

Interoffice
Communication

TO: Chris Pierson

TGG: JCL: ERT: MJH: AJO: RF

XF: _____

FROM: T. G. Grumbles
DATE: December 6, 1990

VISTA

SUBJ: PERMIT/LICENSE REQUIREMENTS FOR SELLING AND HANDLING
ETHANOL

The requirements for production, transfer and handling of "distilled spirits" are covered in 27 CFR, Alcohol, Tobacco Products and Firearms regulations.

Based on discussion with agency staff in Dallas, it is clear that anyone receiving our ethanol stream would have to be licensed to do so. The contaminants in our product do not qualify it as "denatured" and this has no bearing on the requirement.

There are specific requirements for application to receive "spirits in bond" and recordkeeping by the receiving facility. In fact a specific form (Form 5100.16) should be provided to us as evidence of the receivers capability to process the product. This requirement is in Subpart G of the regulations.

The general requirements for registration of a facility processing ethanol are found in Subpart G.

Let me know if you have further questions on this issue.

T G Grumbles
T. G. Grumbles

dlj

cc: D. L. Cohen, P. Douvry

VVV 000011505