

July 22, 2008 VTC - - Dialouge Session Talking Points

1 Post Treatment - Off Site

Off Site Incineration - Baseline and Initial Target Reductions (GE program GPRA goals)

Off Site: Other Post Treatment activities

2 Post Treatment - On site

Baseline for stream flows to on site post treatment

Ability to separate soluble from insoluble

Stream diversions from off to on site post treatment

3 Separate / isolate

A Isolation / Separation of **Insoluble** streams:

Ability to divert to:

Energy Recovery - incineration

solvent recovery - solvent recovery / distillation

B Isolation / Separation of **Soluble** streams:

Ability to divert to:

Heat Integration - solvent recovery

4 Recoverability and new RCRA law, Revisions to the Definition of Solid Waste; Proposed Rule

40 CFR Pars 260 & 261, Monday, March 26, 2007

Ability to Recover solvent upstream

cost estimates with and without RCRA rule

5 Reduce, Recover, Reuse, Resale

Proposed improvements / metrics in each category

Reduce Ideal sets of solvents, process optimizations, reaction concentrations, power and steam

Reuse: High purity, focus on insoluble

3rd party markets: \$\$ toward resell of soluble after use as cooling / heating agent

6 Resell

3rd party markets - Tabs 5 & 6. Economics for soluble vs insoluble

additional support:

DOC / NIST / MEP - MEP in PR

Methanol Institute

PRMA as resource / Broker

7 Partnership Mechanism - collectively developed Public Domain / linkage with Performance Tracks

This is NOT an information collection and / or reporting exercise!!

8 Public Domain Home(s) for universal Database & Technology Transfer to industry and academia

* GE academic materials and Center for Sustainable Engineering

(supporting PPT)

* Prentice Hall Book Build *(supporting PPT)*

* Adapted EPA Sustainable Futures Workshops: covers property estimation and chemsteer tools, add GSK / NCU modules

Pollution Prevention and Stewardship in the Pharmaceutical Sector Initiative

Puerto Rico Manufacturing Association - July 3rd, 2008 Meeting Taking Points

Greetings! I just wanted to let you know that last week I met with two pharmaceutical representatives from Pfizer and the Puerto Rico Manufacturing Association (PRMA). As part of the meeting, we discussed the upcoming video conference event for which they showed a genuine enthusiasm, and expressed some general comments that I truly believe we should focus before the event as follows:

- They wanted to know how the partnership building for the business case development would function (step by step), and what would be required for them to do as participants. The invitation letter from EPA HQ is of utmost importance in order to justify their participation;
- They also wanted to know the main objective of the pilot project, long term commitments, timeframes, legal implications, and public appearance (information dissemination);
- They were interested on how to use the model software based on the TRI data. In the event that they become a participant, they would like to provide you with more specific data from their manufacturing processes;
- They asked details about the Solid Waste Final Rule and the expected date to be signed.
- It was mentioned that an effort can be made to deviate solvents from incineration destination, but needed to know about alternate disposal options, and a list of contacts regarding the 3rd Party Market Exchange;
- They asked about the pilot project metrics, project realistic goals, and specific timeline;
- They asked about the relationship between this pilot project and Performance Track, since they would like to get credits as participants;
- They wanted more details about individual technical assistance for the pilot project;
- It was mentioned if EPA can assist the local government environmental offices such as the Environmental Quality Board (EQB) and the Solid Waste Management Authority (SWMA) to become acquainted with the project efforts, and to be involved;
- They asked about the upcoming AICHE Convention and what would be presented about the project; and,
- If there would be any environmental recognition or incentives for the participants.

Chemical: **METHANOL**

CAS

Number: 67-56-1

Health Hazard

Recognized: --

Suspected: [Developmental Toxicant](#)

[Gastrointestinal or Liver Toxicant](#)

[Kidney Toxicant](#)

[Neurotoxicant](#)

[Respiratory Toxicant](#)

[Skin or Sense Organ Toxicant](#)

[Regulatory Coverage](#)
[5 federal regulatory lists.](#)

[Air Contaminants \(Occupational and Safety Health Act\)](#)

[Hazardous Air Pollutants \(Clean Air Act\)](#)
[Hazardous Substances \(Superfund\)](#)

[Registered Pesticides \(Federal Insecticide, Fungicide, and Rodenticide Act\)](#)

[Toxic Release Inventory Chemicals](#)

[Chemical Use Profile](#)

