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June 8, 1988

VISTA

Mr. Robert Smith
Document Control Office
Chemical Inventory Section, TS-790
U. S. Environmental Protection Agency
Office of Toxic Substances
401 M Street, NW
Washington, DC 20460

Dear Robert:

As we have discussed, and as was outlined in the August 5, 1981 letter (attached with August 12 corrections) to Mark Scoville, Vista Chemical is proposing the following descriptions for our alkylate and specialty alkylate products. These descriptions are consistent with your sections desire to achieve consistency of inventory description methods for these products. These actions are based on agreements reached in our meeting of July 22 and outlined in the above referenced letter.

The basic process flows for Vista's three alkylate products are attached. The descriptions below are added to those diagrams to clarify the applicability of the descriptions.

Process Feedstock - As referenced in the August 5 letter we will consider our paraffin feedstock to be covered by the following description:

Sorption Extracted Normal Paraffins C5-20
(CAS # 64771-72-8)

Premium Alkylate Product - The premium detergent alkylate produced will be described as follows:

Benzene, C10-15-Alkyl

A form C will be filed to obtain a corrected inventory status for this material and a CAS number obtained.

Specialty Alkylate Products - All derivative products from the process will be described as follows:

Benzene, C10-15-Alkyl Derivatives

A Form C will be filed to obtain a corrected inventory status for these products and a CAS number obtained.

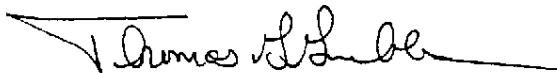
VVV 000014698

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Vista believes the above descriptions to be consistent with the Agency's guidance on describing complex mixtures or "process streams" for inventory purposes.

Please contact me by mail or at 713/531-3445 to discuss our next step.

Sincerely,



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

ajo

cc W. L. McClain, J. P. Warner, D. L. Mahler, M. G. Hayes

VVV 000014699

DETERGENT ALKYLATION PRODUCT
N-500 TYPICAL DISTRIBUTION, WT. %

<C ₁₀		0.6
C ₁₀	BENZENE, N-DECYL	19.8
C ₁₁	BENZENE, N-UNDECYL	33.6
C ₁₂	BENZENE, N-DODECYL	35.4
C ₁₃	BENZENE, N-TRIDECYL	9.1
≥C ₁₄	BENZENE, TETRADECYL	1.5

