

Vista Chemical Company

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**VISTA**

October 2, 1991

TGG: JEL: ~~FWJ~~: AC: AJO: RF  
XF: \_\_\_\_\_

Mr. John Gwynn  
Plant Engineer  
Pilot Laboratories  
267 Homestead Avenue  
Avenel, NJ 07001

Dear John:

I have reviewed the definition of "Petroleum" in the copy of the NJAC 7:1E-1.6 that you sent. It is my opinion that Vista Nalkylene 500 is not covered by this description. This opinion is based on the apparent intent of the definition to cover classical refinery streams. This is indicated by the use of the words "bituminous liquid", the processes described and the examples given.

While the actual intent of the definition cannot be known without speaking to the state, the above is my opinion.

Sincerely,

*Thomas G. Grumbles*

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

dlj

cc: R. R. Cooley

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