PCI Synthesis

January 11, 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. Robert Heiss

Dear Mr. Heiss;

In accordance with the instructions stated in your letter dated December 21, 2011, PCI Synthesis is submitting the 2010 annual report for the export of hazardous waste.

An electronic copy of the 2010 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.

Thank you and your office for the fast response and kind assistance in this matter. If there are any questions or concerns regarding this report or any other matter, please contact me by email; bill.anderson@pcisynthisis.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 2012

SON

PCI Synthesis

EHS MANAGER

Way
MA 01950

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL™

7011 1570 0002 8931 6171

UNITED STATES POSTAL SERVICE

1000 20460

U.S. POSTAGE PAID SALISBURY, MA 01952 JAN 13 '12 AMOUNT $6.23 00035562-07

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US Environmental Protection Agency
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1200 Pennsylvania Ave, NW
Washington, D.C. 20460

CY 2010 Hazardous Waste Export Report

Route **EPA Mail**

To: Federal Activities

Mailstop: ARIEL RIOS NORTH
Department: 2254A
Phone:
PKG Condition Certified

Scott

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:	**2010**

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:	1/11/12

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 Synthesis strives on a daily basis to minimize the amount of hazardous waste generated throughout the course of a year. Due to the nature of our operation as an active pharmaceutical manufacturer this is a cumbersome task and we try to reduce and recycle whenever we can. Each new process is thoroughly examined during the scale up process to minimize the waste generated and the solvents used in the reactions are recycled as the process chemistry allows. All of our exported waste from PCI to Chemrec was in fact recycled although managed as a RCRA hazardous waste.**
(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:	**Waste Acetone reduced from 69,777 lbs (RY 2009) to 39,776 lbs (RY 2010). Waste Methanol increased from 109,051 lbs (RY 2009) to 140,096 lbs in RY 2010. The changes in volume reflect the changes in product line and the need for that particular solvent. As production increases, the solvent use will increase as well.**

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	39,776	P	12	Freehold	NJD054126164	
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Methanol	D001, F003	N/A	3	140,096	P	13	Freehold	NJD054126164	
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Methylene chloride	F002	N/A	6.1	41,800	P	7	Freehold	NJD054126164	
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Toluene	D001, F005	N/A	3	62,568	P	12	Freehold	NJD054126164	
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Isopropanol/Butanol	D001, F003	N/A	3	149,358	P	13	Freehold	NJD054126164	
Chemrec, Inc.	190, rue Brousseau	Cowansville	Quebec	J2K 3G6	Canada	Ethyl Acetate	D001, F003	N/A	3	2054	P	4	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)