[This is a high volume chemical with production exceeding 1 million pounds annually in the U.S.](#)

[Used in at least 17 industries.](#)

Reference(s) **Which Industries Use This Chemical?**

[How is the Chemical Used in This Industry?](#)

[CERHR](#)
[JANK](#)
[OEHHA-CREL](#)
[RTECS](#)

[MERCK](#)

[DAN EPA-](#)
[HEN EPA-](#)
[SARA](#)
[RTECS](#)
[EPA-](#)

Antifreezing Agents

De-icing agents

Electroplating

Electroplating - Cold-cleaning Solvents
Electroplating - Vapor Degreasing Solvents

Electroplating

Heat Transferring Agents **Secondary Coolants**

Laboratory Chemicals

Solvents - Dilution

Laboratory Chemicals

Solvents - Extraction
Solvents - Liquid

Laboratory Chemicals

Chromatography
Solvents - Machinery

Machinery Mfg and Repair

Manufacture and Repair

Paint Manufacture

Alcohol Solvents - Paint
Solvents - Paint

Paint Stripping

Stripping
Outer Layer

Printed Circuit Board Manufacturing
Printed Circuit Board Manufacturing

Etch/Plate - Print Circ Brd Mfg
Inner Layer Etching - Print Circ Brd Mfg

Printed Circuit Board Manufacturing

Making PCB Holes
Conductive

Pharmaceuticals Mfg

Solvents -

Paper Coating

Pharmaceuticals

Solvents

Solvents - Herbicide

Pesticide Mfg (Herbicides)

Manufacture

Solvents - Insecticide

Pesticide Mfg (Insecticides)

Manufacture

Solvents for Equipment

Printing

Cleaning

Diazo-type Materials -

Reprographic Agents

Misc. Chemicals

Solvents - Rubber

Rubber Manufacture

Manufacture

Semiconductors

Cleaning - Semiconductors

Wood Stains and Varnishes

Varnish Solvents

Chemical: **DICHLOROMETHANE**

CAS Number: 75-09-2

[Human Health Hazards](#)

Health Hazard

Recognized: **Carcinogen**

Suspected: [Cardiovascular or Blood Toxicant](#)

[Endocrine Toxicant](#)

[Gastrointestinal or Liver Toxicant](#)

[Kidney Toxicant](#)

[Neurotoxicant](#)

[Reproductive Toxicant](#)

[Respiratory Toxicant](#)

[Air Contaminants
\(Occupational and Safety
Health Act\)](#)

[Hazardous Air Pollutants
\(Clean Air Act\)](#)

[Hazardous Constituents
\(Resource Conservation and
Recovery Act\)](#)

[Hazardous Substances
\(Superfund\)](#)

[Maximum Contaminant
Levels \(Safe Drinking Water
Act\)](#)

[Priority Pollutants \(Clean
Water Act\)](#)

[Registered Pesticides \(Federal
Insecticide, Fungicide, and
Rodenticide Act\)](#)

[Toxic Release Inventory
Chemicals](#)

[Regulatory
Coverage](#)

[On at least 8
federal
regulatory lists.](#)

Bold: Lists methanol is not on

[Chemical Use Profile](#)

[This is a high volume chemical
with production exceeding 1
million pounds annually in the
Used in at least 10 industries.](#)

Reference(s)

[P65
KLA
OEHHA-
RTECS](#)

[ATSDR
RTECS
RTECS
ATSDR
DAN EPA-
HEN
FRAZIER
JANK
RTECS](#)

**Which Industries Use
This Chemical?**

Circuit Board Manufacture
Electroplating
Electroplating
Integrated Iron and Steel
Mfg
Laboratory Chemicals
Laboratory Chemicals
Laboratory Chemicals
Metal Degreasing
Paint Stripping
Paper Coating
Pesticide Mfg (Insecticides)
Pharmaceuticals Mfg
Wood Stains and Varnishes
Wood Stains and Varnishes

[How is the Chemical
Used in This Industry?](#)

Image Photostrippers
Electroplating - Cold-
cleaning Solvents
Electroplating - Vapor
Degreasing Solvents
Solvents - Steel
Solvents - Dilution
Solvents - Extraction
Solvents - Liquid
Chromatography
Solvents - Metal
Degreasing
Solvents - Paint
Stripping
Solvents
Solvents - Insecticide
Manufacture
Solvents -
Pharmaceuticals
Resin Solvents
Varnish Solvents

