PCI

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February 23, 2015

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

Dear Administrator;

In accordance with EPA regulations 40 CFR 262.56 and 262.87(a), PCI Synthesis is submitting the CY 2014 annual report for the export of hazardous waste.

An electronic copy of the CY 2014 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
SDM 2/23/2015

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:	201

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:	2/20/2015

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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)
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Acetone	D001, F003	N/A	3	26,775	P	12	Freehold	NJD054126164
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Methanol	D001, F003	N/A	3	279,720	P	13	Freehold	NJD054126164
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Methylene chloride	F002	N/A	6.1	60,690	P	10	Freehold	NJD054126164
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Toluene	D001, F005	N/A	3	49,392	P	11	Freehold	NJD054126164
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Isopropanol/Butanol	D001, F003	N/A	3	32,660	P	1	Freehold	NJD054126164
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Ethyl Acetate	D001, F003	N/A	3	11,774	P	4	Freehold	NJD054126164
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Methanol/Ethyl acetate	D001, F003	N/A	3	8400	P	6	Freehold	NJD054126164
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Heptane	D001	N/A	3	632	P	1	Freehold	NJD054126164
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Isopropanol	D001	N/A	3	355	P	1	Freehold	NJD054126164

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 six organic solvent streams, one halogenated organic solvent stream and two mixed waste streams as hazardous waste. Alll the material is recycled for reuse.**

Acceptable Units of Measurement
G = Gallons (liquids only)
K = Kilograms
L = Liters (liquids only)
M = Metric Tons (1000 kilograms)
N = Cubic Meters
P = Pounds
T = Tons (2000 pounds)
Y = Cubic Yards

Instructions

(1) Please note that this form is being provided for your convenience. It contains all required elements for annual reports under 40 CFR 262.56 and 40 CFR 262.87(a).

(2) "Exporter Page" - please fill out all items listed on this page, which correspond to 40 CFR 262.56(a)(1)-(2) and (6), and 40 CFR 262.87(a)(1)-(2) and (6).

(3) If you are required to comply with 40 CFR 262.56(a)(5) and/or 40 CFR 262.87(a)(5), fill out the "Waste Reduction Page".

(4) "Export Data by Destination" - please fill out all items listed on this page for each waste stream you shipped during the reporting year to each receiving facility, which correspond to 40 CFR 262.56(a)(4) and 40 CFR 262.87(a)(4).

(a) The "Receiving Facility" should be the ultimate recycling or disposal facility to which you received consent to export the specific waste streams.

(b) The "Applicable OECD Hazardous Waste Codes" are only filled out if you shipped the waste stream to a country listed in 40 CFR 262.58(a)(1) for recovery under 40 CFR Part 262 Subpart H. If you are filling out, please use the applicable waste codes from the appropriate OECD waste list incorporated by reference in 40 CFR 262.89(d). The consolidated green and amber waste lists are on pp.81-98 of the Guidance Manual for the Amended 2001 OECD Decision, available online at http://www.oecd.org/dataoecd/57/1/42262259.pdf

(c) The "Total Quantity Shipped During Reporting Year" should be the sum of all shipments of that specific waste stream to that specific receiving facility.

(d) The "Units for Total Quantity Shipped" should be the units of measurement for the quantity shipped. Please use one of the units listed in the "Acceptable Quantity Units" page.

(e) List all transporters used from the initial pick up of the specific waste stream in the US to the final delivery at the specific receiving facility. To list more than three transporters, select columns "R" and "S", copy the columns, and then paste to the right as many times as needed.

(f) The sheet has been formatted to print out in landscape mode and has been shrunk to fit all columns on one page width. If you need to add more transporter columns, you will need to further shrink the print area to fit the columns to one page width.

(g) The set print area includes all current columns and the first 25 data entry rows. If you add columns or have more than 25 unique waste stream-receiving facility combinations, you will need to expand the print area to cover all needed columns and rows.

(5) Please save the filled out document with a name that includes the exporter name listed on the "Exporter Page". For example, exporter "HazWasteABC" would save the completed document as "Export Annual Report - HazWasteABC - CY2010.xlsx". If different exporters have the same company name, please add the city where the site is located. For example, if "HazWasteABC" has separate exporter sites in Houston, TX and Memphis, TN that had unique consents to export, the Houston site would save the completed document as "Export Annual Report - HazWasteABC Houston - CY2010.xlsx" and the Memphis site would save it as "Export Annual Report - HazWasteABC Memphis - CY2010.xlsx".

(6) You may print out the "Exporter Page", "Waste Reduction Page" (if required to submit), and "Export Data by Destination" to create a hardcopy report for submittal. Please make sure that all required data is printed out per notes (4)(f) and (4)(g) above. If you choose to submit this print out as your official submittal, please remember to SIGN AND DATE on the printed "Exporter Page". It will not be a complete submittal without your signing and dating the exporter certification statement.

(7) Please email a copy of the completed document to "coughlan.laura@epa.gov, nelson.scott@epa.gov, tatum.jana@epa.gov", and list "Electronic Copy of Annual Report for CY2010" in the subject line of the email.

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Nelson, Scott

From: Coughlan, Laura
Sent: Tuesday, February 24, 2015 9:29 AM
To: bill.anderson@pcisynthesis.com
Cc: Nelson, Scott
Subject: FW: CY 2014 HazWaste Export report for PCI Synthesis
Attachments: removed.txt; CY2014 HazWaste Export Report signed..pdf; EPA Hazwaste export 2014 Cover ltr.docx; Export Annual Report-HazWastePCI-CY2014.xlsx

Thank you Bill. I have forwarded your annual report to Scott Nelson by cc'ing him on this email.

Laura L. Coughlan, P.E.
Environmental Scientist
International and Transportation Branch
U.S. EPA (5304P)
phone: 703-308-0005
fax: 703-308-0514

From: Anderson, Bill [mailto:Bill.Anderson@pcisynthesis.com]
Sent: Monday, February 23, 2015 5:38 PM
To: Coughlan, Laura
Subject: CY 2014 HazWaste Export report for PCI Synthesis

Ms. Coughlan;

Attached please find the signed CY2014 Hazwaste Export report and cover letter for PCI Synthesis, Newburyport , MA.

I have also attached the report in the excel format for you to download and process.

I can be reached at 978-463-4882 or by email at bill.anderson@pcisynthesis.com if you should have any questions.

Best Regards;

Bill Anderson

Environmental, Health & Safety Manager
978-463-4882: Phone
978-463-0045: Fax

TOGETHER. MOVING IDEAS FORWARD.