

~~TGG: JCL~~ ERT: ~~MH~~: AJO: RF

XF: none

TO: WJB Vogel

FROM: T. G. Grumbles
DATE: December 28, 1990

Interoffice
Communication

SUBJ: LAB TSCA Inventory Status: Competitor Alkylates

VISTA

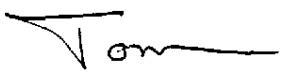
At the last surfactants quarterly review, after reviewing our recent inventory description changes for our alkylate and specialty alkylate products, you asked that I review the status of competitor alkylates, particularly foreign producers, in regards to TSCA inventory listing.

We reviewed the technical information available to us. Product information was available for Monsanto, Wibarco, Enichem, and Petresa. However, only the Monsanto and the Wibarco literature contained information on inventory status.

Both producers listed CAS numbers that are on the TSCA inventory. Wibarco represents their product with a C10-13 description that is very closely descriptive of their product.

Monsanto uses a C10-16 description to represent a broad range of alkylate products. This is what we believe is inappropriate based on conversations with EPA and is what caused us to make the inventory corrections. However, based on the nuances of the TSCA inventory and the history of agency enforcement, there is little risk Monsanto would be "called" on their inventory representation.

As to the other foreign producers, they probably would be able to find a current inventory description that adequately represents their products. The regulations do dictate that products must be on the inventory to import into the U.S.


T. G. Grumbles

dlj

cc: D. Plummer
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VVV 000011599