Performance Track Indicators

LCI Post Treatment Model Outputs & Company Inputs

General		Detailed		
Indicator	Category	Indicator	LCI post Treatment Model Output	Company Input
	Life Cycle Stage: Upstream			kg solvent to post treatment
Use of Recycled / Reused Materials	Material Procurement	Recycled content		x
		Hazardous/toxic components		x
	Life Cycle Stage: Inputs			
Use of Recycled / Reused Materials	Material Use	Materials used	x	
		Hazardous materials used	x	
		Total packaging materials used		x
		Reused or recycled materials used	x	
Total Water Used	Water Use	Total water used	Water incinerated; TOC, BOD, COD, TDS	
Non-Transportation Energy Use	Energy Use	Total (non-transportation) energy use	x	
Greenhouse Gas Emissions		Transportation energy use		
	Life Cycle Stage: Nonproduct Outputs			
Greenhouse Gas Emissions	Air Emissions	Total greenhouse gases	CO2, CH4	
Air Emissions		Volatile organic compounds (VOCs)	x	
		Nitrogen oxides (NOx)	x	
		Sulfur oxides (SOx)	x	
		Carbon monoxide	x	
		Air toxics	x	
Water Discharges	Discharges to Water	Non-toxic discharges to water	x	
		Toxic discharges to water	x	
Non-hazardous waste	Waste	Non-hazardous waste	x	
Hazardous Waste		Hazardous waste	x	
	Life Cycle Stage: Downstream			
		Waste to air, water, land from disposal or recovery	cumulative output streams from post-treatment modules	

\$\$\$\$ saved

MANUFACTURE

INPUTS

100 kg primary

Solvents

Solvents

Water

Buy-ins / Starting Materials

>99% purity
Feedstocks

Mass Transfer / React:
Reactors
Batch & Continuous

Reacted Feedstock

Separate:
Dehydration
Crystallization
Distillation
Washing

1 kg API Product

1 kg API generates
100 kg Waste

OUTPUTS

100 kg 'secondary'

Releases

Base Line Measurements

On-site Post Treatment

Off-Site Post Treatment

Company / Model Inputs:

- * Solvent type and KG
- * Solvent MW, #carbons, VP, solubility, density
- * Current 'destination' - off-site incineration, on site WWT

Company output: Stream diversion, \$\$\$ for change

Goals:

- Reduce / Eliminate Recover (RCRA)
- Reuse
- Resell (3rd party markets)

POST TREATMENT Activities / Models

Landfill

Solvent Recovery

WWT (Waste Water Treatment)

Incineration

Onsite

Off Site

Onsite / Energy Recovery

Indicator - Model Output

- * Total Water Used
- * Air Emissions
- * Greenhouse Gas Emissions
- * Non-Transportation Energy Use
- * Non-Hazardous Waste
- * Hazardous Waste
- * Use of Recycled / Reused
- * Non-Toxic Discharges To Water

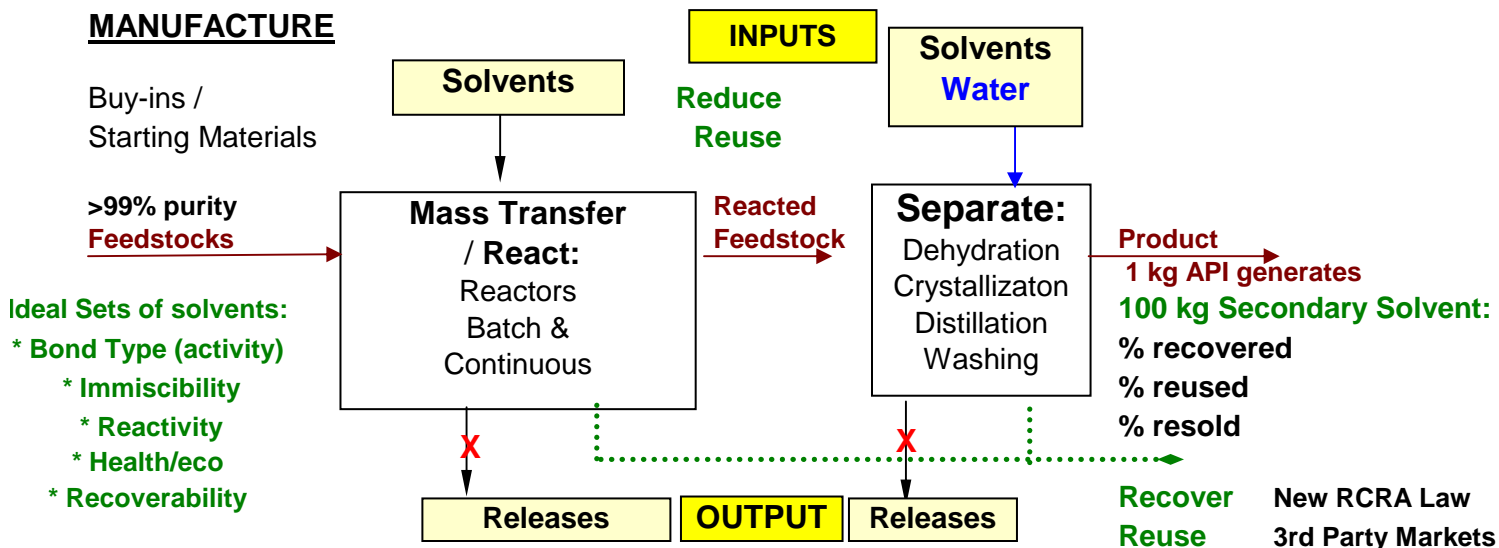
Energy:

