



## CAMERON-COLE

July 18, 2002

United States Environmental Protection Agency  
OIAA  
Mail Code 2844  
1200 Pennsylvania Avenue NW  
Washington DC, 20460

**RE: Processing Threshold Clarification**

Dear Sir or Madam:

This letter is intended to clarify the EPCRA Section 313 definition, and application thereof, of the term "process" as it pertains to activity thresholds applicable to solvent recovery facilities. Cameron-Cole, LLC (Cameron-Cole) has verbally received confirmation (via the EPCRA hotline) that the following assumption can be applied to determining whether trace constituents present in the inbound waste solvents should be counted toward the processing threshold.

Cameron-Cole asserts that if an EPCRA Section 313 chemical is separated from the recycled solvent prior to solvent re-distribution into commerce, and the Section 313 chemical is then sent off-site for energy recovery in the distillation bottoms, the Section 313 chemical is not counted toward the "Processing" threshold. The following assumption from Question 472 of *EPCRA Section 313 Questions and Answers, Revised 1998 Version* is also included in this interpretation: "If the facility has no information to indicate that the [Section 313] chemical exists in the wastestream, it may assume the concentration is zero." There is no information to indicate the recovered solvent contains the Section 313 chemical in question.

Further, as noted in the September 23, 1998 response to Richard G. Stoll of Freedman, Levy, Kroll, & Simonds contained in Appendix D of *EPCRA Section 313 Questions and Answers, Revised 1998 Version*. EPA 745-B-98-004. December 1998, "the repackaging and subsequent transfer off-site of EPCRA section 313 toxic chemicals in waste fuel for burning for energy recovery is not, in itself, a covered "manufacturing," "processing," or "otherwise use" threshold activity".

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Please reply to the undersigned at Cameron-Cole, LLC., 5777 Central Avenue, Suite 100, Boulder, Colorado, 80301 or call Julie Chiaravalli at (303) 938-5522 if further clarification is needed.

Sincerely,



Julie Chiaravalli  
Environmental Scientist



Anthony Truschel  
Regional Manager