Toxics Release Inventory

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Toxics Release Inventory Reporting Requirements

Do I Need to Report?

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WHO MUST REPORT?

- **Facilities in covered primary Standard Industrial Classification code(s) and federal facilities; <u>and</u>**

- **With 10 or more full-time employees (equivalent of 20,000 hours per year); <u>and</u>**

- **Chemical-by-Chemical Determination**

  - **That exceed "manufacture", and/<u>or</u> "process", and/<u>or</u> "otherwise use" thresholds for each TRI chemical.**

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- **COVERED Standard Industrial Classification CODES**

Industrial Sector	Primary SIC Code
Manufacturing	20-39
Metal mining	10 (except 1011, 1081, and 1094)
Coal mining	12 (except 1241)
Electric utilities	4911, 4931, and 4939, limited to facilities that combust coal and/or oil for the purpose of generating electricity for distribution in commerce
Treatment, Storage, and Disposal facilities	4953, (limited to facilities regulated under the Resource Conservation and Recovery Act, Subtitle C, 42 U.S.C. Section 6921 *et seq*.)
Solvent recovery services	7389, limited to facilities primarily engaged in solvent recovery services on a contract or fee basis
Chemical distributors	5169
Petroleum bulk terminals	5171

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SECTION 313 CHEMICALS AND CHEMICAL CATEGORIES

◆ **Current list contains about 650 individual chemicals and chemical categories (See Table II of the EPA's TRI Reporting Forms and Instructions (RF&I) document).**

◆ **The list can change – based on petitions pursuant to statutory requirements.**

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THRESHOLD QUANTITY VS. RELEASE AND OTHER WASTE MANAGEMENT QUANTITIES

◆ **IF chemical activity quantity exceeds the threshold for manufacture, process, or otherwise use, you must report for this chemical, REGARDLESS of the amount of the chemical released or otherwise managed as waste (*i.e.*, recycling, treatment, and energy recovery).**

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◆ *What is reported on the FORM R?*

- Part I
  - Facility Information
    - Facility name
    - Address
    - Certification
    - Technical and public contact
    - SIC code(s)
    - ID numbers
    - Parent company information

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- **Part II of Form R:**
  - **Chemical identification, uses, and maximum quantity on-site during the reporting year**
  - **Quantities released on-site to air, land, water**
  - **Quantities transferred off-site for waste management**
  - **Description of on-site treatment, recycling, and energy recovery**
  - **Pollution Prevention Tracking:**
    - **Total quantities released and total quantities recycled, treated, or energy recovered for past year, current year, and upcoming years**
    - **Description of source reduction activities**

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An example of a portion of the Form R:

PART II. Section 5: Releases to Land On-Site

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE (continued)			
	NA	A. Total Release (pounds/year*)(enter range code or estimate**)	B. Basis of Estimate (enter code)
5.4.1 Underground Injection onsite to Class I Wells	☐		
5.4.2 Underground Injection onsite to Class II-V Wells	☐		
5.5 Disposal to land onsite			
5.5.1A RCRA Subtitle C landfills	☐		
5.5.1B Other landfills	☐		
5.5.2 Land treatment/application farming	☐		
5.5.3A RCRA Subtitle C surface impoundments	☐		
5.5.3B Other surface impoundments	☐		
5.5.4 Other disposal	☐		

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HOW TO REPORT

- **File a TRI report (a Form R or a Form A Certification Statement) for each Section 313 chemical exceeding an activity threshold**

- **Submit to U.S. EPA, and either designated state officials or designated tribal office by July 1st for preceding calendar year's activities**

  - **July 1, 2005 (January 1 - December 31, 2004 activities)**

- **Approximately 23,000 facilities file a total of 90,000 forms each year.**

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◆ **Important dates / timeframes:**

◆ **July 1: Reporting deadline for preceding calendar year**

◆ **November: Electronic facility data release – facility reporting forms made publicly available (*e.g.*, November 2005 for 2004 data)**

◆ **April / May: Public Data Release – analyzed, searchable data (*e.g.*, May 2005 for 2003 data)**

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What assistance is offered to help facilities determine if TRI reporting is required, and if reporting is required, what tools are available to help complete and submit the reporting forms?