Power
Heating
Cooling
Transport

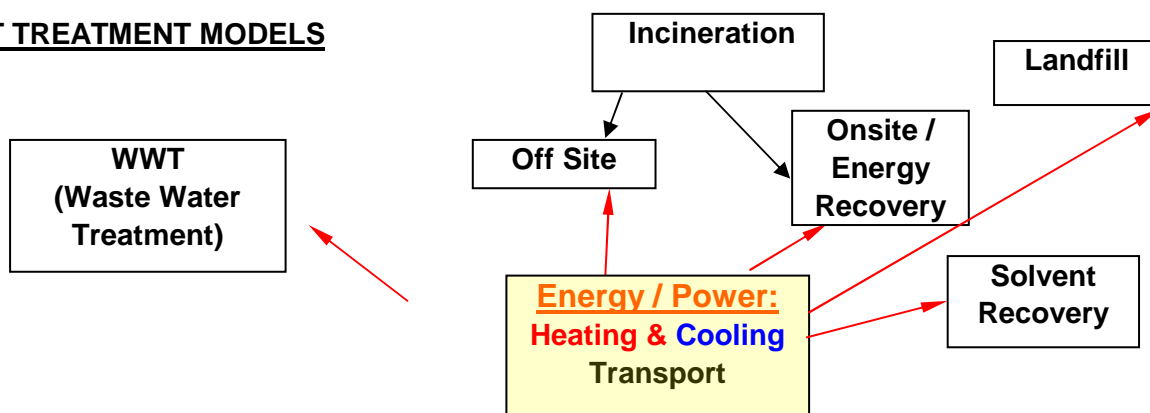
Principles:

- 1 - Isolate water carrying (soluble) from insoluble streams
- 2 - Reduce streams going to post-treatment (recover/reuse)
- 3 - Divert insoluble streams to recovery / incineration
- 4 - Divert soluble streams to heat exchange and resale

Reduce, Recover, Reuse, Resell Opportunities and Principles



POST TREATMENT MODELS



Puerto Rico - ALL Energy Needed (BTUs) 348 Billion
 24,270,243 lbs GHG (metric tons) 7,820

Puerto Rico 2006 TRI Chemical	Pounds Offsite Incinerated	other uses**	Solubility / water content
METHANOL	8,153,854	17	50% solvent / 50% H2O
ACETONITRILE	3,130,686	4	50% solvent / 50% H2O
N,N-DIMETHYLFORMAMIDE	875,768	4	50% solvent / 50% H2O
N-BUTYL ALCOHOL	249,913	2	50% solvent / 50% H2O
Soluble Pounds	12,410,221	6	50% solvent / 50% H2O
DICHLOROMETHANE	10,770,577	10	98.7% DCM
TOLUENE	1,089,445	13	assume no water content
Insoluble Pounds	11,860,022		
Total Pounds	24,270,243		

Bold: Carcinogen **scorecard.org

PR - Pfizer

Total Off Site Incinerated: 13,213,097 lbs
 Energy Needed (BTUs) 171 Billion
 GHG (metric tons) 3,870

PR - Bristol

Total Off Site Incinerated: 3,302,436 lbs
 Energy Needed (BTUs) 37 Billion
 GHG (metric tons) 825

