

5/6/80 [unclear]

**TEXACO**  
INC.

EN 80-12  
I-A-1

JOHN F. TESSIERI  
VICE PRESIDENT  
RESEARCH, ENVIRONMENT  
AND SAFETY

P. O. BOX 509  
BEACON, NEW YORK 12508

RECEIVED  
ENVIRONMENTAL PROTECTION  
AGENCY

May 2, 1980

JUN 06 1980

CENTRAL DOCKET  
SECTION

Mr. James J. Kohanek  
Field Operations and Support Division  
(EN-397), U.S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, D.C. 20460

RE: Request for Waiver For TC-11064  
Pursuant to Section 211(f)(4) of  
Clean Air Act

Dear Mr. Kohanek:

As requested in your recent phone conversation with Dr. Brian Biasotti of our Fuels Research Section, attached is a copy of our letter requesting a waiver for TC-11064 with which we have blanked out information which we consider confidential to Texaco.

Please let us know if we can be of further assistance in this matter.

Very truly yours,

*[Handwritten Signature]*

JBB-cf

EMJ-MDR  
SMJ

Attachment

JET INC. NEW YORK, N.Y.  
INC.

Attachment  
JET-JJK  
5/2/80

P. O. BOX 509  
BRACON, NEW YORK 12506

JOHN J. JENSEN  
VICE PRESIDENT  
CONSULTANT ENVIRONMENTAL  
AND SAFETY

February 29, 1980

Mr. Robert A. Davis  
Deputy Assistant Administrator For Mobile Sources  
Environmental Enforcement (Room W-11)  
Environmental Protection Agency  
101 T Street, N.W.  
Washington, D. C. 20460

RE: Request For Waiver For TC-11064  
Exemption To Section 211(f)(4) of  
Clean Air Act

Dear Mr. Director:

I am writing you regarding Section 211(f)(4) of the Clean Air Act, which provides for a waiver from the restrictions on the use of gasoline additive pack TC-11064. As stated in my letter of January 29, 1980 to you, TC-11064 fully complies with the definition of EPA's Proposed Interpretative (44 Fed. Reg. 3007; March 16, 1979) for defining "a gasoline additive" (Section 211(f)(1)). Therefore, based on its physical and chemical characteristics, it is not subject to emission control devices required for the release certification of vehicles under the Act. To the contrary, the overriding purpose of the Act is to provide a better means to meet the air quality standards set forth by Congress.

TC-11064 is a nitrogenous gasoline additive which is used in both high level carburetor



Mr. Benjamin Jackson

- 3 -

February 29, 1980

Since TC-11064 and TC-9755 are proprietary products to Texaco we request that all information pertaining to the composition of these materials be treated as confidential.

In summary, Texaco hereby requests a waiver to use TC-11064 at a concentration not to exceed 60 PTB. We welcome the opportunity to discuss the waiver in further detail if you so desire.

Very truly yours,

*Signed*

JOHN E. TESSIERI

JBB-cf

Attachments

BLIND: ESG  
RKM  
HCMS  
SMJ  
WPR (H-PA) - SMJ - MDR  
SLJ

TABLE 1

The table consists of four columns and four rows of data. All content within the table is redacted with black bars. The redaction is complete, obscuring all text and numbers. The layout is as follows:

[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]

Attachment  
JET-EJ  
2/29/80

TABLE 2

The table structure is obscured by redaction. It appears to have at least two main columns of data. The redaction consists of thick, solid black horizontal bars covering the text in each cell. Some small, illegible fragments of text are visible between the bars.