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TO: Distribution

FROM: T. G. Grumbles

DATE: April 17, 1989

Interoffice
Communication

VISTA

SUBJ: EPA TSCA INVENTORY CORRECTIONS MEETINGS FOR ALKYLATE
PRODUCTS

On March 11, Paul Warner and I met with Mark Scoville, Robert Smith and Dr. Doyoung Lee of the inventory office to resolve questions regarding the inventory description revisions for alkylate and specialty alkylate products, as proposed in our January 23, 1989 letter to Dr. Lee. This meeting was part of our continuing dialogue with EPA on the proposed corrections. The process started in May, 1987.

In summary the agency asked for additional information to support their decision on the acceptability of the corrections proposed in January of this year. They would not commit but indicated they were acceptable and when the additional information was received, they would respond in writing with detailed instructions on how to complete the Form "C"'s.

Below is a summary of the meeting and resultant action items for Vista.

1. The meeting started with a review of the history of our efforts to achieve the inventory corrections. Bob Smith and Mark Scoville clearly stated their desire to complete this process. Bob Smith once again reviewed the "different rules" for inventory descriptions for refinery streams and chemical streams. He indicated these corrections were difficult to do because our alkylate and specialty alkylate products were on the borderline of these two stream types.
2. Mark Scoville indicated they had a need to understand what Conoco was doing in 1978 when the original alkylate descriptions were developed versus what Vista was doing today. To help this understanding, Paul Warner drew a basic process flow diagram on the chalk board in the room and supplemented this with further descriptions of the LCLAB process differences. At this point, questions were asked regarding the boiling point and carbon range distribution, monoalkylbenzene vs. dialkylbenzene content and the desulfurization of the paraffin feedstocks.

Having heard the above, Scoville stated that it was clear to him that there was no other way to describe 7050 and 3050 than with a boiling point/stream type description.

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Robert Smith indicated some concern over the downstream impact of these changes on our customers, and asked if we knew how our customers reported their products for inventory purposes.

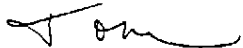
Mark Scoville asked that we provide them with an "overall" process flow diagram starting with the paraffin production. He also asked who our competitors in the alkylate business were. They were surprised to hear we only had one.

3. At this point, Scoville indicated this was an informational meeting not a decision-making meeting and they needed additional data to support the corrections. He would not commit to the descriptions proposed but indicated he believed they would be acceptable.

Bob Smith asked for us to send MSDS's for the products and additional environmental effects information to further support their decision.

4. To conclude the meeting, we pressed for what the next step would be after the agency received the additional information. Scoville stated they would respond in writing and send us Form C's with detailed instructions on how to complete them. Scoville repeated that he didn't want to have to correct correction forms and "wanted to fix it so he would never have to look at this issue again". (This was said in a positive tone!)
5. As we ended the meeting Scoville indicated they had been visiting industry and wondered if they might visit the Baltimore plant. We told him to contact us later if he wished to pursue this and it probably was possible.

As to the Action Items, Paul Warner will develop the process flows, and I will gather the MSDS's and environmental effects data. I'll also try to find something about how our major customers report their products. The goal is to have the information package complete, reviewed, and submitted by April 24.



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