



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Ann M. Pantle  
Director of Environmental Affairs  
Quebecor Printing (USA) Corp.  
401 North Michigan Avenue  
Suite 1880  
Chicago, IL 60611

SEP 29 1998

Dear Ms. Pantle,

This letter is in response to your letter dated August 27, 1998, to Michelle Price of my staff concerning your Quebecor Printing Richmond and Quebecor Printing Memphis facilities' reporting of toluene under section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) and section 6607 of the Pollution Prevention Act (PPA).

You explain in your letter that as a result of EPA contractor calls to these facilities, you have researched how information submitted on EPCRA section 313 Form Rs is represented to the public. Specifically you have learned that the quantities of toluene these facilities have reported as recycled on-site in section 8 of the Form R are designated as production-related wastes by environmental groups such as the Environmental Defense Fund (EDF). In your letter you also express concern that EPA has not provided a definition of recycling for purposes of the Form R nor has it used the expression "production-related wastes" in EPA's document Toxic Chemical Release Inventory Reporting Forms and Instructions.

Pursuant to section 6607 of the Pollution Prevention Act, EPA has been collecting quantities of ~~the toxic chemical~~ that are released or are transferred off-site for further waste management ~~as a result of remedial actions, catastrophic events or other one-time events not associated with a production process~~ (section 8.8 of the Form R). These quantities are not expected to be amenable to source reduction efforts. Along with other waste management and source reduction information, EPA has also been collecting information on the quantities of toxic chemicals that are recycled, combusted for energy recovery, treated and released on- and off-site (sections 8.1 through 8.7 of the Form R). These waste quantities are amenable to source reduction activities (i.e., those quantities not associated with a catastrophic, remedial or one-time event) and are considered production-related wastes. EPA expects to repropose regulations (EPA originally proposed definitions at 56 FR 48475; September 26, 1991) to define these terms and others used in the collection of the PPA data elements in the summer of 1999. I hope that you

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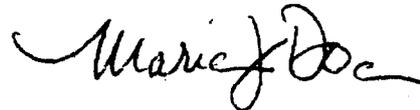
have an opportunity to comment on this reproposal.

In your letter, you also explain that these Quebecor Printing facilities use toluene in a dilution solvent that is added to raw ink to bring the ink to running viscosity. In the printing units, as the ink dries, the solvent evaporates off and is captured in a carbon adsorption system where it is adsorbed by the carbon. The solvent is then regenerated by steam, condensed into a liquid phase and then decanted. The water is reused as makeup in on-site boilers and the solvent is either reused on-site as a dilution solvent or sold back to the ink vendors to formulate new batches of ink. These facilities have been reporting the quantities of toluene reused on-site in dilution solvent as recycled on-site.

As mentioned above, EPA has not yet promulgated regulations pursuant to the Pollution Prevention Act defining "recycling." However, the fact pattern presented in your letter describes a situation in which quantities of toluene in solvents are recycled on-site. In general, EPA considers toxic chemicals as recycled when the toxic chemicals are recovered for reuse. A recovery step would include removing toxic chemicals from a pollution control device or removing contaminants from the toxic chemical after it has been used and can no longer be used for its intended purpose. In the case you describe, the toluene is recovered from a pollution control device and then separated from a water/carbon mixture for reuse in the production process. Because these quantities of toluene are recovered for reuse, they should be reported as recycled on-site in sections 7 and 8 of the Form R.

I hope this response is helpful in addressing your concerns. Please call me at 202.260.9592, or Sara Hisel McCoy of my staff at 202.260.7937, if you have any further questions on this matter.

Sincerely,



Maria J. Doa, PhD., Chief  
Toxics Release Inventory Branch

cc: Michelle Price  
Sara Hisel McCoy