

CERTIFIED MAIL #P 241 411 126
RETURN RECEIPT REQUESTED

April 20, 1987

Mr. Glen A. Miller
Administrator
Hazardous Waste Division
Dept. of Environmental Quality
P. O. Box 44307
Baton Rouge, LA 70804-4307

bcc:
RAC MGH
(GEH WPS) PEM
(MLA SCR)
JCL WLMCE
ROH

VISTA

Re: Shipment of Heavy Ends from Vista VCM Plant to BFG in
La Porte, Texas as a feedstock

Dear Mr. Miller:

Please be advised of Vista Chemical Company's intention of shipping Heavy Ends from the VCM Plant to the ^{B.F.} ~~BP~~ Goodrich Plant in La Porte, Texas as a chemical feedstock in their catoxid process for the production of EDC/VCM. Since the Heavy End material is used in such a manner, we will not manifest the shipments but will supply Bills of Lading and ship the material under D.O.T. regulations.

The rationale behind this decision is based upon the following factors:

- 1) The Heavy Ends feedstock is being used as an ingredient in an industrial process to make a new product without distinct components of the feedstock being recovered as an end product.
- 2) The material is not being speculatively accumulated.
- 3) The material is not used in a manner constituting disposal i.e. incineration as listed in 40 CFR Part 261.2.
- 4) The material is not used to produce fuel or contained in fuels, or reclaimed.
- 5) An excess of the material is not placed into the process. The purchase of commercial chlorine is still necessary to satisfy BFG's total chlorine feedstock requirements for EDC/VCM production.
- 6) The Catoxid process is totally enclosed and environmentally sound with records of receipt and usage maintained.

CWH 000008262

Mr. Glen Miller
Page Two
April 20, 1987

A 4/15/87 telephone conversation with Ms. Karen Fisher of your office and a subsequent phone call to Mr. Phil Windsor - Acting Facility Head Unit I of the Texas Water Commission - Hazardous and Solid Waste Permits Section, verified the appropriateness of this decision.

We plan to continue to send some Heavy Ends to PPG in Westlake, shipping the material as hazardous waste under the recycle/reclaim manifests.

Please call me at (318) 494-5031, if there are any questions regarding these intentions.

Sincerely,

E. R. Taylor
Environmental Coordinator

jh

CWH 000008263

Certified Mail
Return Receipt Requested

SHOW TO J.C. W.H.M.C.

April 20, 1987

Mr. Glenn A. Miller
Administrator
Hazardous Waste Division
Dept. of Environmental Quality
Baton Rouge, La 70804-4307
P.O. Box 44307

from Vista VCM Plant
Re: Shipment of Heavy Ends to BFB in La Porte, TX
as ~~to~~ feedstock.

Dear Mr. Miller:

Please be advised of Vista Chemical Company's
intention of ^{shipping} ~~shipping~~ Heavy Ends to the
BFB Goodrich Plant in La Porte, TX as a
chemical feedstock for their production of
in their Catoxid process. Since the ^{heavy ends} material is used ⁱⁿ such ^a manner, we
will not ~~be~~ manifest the shipments but will supply
Bills of Lading and ship ^{the material} under D.O.T.
regulations.

The rationale behind this decision is
based upon the following factors:

- 1) The Heavy Ends feedstock is being used
as an ingredient in an industrial process to
make a new product without distinct
components of the feedstock being recovered
as an end product ~~in a Catoxid process~~.
- 2) The material is not being speculatively
accumulated.
- 3) The material is not used in a manner

CWH 000008264

in 40 CFR Part 261.2.

- constituting disposal or incineration as listed.
- 4) The material is not used to produce fuel or contained in fuels, or reclaimed.
 - 5) The Catoxid process is totally enclosed and environmentally sound with records of receipt and usage maintained.
 - 5) An excess of the material is not placed into the process. The purchase of commercial chlorine is still necessary ~~for the~~ to satisfy BFG's total chlorine feedstock requirements for EDC/VCM production.

4/15/87

A telephone conversation with Ms. Karen Fisher of your office and a subsequent phone call to Mr. Phil Windsor - Acting Facility Head Unit I of the Texas Water Commission - Hazardous and Solid Waste Permits Section, verified the appropriateness of this decision.

We will continue, however, to ship any Heavy Ends to PPG in Westlake, TX as hazardous waste under the recycle/reclaim manifest.

Please call me at 318 494-5031, if there are any questions regarding these intentions.

Sincerely

E. R. Naylor
Environmental Coordinator

CWH 000008265

bcc: RAC MSH (BEN WPS) PEM (MLA SCR) JCL WLMCC RDN

in 40 CFR Part 261.2.

- constituting disposal re. incineration as listed.
- 4) The material is not used to produce fuel or contained in fuels, or reclaimed.
 - 5) The Catoxid process is totally enclosed and environmentally sound with records of receipt and usage maintained.
 - 5) An excess of the material is not placed into the process. The purchase of commercial chlorine is still necessary ~~for B7E~~ to satisfy B7E's total chlorine feedstock requirements for EDC/VCM production

4/15/87

A telephone conversation with Ms. Karen Fisher of your office and a subsequent phone call to Mr. Phil Windsor - Acting Facility Head Unit I of the Texas Water Commission - Hazardous and Solid Waste Permits Section, verified the appropriateness of this decision.

We
Environ
waste

Please
questi

Since

We plan to continue to send some
~~heavy ends~~ Heavy Ends to PP6 in Westlake,
shipping the material as hazardous
waste under the recycle/reclaim manifest

Heavy
ends
etc.
are any

EPRA
Environmental Coordinator

CWH 000008266

bcc: RAC MSH (BEH WPS) PEM (MLA SCR) JCL WLMCC RDA