

Interoffice
Communication

TO: Distribution

TGG: JCL: ERT: MJH: AJO: RF

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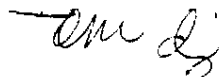
FROM: T. G. Grumbles

DATE: April 20, 1990

SUBJ: TSCA INVENTORY CORRECTIONS FOR ALKYLATE AND SPECIALTY
ALKYLATE STREAMS

VISTA

Attached is our final (hopefully) correspondence with EPA regarding the TSCA inventory descriptions for our Baltimore and Lake Charles products. Once I get some indication they have been added to the inventory I'll proceed to review them with the Business Area, R&D and Manufacturing in terms of new product development and product modifications.



T. G. Grumbles

dlj
.131

Distribution: D. L. Mahler, P. Warner-Balt, T. Salah-LCLAB, M. G.
Hayes-LCCP

W. L. McClain

cc: without forms
R. Bryan

J. Ware-LCLAB, J. Friend-LCCP, R. Bauer-Balt, O. C. Kerfoot-
Austin

VVV 000012915

Vista Chemical Company

900 Threadneedle
Houston, Texas 77079
(713) 588-3000

P.O. Box 19029
Houston, Texas 77224
Fax (713) 588-3236

CERTIFIED MAIL RETURN RECEIPT REQUESTED

April 19, 1990

VISTA

OTS Document Control Officer (TS-790)
U. S. Environmental Protection Agency
Office of Toxic Substances
401 M Street, S. W.
Washington, D. C. 20460

Attention: Chemical Inventory Section

Re: INVENTORY CORRESPONDENCE NUMBER IC-2557

Dear Sirs:

As instructed in the attached letter from Henry P. Lau, Vista Chemical Company is submitting the attached inventory corrections for our process feedstocks, distillates, alkylates and specialty alkylate products.

Please contact the undersigned at 713-588-3445 if you have questions on the attached Form C's. It is our understanding, based on the attached letter, that these descriptions will be added to the unpublished, non-confidential TSCA Inventory.

Sincerely,



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

dlj

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Thomas G. Grumbles, C.I.H.
Environmental Quality Manager
Vista Chemical Company
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Post Office Box 19029
Houston, Texas 77224

TSCA CONFIDENTIAL
BUSINESS INFORMATION
DOES NOT CONTAIN NATIONAL
SECURITY INFORMATION (E.O. 12065)

RE: IC-2557

Dear Mr. Grumbles:

This is in response to your letters of June 8, 1988, January 23, 1989, May 2, 1989 and EPA's meeting with you and Mr. Warner of Vista Chemical Company on April 11, 1989, proposing amendments to the identities of your alkylate and specialty alkylate products originally reported by CONOCO Inc. for inclusion in the Toxic Substances Control Act (TSCA) Initial Inventory. The Agency has reviewed the information you have provided in your letters.

In your letters, you stated that CONOCO identifies the process feedstock 'paraffin feed' as a blended mixture of individual homolog paraffins, each identified by its own CAS Registry Number. The Agency does not believe that it is appropriate for the manufacturer to characterize the paraffin feed as individual Class 1 substances. The feedstocks, distillates, alkylate products and specialty alkylate products will require the following descriptions for inclusion in the TSCA Inventory:

- (1) Sorption Extracted Normal Paraffins C10-C16
- (2) Alkanes, C10-13
- (3) Alkanes, C10-14
- (4) Alkanes, C12-14
- (5) Alkanes, C14-16
- (6) Benzene, mono C10-13 alkyl
- (7) Benzene, mono C10-14 alkyl
- (8) Benzene, mono C12-14 alkyl
- (9) Benzene, mono C14-16 alkyl
- (10) Benzene, mono C10-13 alkyl, fractionation bottoms
- (11) Benzene, mono C10-14 alkyl, fractionation bottoms
- (12) Benzene, mono C12-14 alkyl, fractionation bottoms
- (13) Benzene, mono C14-16 alkyl, fractionation bottoms

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- (14) Benzene, mono C10-13 alkyl, fractionation bottoms, light ends
- (15) Benzene, mono C10-14 alkyl, fractionation bottoms, light ends
- (16) Benzene, mono C12-14 alkyl, fractionation bottoms, light ends
- (17) Benzene, mono C14-16 alkyl, fractionation bottoms, light ends
- (18) Benzene, mono C10-13 alkyl, fractionation bottoms, heavy ends
- (19) Benzene, mono C10-14 alkyl, fractionation bottoms, heavy ends
- (20) Benzene, mono C12-14 alkyl, fractionation bottoms, heavy ends
- (21) Benzene, mono C14-16 alkyl, fractionation bottoms, heavy ends

The Agency believes that the above descriptions are consistent with Inventory listing policy for describing complex mixtures or "process streams" of alkylate products. If you still wish to submit corrections on these substances, please describe your substances on the enclosed, blank TSCA Inventory Report Forms C using these twenty one process stream/alkyl range descriptions, and submit them to the Agency. Once we receive the completed forms we will include the identities of your substance in the unpublished, non-confidential TSCA Inventory. In completing the forms, please note that you are not permitted to assert claims of confidentiality for information that was not claimed as such on your original forms.

For future correspondence regarding this matter, please reference Inventory Correspondence Number IC-2557 and address your letter to:

- OTS Document Control Officer (TS-790)
- U.S. Environmental Protection Agency
Office of Toxic Substances
401 M Street, S.W.
Washington, D.C. 20460
ATTN: Chemical Inventory Section

Very truly yours,



Henry P. Lau
Chief
Chemical Inventory Section

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BUSINESS INFORMATION
DOES NOT CONTAIN NATIONAL
SECURITY INFORMATION (E.O. 12958)

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