4R Principles

- * Target / Eliminate High Risk materials
- * Substitute Hazardous with Non-Hazardous Materials
- * Reduce streams going to post treatment
- * Use insoluble for solvent recovery & reuse and onsite incineration (ER)
- * Use soluble for heat exchange, reuse and resale to 3rd Party Markets

**Puerto Rico - All
Incineration treatment module calculation sheet**

Puerto Rico - All	EPA TRI Solvents	Off Site Incineration
Calculation basis=	24,270,033.00 Pounds	348 Billion BTUs
		7820 Metric Tons GHG

Information needed (enter in the yellow cells)

Name of the organic substances to be incinerated	Molecular weight	Number of Carbon atoms in formula	Amount to be incinerated [kg]	Organic carbon to incinerator [kg]
methanol	32	1	839,565	314,837
dichloromethane	84.9	1	2,189,198	309,427
toluene	92.13	7	224,354	204,556
acetonitrile	41	2	322,358	188,697
N,N-dimethylformamide	73	3	90,175	44,470
n-butyl alcohol	74.12	4	25,733	16,665
				0
Total Carbon to incinerator [kg] =				1,078,652
Total Organics to incinerator [kg] =				3,691,383
Total aqueous to incinerator [kg]				1,306,291
BTUS			Energy Recovered (%)	0%
Energy needed = [MJ of Natural gas]	55,376,493	348	Energy Recovered (MJ of Steam)	0
348 Billion BTUs				

GHG Metric Tons: 7,820	Total from incinerator	From incineration process	Energy usage-related	Energy recovery-related
Air emission [kg]				
CH4	8,860.30		8.86E+03	0.00E+00
CO	2,646.73	1.73E+03	9.21E+02	0.00E+00
CO2	7,812,361.16	3.92E+06	3.90E+06	0.00E+00
NM VOC	21,869.48	1.73E+02	2.17E+04	0.00E+00
NOx	12,358.47		1.24E+04	0.00E+00
SOx	1,480.33		1.48E+03	0.00E+00
Water emission [kg]				
TOC	1.32		1.32E+00	0.00E+00
BOD	0.23		2.30E-01	0.00E+00
COD	3.79		3.79E+00	0.00E+00
TDS	1.51E+02		1.51E+02	0.00E+00
Solid waste [kg]	4,859.16		4.86E+03	0.00E+00

Puerto Rico 2006 TRI Chemical	Off Site Incinerated		RCRA	other uses
	Pounds	Kilograms		
METHANOL	8,153,854	3,698,588	Y	17
ACETONITRILE	3,130,686	1,420,079	Y	4
N,N-DIMETHYLFORMAMIDE	875,768	397,248	Y	2
N-BUTYL ALCOHOL	249,913	113,361	Y	6
	12,410,221	5,629,276		
DICHLOROMETHANE	10,770,577	4,885,534	Y	10
TOLUENE	1,089,445	494,172	Y	13
	11,860,022	5,379,706		

**Total Off Site Incinerated: 24,270,243 11,008,982
348 Billion BTUs**

Bold: Carcinogen

7,820 Metric Tons GHG

Summary - Including Companies

Puerto Rico

Total Off Site Incinerated: 24,270,243 pounds

348 Billion BTUs

7820 Metric Tons GHG

Pfizer

Total Off Site Incinerated: 13,213,097 pounds

171 Billion BTUs

3,870 Metric Tons GHG

Bristol

Total Off Site Incinerated: 3,302,436 pounds

37 Billion BTUS

825 metric tons GHG

Pfizer - Arcibo and Barceloneta
 Incineration treatment module calculation sheet

EPA TRI Solvents	Off Site Incineration
Calculation basis= 13,213,097.00 Pounds	171 Billion BTUs 3,870 Metric Tons GHG

Information needed (enter in the yellow cells)

Name of the organic substances to be incinerated	Molecular weight	Number of Carbon atoms in formula	Amount to be incinerated [kg]	Organic carbon to incinerator [kg]
methanol	32	1	428,295	160,611
dichloromethane	84.9	1	1,505,270	212,759
toluene	92.13	7	101,578	92,614
acetonitrile	41	2	47,123	27,584
n-hexane	87.17	6	9,944	8,213
N,N-dimethylformamide	73	3	41,056	20,247
n-butyl alcohol	74.12	4	25,733	16,665
				0
Total Carbon to incinerator [kg] =				538,692
Total Organics to incinerator [kg] =				2,158,998
Total aqueous to incinerator [kg]				571,719
			BTUs	Energy Recovered (%) 0%
Energy needed = [MJ of Natural gas] 27,122,983			171	Energy Recovered (MJ of Steam) 0

