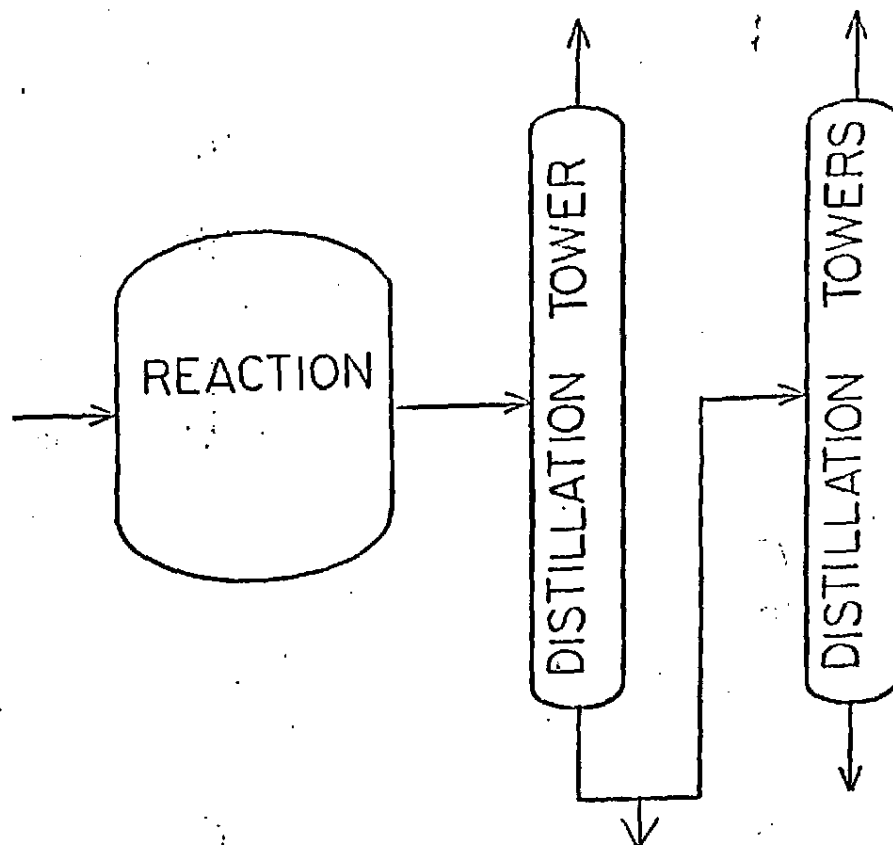
NORMAL PARAFFIN FEED  
Alkanes C<sub>10</sub>-14 desulfurized



WV 00006696

NORMAL PARAFFIN FEED

Alkanes C<sub>10-13</sub> desulfurized



DETERGENT ALKYLATE PRODUCT

Benzene mono C<sub>10-13</sub>, alkyl derivs.

Benzene, mono C<sub>10-13</sub>, alkyl derivs.  
fractionation bottoms, light fraction

Descriptor: A light fraction resulting  
from the distillation of C<sub>10-13</sub>  
alkylbenzenes fractionation bottoms,  
boiling predominately above 590°F.

Benzene, mono C<sub>10-13</sub>, alkyl derivs.  
fractionation bottoms

Descriptor: A complex residuum  
resulting from the distillation of  
C<sub>10-13</sub> alkylbenzenes and boiling  
predominately above 590°F.

Benzene, mono C<sub>10-13</sub>, alkyl derivs.,  
fractionation bottoms, heavy fraction

Descriptor: A heavy fraction resulting  
from the distillation of C<sub>10-13</sub>  
alkylbenzenes fractionation bottoms,  
boiling predominately above 630°F

VVV 000006697