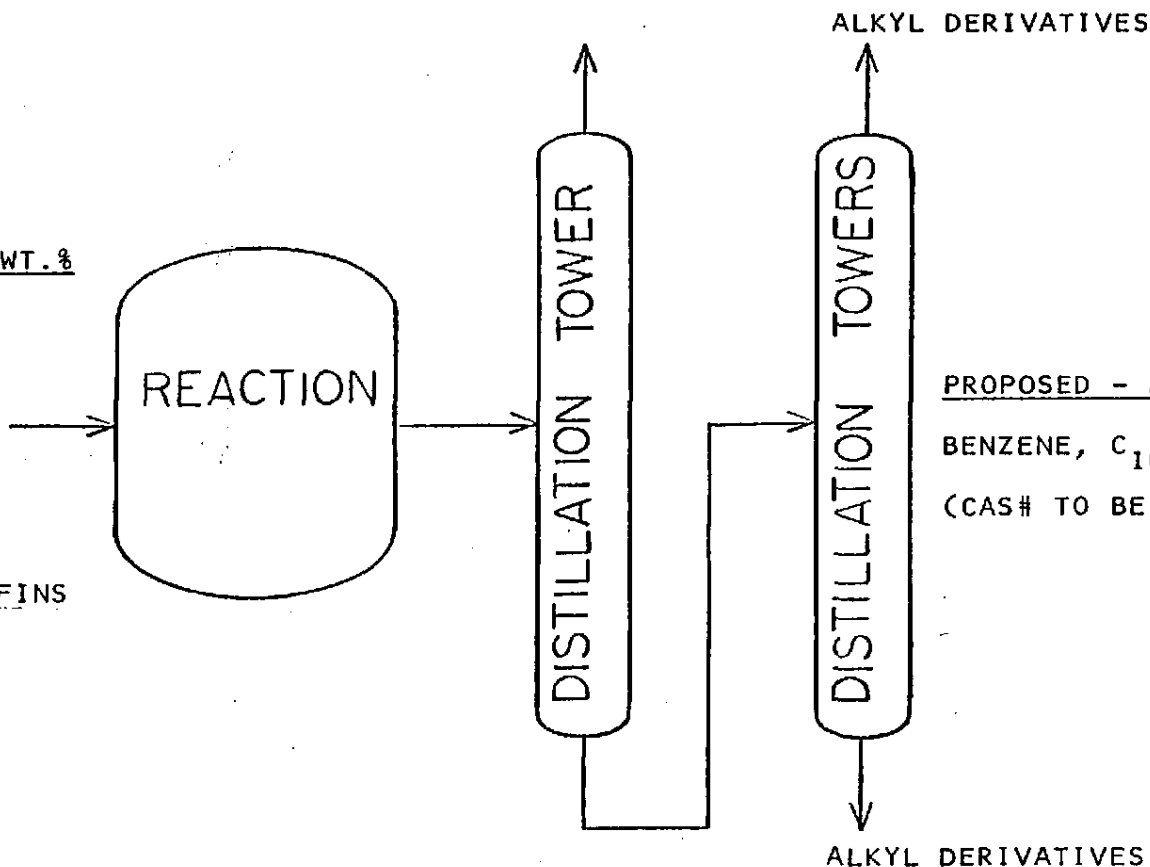
PROPOSED - REVISE WITH FORM C

BENZENE, C₁₀₋₁₅ ALKYL
(CAS# TO BE OBTAINED)

NORMAL PARAFFIN FEED
TYPICAL DISTRIBUTION, WT. %

<C ₁₀		0.6
C ₁₀	DECANE	19.8
C ₁₁	UNDECANE	33.6
C ₁₂	DODECANE	35.4
C ₁₃	TRIDECANE	9.1
≥C ₁₄	TETRADECANE	1.5

PROPOSED - WILL BE
CONSIDERED SORPTION
EXTRACTED NORMAL PARAFFINS
(CAS# 64771-72-8)



PROPOSED - REVISE WITH FORM C

BENZENE, C₁₀₋₁₅ ALKYL DERIVATIVES
(CAS# TO BE OBTAINED)

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DETERGENT ALKYLATE PRODUCT
N-550L TYPICAL DISTRIBUTION, WT. %

<C ₁₀		0.3
C ₁₀	BENZENE, N-DECYL	13.4
C ₁₁	BENZENE, N-UNDECYL	30.4
C ₁₂	BENZENE, N-DODECYL	29.0
C ₁₃	BENZENE, N-TRIDECYL	24.0
C ₁₄	BENZENE, N-TETRADECYL	3.0
≥C ₁₅	BENZENE, N-PENTADECYL	0.2

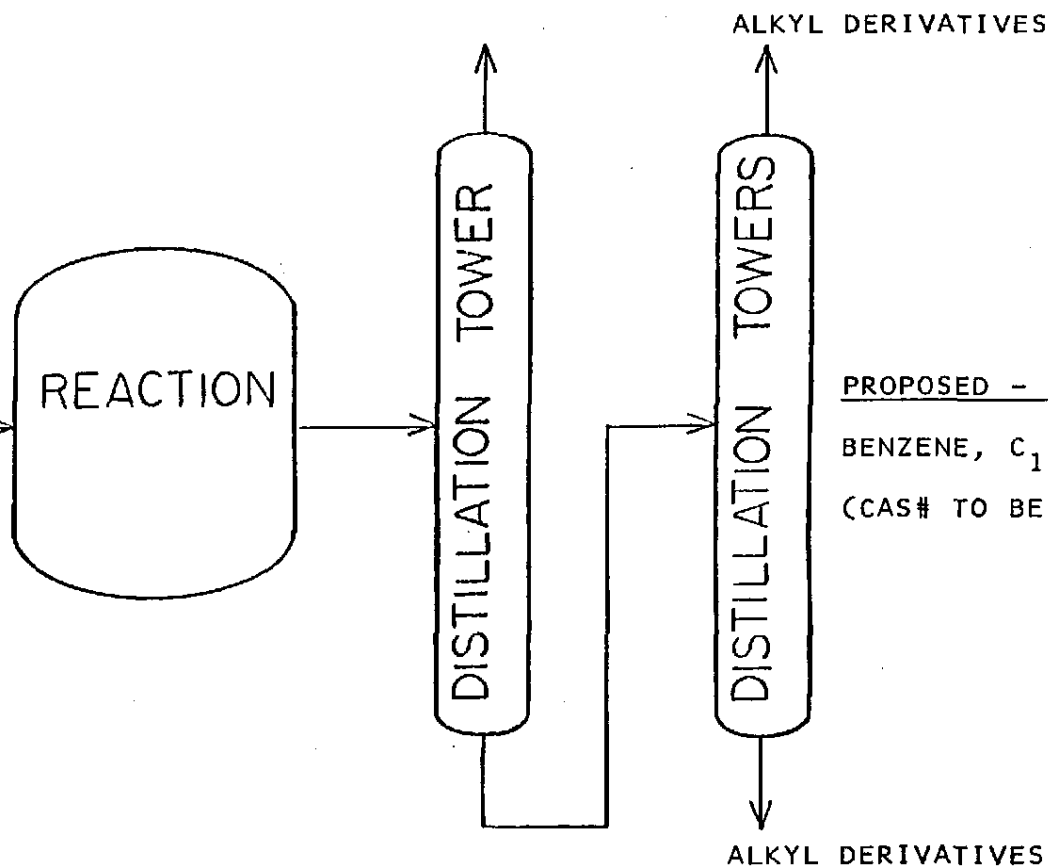
PROPOSED - REVISE WITH FORM

BENZENE, C₁₀₋₁₅ ALKYL
(CAS# TO BE OBTAINED)