171 Billion BTUs

8,520 Metric Tons GHG	Total from incinerator	From incineration process	Energy usage-related	Energy recovery-related
Air emission [kg]				
CH4	4,339.71		4.34E+03	0.00E+00
CO	1,312.95	8.62E+02	4.51E+02	0.00E+00
CO2	3,864,102.88	1.96E+06	1.91E+06	0.00E+00
NM VOC	10,713.17	8.62E+01	1.06E+04	0.00E+00
NOx	6,053.09		6.05E+03	0.00E+00
SOx	725.05		7.25E+02	0.00E+00
Water emission [kg]				
TOC	0.65		6.49E-01	0.00E+00
BOD	0.11		1.13E-01	0.00E+00
COD	1.86		1.86E+00	0.00E+00
TDS	7.38E+01		7.38E+01	0.00E+00
Solid waste [kg]				
	2,379.98		2.38E+03	0.00E+00

PR - Pfizer
 13,213,097 lbs
 TRI Chemical

Energy Needed (BTUs)
 GHG (metric tons)
 Arcibo Barceloneta

171 Billion
 3,870
 Total = Pounds kilograms

METHANOL	2,116,461	2,043,068	4,159,529	1,886,762
ACETONITRILE	440,050	17,600	457,650	207,590
N,N-DIMETHYLFORMAMIDE	285,728	113,000	398,728	180,863
N-BUTYL ALCOHOL	249,913	0	249,913	113,361
	3,092,152	2,173,668	5,265,820	
DICHLOROMETHANE	7,103,738	302,000	7,405,738	3,359,243
TOLUENE	142,354	350,900	493,254	223,740
N-HEXANE	48,285	0	48,285	21,902

	7,294,377	652,900	7,947,277	2,388,576
Totals	10,386,529	2,826,568	13,213,097	

Total Off Site Incinerated:

3,870 Metric Tons GHG

Bristol Myers Humaco and Barceloneta Incineration treatment module calculation sheet

EPA TRI Solvents	Off Site Incineration
Calculation basis= 3,302,436.00	37 Billion BTUS 825 metric tons GHG

Information needed (enter in the yellow cells)

Name of the organic substances to be incinerated	Molecular weight	Number of Carbon atoms in formula	Amount to be incinerated [kg]	Organic carbon to incinerator [kg]
methanol	32	1	123,610	46,354
dichloromethane	84.9	1	417,471	59,006
toluene	92.13	7	9,874	9,003
N,N-dimethylformamide	73	3	10	5
				0
Total Carbon to incinerator [kg] =				114,368
Total Organics to incinerator [kg] =				550,966
Total aqueous to incinerator [kg]				129,048
BTUs				Energy Recovered (%)
Energy needed = [MJ of Natural gas]				0%
5,809,047				Energy Recovered (MJ of Steam)
				0

37 Billion BTUS

825 metric tons GHG	Total from incinerator	From incineration process	Energy usage-related	Energy recovery-related
Air emission [kg]				
CH4	929.45		9.29E+02	0.00E+00
CO	279.59	1.83E+02	9.66E+01	0.00E+00
CO2	823,940.43	4.15E+05	4.09E+05	0.00E+00
NM VOC	2,294.32	1.83E+01	2.28E+03	0.00E+00
NOx	1,296.42		1.30E+03	0.00E+00
SOx	155.29		1.55E+02	0.00E+00
Water emission [kg]				
TOC	0.14		1.39E-01	0.00E+00
BOD	0.02		2.41E-02	0.00E+00
COD	0.40		3.97E-01	0.00E+00
TDS	1.58E+01		1.58E+01	0.00E+00
Solid waste [kg]	509.73		5.10E+02	0.00E+00

TRI Chemical	Humacao	Barceloneta	Total Pounds	kilograms
METHANOL	8,400	1,192,083	1,200,483	544,539
DICHLOROMETHANE	21,701	2,032,203	2,053,904	931,651
TOLUENE	0	47,948	47,948	21,749
N,N-DIMETHYLFORMAMIDE	0	101	101	46
Totals	30,101	3,272,335	3,302,436	1,497,985

Bold: Carcinogen

**37 Billion BTUS
825 metric tons GHG**