

Vista Chemical Company

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Mr. John Wannamaker
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VISTA

RE: DSL LISTING FOR VISTA N-550 AND N-575 ALKYLATE

Vista believes the description below, which is now on the provisional DSL is an appropriate description for vista 550L and 575L.

CAS # 67774-74-7; Benzene, C₁₀₋₁₃ alkyl derivs.

The typical carbon range distribution for these products is as follows:

<u>550L</u>		<u>575L</u>	
< C ₁₀	0.3%	< C ₁₀	0.5
C ₁₀	13.4	C ₁₀	8.0
C ₁₁	30.4	C ₁₁	17.0
C ₁₂	29.0	C ₁₂	25.0
C ₁₃	24.0	C ₁₃	35.0
C ₁₄	3.0	C ₁₄	15.0
≥ C ₁₅	0.2	≥ C ₁₅	0.4

Please note that the above distributions are representative only and may not be exactly what you have received. However, for DSL purposes these ranges should provide enough information to describe the products.

As we have discussed, the most appropriate description for these alkylate products depends on how you view the carbon range allowance in a description. In general, the USEPA has accepted the carbon range that best describes at least 80% of the material. If a broad range description is acceptable for the DSL, then an alternate choice to describe these products would be CAS #68648-87-3, Benzene, C₁₀₋₁₆ - alkyl derivs.

Sincerely,

Thomas G. Grumbles

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

dlj

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