

EHS Committee

Pine Chemicals Association

Guidance Document



DISTILLED TALL OIL BLENDING

Over a period beginning back in 1991 the Pine Chemicals Association successfully negotiated agreements with the US Environmental Protection Agency (USEPA) to allow tall oil manufacturers to add tall oil fatty acids (TOFA) and/or tall oil rosin (TOR) to distilled tall oil (DTO) and not create a mixture under the Toxic Substances Control Act (TSCA) rules. This confirmed the acceptability of industry practices, gave the manufacturers flexibility and reduced the potential regulatory burden on their customers.

The substance of these agreements is contained in two letters from the USEPA dated July 29, 1993 and March 26, 2004. Both are posted on this website and should be carefully consulted. In essence the first allows enrichment of DTO with TOFA and/or TOR at the site of manufacture of all components; the second allows this enrichment at any tall oil fractionation site with fractions from any domestic tall oil manufacturer.

The purpose of this document is to provide the following guidance to PCA members in interpreting the 2004 letter based on the meetings with and letters to and from USEPA and members of the PCA EHS Committee.

1. Only DTO manufacturers (i.e. distillers) may blend DTO with TOFA and/or TOR and maintain its TSCA designation as DTO.
2. The amounts of TOFA and/or TOR added to the DTO to meet quality control and customer specifications should be the minimum required to achieve the desired effects (for example, crystallization control or composition adjustment).
3. It is NOT acceptable to create DTO by mixing TOFA and TOR only, or blending large amounts of TOFA and TOR with small (minimal) amounts of DTO.

If there are any other questions as to the intent of the USEPA letters, the PCA EHS Committee should be contacted.