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◆ **TRI WEBSITE**: **www.epa.gov/tri**

- **Program Updates (*e.g.*, proposed rules)**
- **Guidance Documents**
  - **Q & A**
  - **Industry Specific**
  - **Chemical Specific**
- **Reporting Forms & Instructions**
- **TRI workshops**
- ***TRI-ME* Software**
- **Regional and State TRI Contacts**
  - **Hotline: (703) 412-9810**

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TRI REPORTING SOFTWARE

◆ **The TRI-Made Easy *(TRI-ME)* Reporting Software is mailed to facilities with the Reporting Forms and Instructions package.   *TRI-ME* can also be downloaded from www.epa.gov/tri.**

◆ **The *TRI-ME* software is an interactive, intelligent, user-friendly software program that assists facilities in determining and completing their TRI reporting obligations.**

◆ **Guides facilities in completing the Form R by explaining each element of the form through a questionnaire format.**

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TRI-ME REPORTING SOFTWARE

- ◆ **Prevents facilities from making common errors while completing the Form R.**

- ◆ **Checks (validates) the forms to identify critical errors that must be corrected before submitting the forms to EPA. Also, suggests potential errors for user review.**

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TRI-ME REPORTING SOFTWARE

◆ **Allows electronic Internet submission of TRI forms via the EPA's Central Data Exchange (CDX), which is the point of entry on the Environmental Information Exchange Network (Exchange Network) for environmental data exchanges to the Agency.**

◆ **Security – Your information is protected by username and password (and secret question/answer) that you create.**
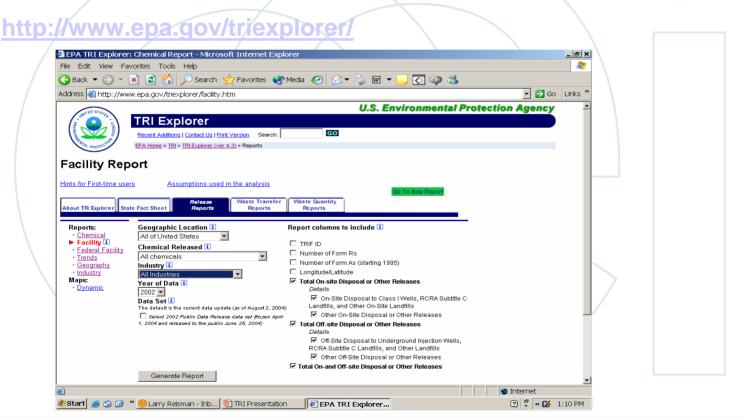
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Accessing and Using the TRI Data

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Data Access

- The Public Data Release (PDR) is an annual report that provides a general overview of that reporting year's (RY) TRI data and information on trends.

- The PDR is available every year on the TRI Website:
  - http://www.epa.gov/tri/tridata/index.htm#pdr

- The PDR is comprised of the following:
  - An overview brochure
  - Summary of Key Findings – offers a closer look at the major findings and trends
  - Results in Context – offers background and history of the TRI Program
  - Data Tables and Charts

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Data Access

TRI Explorer provides fast and easy access to the TRI data:

http://www.epa.gov/triexplorer/

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TRI Data Uses

- **How Are the Toxics Release Inventory Data Used?**
  - **A report that contains case studies of government, business, academic and citizen uses.**
  - **www.epa.gov/tri/guide_docs/2003_datausepaper.pdf**

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Program Updates

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TRI forms Modification Rule -- Federal Register Notice *(39931 Federal Register / Vol. 70, No. 132, Tuesday, July 12, 2005)*

◆ **This final rule eliminates certain information from the TRI reports, simplifies other reporting elements, and in some cases, reduces duplicate data collection.**

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Form A Eligibility Proposal

- **Proposed Rule to reduce the reporting burden associated with the TRI reporting requirements by increasing eligibility for the Form A Certification Statement.**

- **The rule was published on October 4, 2005.**

- **The comment period closes on December 5, 2005.**

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Form A Eligibility Proposal (*cont*.):

◆ In a separate but related action to the proposal expanding Form A eligibility, EPA notified Congress, as required by statute, that the Agency plans to initiate a rulemaking to modify the frequency of reporting under the TRI program.

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