QUEBECOR
PRINTING (USA) CORP.

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To MICHELLE PRICE	From ANN PANTLE	
Co./Dept.	Co.	
Phone #	Phone #	
Fax #	Fax #	

Ms. Michelle Price
United States Environmental Protection Agency
Office of Pollution Prevention and Toxics
401 M Street S. W.
Washington, D.C. 20460

VIA FACSIMILE (202) 401 - 8142

Dear Ms. Price:

I understand that the TRI Branch of USEPA's Office of Pollution Prevention and Toxics has engaged Hampshire Research Associates, Inc. ("Hampshire") to research significant changes in reported amounts of TRI chemicals for identified industry groups. The environmental managers of Quebecor Printing Memphis Inc. and Quebecor Printing Richmond Inc. have advised me that they have been contacted for information regarding their respective toluene releases for the period between 1991 and 1996. Please know that we will provide the requested information.

The purpose of my letter is to communicate our disappointment with the lack of definitions and directions associated with TRI reporting.

As you may know, the Environmental Defense Fund (EDF) recently published a web site listing the major releasers of TRI chemicals. We accessed the information published on the web site and were surprised to find what we report as "recycled on-site" is listed as "production-related wastes". In Hampshire's letter of introduction to Tom Brown, the environmental manager at our Memphis plant, the same reference is made. We are very concerned about the designation of "production-related wastes", particularly since nowhere in the Form R instructions for Section 8 is the word "waste" ever used. The instructions in Section 8 ask for source reduction and recycling activities associated with toxic "chemicals", not "wastes".

The Quebecor plants that use toluene are publication rotogravure printers. We purchase ink that contains hydrocarbon solvents, some of which is toluene. The ink is pumped to the printing presses from aboveground storage tanks. At the printing units, dilution solvent is added to the raw ink to bring it to running viscosity. When the diluted ink is applied to the paper substrate it dries by evaporation. The evaporated solvent is captured and routed to a carbon adsorption system where it is adsorbed by the carbon. As the carbon nears saturation, it is regenerated by steam. The solvent/steam mixture is condensed into a liquid phase and then decanted. The water is reused as makeup to the boilers and the solvent is either reused on-site as dilution solvent or sold back to the ink vendors to formulate new batches of ink.

As you can see, we are not dealing with a "production-related waste", although we "recycle" production materials as part of our process.

After responding to several citizen inquiries arising from the EDF web site, I tried to investigate our reporting requirements further. I called the USEPA and spoke to a contractor who advised me that for purposes of TRI reporting there is no definition of "recycling". Consequently, the conversation was

meaningless, since the contractor couldn't give us any direction as to how to report the activity described above, if at all.

How such a critical activity like recycling can go without definition has resulted in a disservice not only to industry but also to the public, and environmental groups that purport to represent their interests. An environmental group, like EDF, publishes that a company like ours generates millions of pounds of "production-related wastes", and in absence, they're misinformed and our reputation is at stake.

What's as disturbing as the absence of a definition of "recycling" is the absence of the expression "production-related wastes" in the TRI instructions. The use of this phrase, easily misunderstood by the public, is now common by the USEPA when referring to Section 8. Had this expression ever been used in the instruction booklet, we would have rethought our method of reporting. Why is the term "production-related wastes" not used in Section 8?

It would appear that if the USEPA really means for industry to report only the "recycling" of production-related "wastes", we should be and always should have been reporting "zero" in Sections 8.4 and 8.5 (excepting a small amount of RCRA wastes containing toluene that are shipped off-site for fuels blending).

I look forward to a response.

Very truly yours,

Ann M. Pantle

Ann M. Pantle
Director of Environmental Affairs

Cc: John Howay, Hampshire Research Associates, Inc.