TYPICAL DISTRIBUTION, WT. %

<C ₁₀		0.3
C ₁₀	DECANE	13.4
C ₁₁	UNDECANE	30.4
C ₁₂	DODECANE	29.0
C ₁₃	TRIDECANE	24.0
C ₁₄	TETRADECANE	3.0
≥C ₁₅	PENTADECANE	0.2

PROPOSED - WILL BE
CONSIDERED SORPTION
EXTRACTED NORMAL PARAFFINS
(CAS# 64771-72-8)



PROPOSED - REVISE WITH FORM C

BENZENE, C₁₀₋₁₅ ALKYL DERIVATIVES
(CAS# TO BE OBTAINED)

VVV 000014701

DETERGENT ALKYLATE ODUCT
N-600L TYPICAL DISTRIBUTION, WT. %

<C ₁₀		TRACE
C ₁₀	BENZENE, N-DECYL	0.3
C ₁₁	BENZENE, N-UNDECYL	1.5
C ₁₂	BENZENE, N-DODECANE	19.2
C ₁₃	BENZENE, N-TRIDECYL	48.0
C ₁₄	BENZENE, N-TETRADECYL	28.0
≥C ₁₅	BENZENE, N-PENTADECYL	3.0

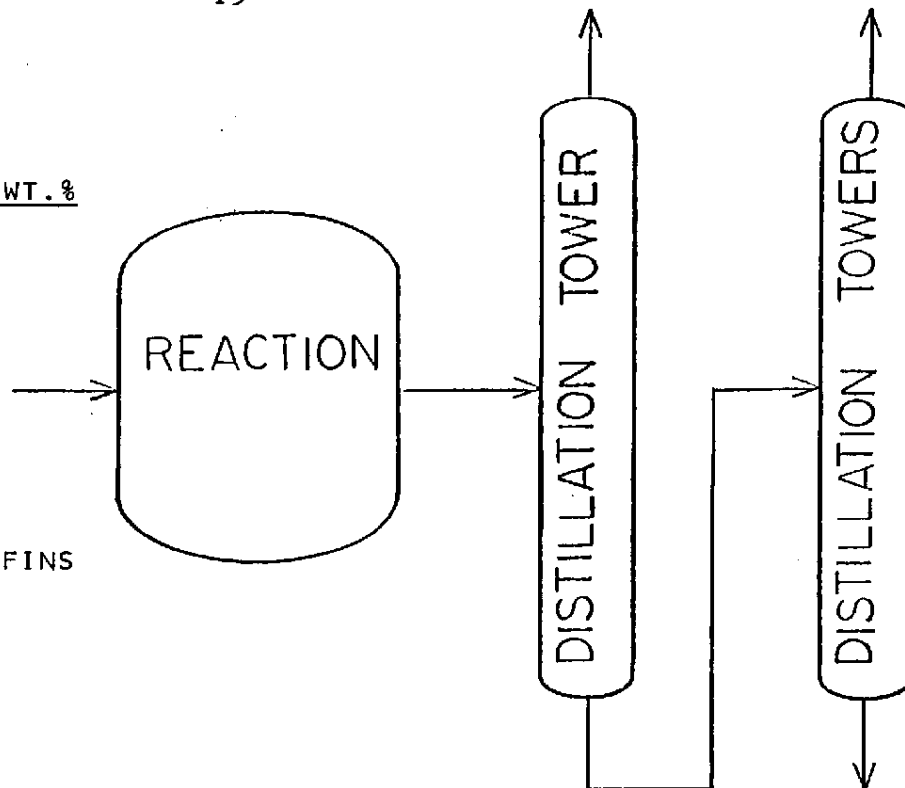
PROPOSED - REVISE WITH FORM C

BENZENE, C₁₀₋₁₅ ALKYL
(CAS# TO BE OBTAINED)

NORMAL PARAFFIN FEED
TYPICAL DISTRIBUTION, WT. %

<C ₁₀		TRACE
C ₁₀	DECANE	0.3
C ₁₁	UNDECANE	1.5
C ₁₂	DODECANE	19.2
C ₁₃	TRIDECANE	48.0
C ₁₄	TETRADECANE	28.0
≥C ₁₅	PENTADECANE	3.0

PROPOSED - WILL BE
CONSIDERED SORPTION
EXTRACTED NORMAL PARAFFINS
(CAS# 64771-72-8)



PROPOSED - REVISE WITH FORM C

BENZENE, C₁₀₋₁₅ ALKYL DERIVATIVES
(CAS# TO BE OBTAINED)

VVV 000014702