PCI Synthesis

January 12, 2012

International Compliance Assurance Division
Office of Federal Activities
US Environmental protection Agency
Ariel Rios Building, Mail Code 2254A
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460
Attn: Mr. Scott Nelson

Dear Mr. Nelson;

In accordance with EPA regulations 40 CFR 262.56 and 262.87(a), PCI Synthesis is submitting the CY 2011 annual report for the export of hazardous waste.

An electronic copy of the CY 2011 report and this cover letter has been sent to Ms. Laura Coughlan at coughlan.laura@epa.gov . The report is in the MS EXCEL format using the spreadsheet provided by your office.

If there are any questions or concerns regarding this report or any other matter, please contact me by email; bill.anderson@pcisynthesis.com or by phone, (978) 463-4882.

Best Regards;

Bill Anderson

Bill Anderson
Manager, Environmental Health & Safety
PCI Synthesis
9 Opportunity Way
Newburyport, MA 01950
(978) 463-4882

received
SOn 1/24/2012

PCI Synthesis

9 Opportunity Way
Newburyport, MA 01950

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20460

International Compliance Assurance Division
Office of Federal Activities
US Environmental Protection Agency
Ariel Rios Building, Mail Code 2254A
1200 Pennsylvania Ave, NW
Washington, D.C. 20460

CY 2011 Hazardous Waste Export Report

Route

EPA Mail

To: Federal Activities

Mailstop: ARIEL RIOS NORTH

Department: 2254A

Phone:

PKG Condition Certified

Scott

FIRST CLASS MAIL

FIRST CLASS MAIL

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Exporter Information

Exporter Name:	PCI Synthesis
Exporter EPA Identification Number:	MAR000007955
Exporter Mailing Street Address:	9 Opportunity Way
Exporter Mailing City:	Newburyport
Exporter Mailing State:	Massachusetts
Exporter Mailing Zip Code:	1950
Exporter Mailing Country:	US
Exporter Site Street Address:	9 Opportunity Way
Exporter Site City:	Newburyport
Exporter Site State:	Massachusetts
Exporter Site Zip Code:	1950
Exporter Site Country:	US

Calendar Year Covered by Report:	2011

Exporter Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Exporter Printed Name:	Bill Anderson
Exporter Signature:	Bill Anderson
Date of Signature:	1/12/2012

As required in 40 CFR 262.56(a)(5) and 40 CFR 262.87(a)(5), Except for hazardous waste produced by exporters of greater than 100 kg but less than 1000 kg in a calendar month, unless provided pursuant to §262.41 [biennial report], when submitting in even numbered years:

(i) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated:	**PCI incorporates solvent reuse and recycle in every manufacturing process that will allow. Each process is reviewed during scale up and HAZOP (step by step) to identify any way hazardous materials (mostly solvents) can be reused or recycled (Onsite or by offsite vendor). The toxicity of the materials used can be reduced slightly through substitution, however, the formulation of our main product (Active Pharmaceutical Ingredients, API'S) cannot be deviated from due to CGMp and FDA regulations.**
(ii) A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984:	**PCI exported five organic solvent streams and one halogenated organic solvent stream as hazardous waste. Alll the material is recycled for reuse.**

Receiving Facility Name	Receiving Facility Street Address	Receiving Facility City	Receiving Facility State or Province	Receiving Facility Zip Code	Receiving Country	Hazardous Waste Description	Applicable RCRA Hazardous Waste Code(s)	Applicable OECD Waste Codes [if submitting report under 40 CFR 262.87(a)]	DOT Hazard Class	Total Quantity Shipped During Reporting Year	Units for Total Quantity Shipped	Total Number of Shipments During Reporting Year	Transporter Name	Transporter EPA ID Number (required if transporter carried hazardous waste with RCRA manifest in US)	Transporter Name
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Acetone	D001, F003	N/A	3	12,320	P	9	Freehold	NJD054126164	
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Methanol	D001, F003	N/A	3	143,264	P	10	Freehold	NJD054126164	
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Methylene chloride	F002	N/A	6.1	44,550	P	6	Freehold	NJD054126164	
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Toluene	D001, F005	N/A	3	62,568	P	5	Freehold	NJD054126164	
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Isopropanol/Butanol	D001, F003	N/A	3	57,288	P	7	Freehold	NJD054126164	
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Ethyl Acetate	D001, F003	N/A	3	6,150	P	3	Freehold	NJD054126164	

Transporter EPA ID Number (required if transporter carried hazardous waste with RCRA manifest in US)	Transporter Name	Transporter EPA ID Number (required if transporter carried hazardous waste with RCRA manifest in US)