



EPA 260-R-15-001  
OMB Control Number: 2025-0009  
December 2014

# **Toxic Chemical Release Inventory Reporting Forms and Instructions**

*Revised 2014 Version*

**Section 313  
of the Emergency Planning and  
Community Right-to-Know Act**  
(Title III of the Superfund Amendments  
and Reauthorization Act of 1986)

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**Paperwork Reduction Act Notice:** The annual public burden related to the Form R, which is approved under OMB Control No. 2025-0009, is estimated to average 35.71 hours per response for a facility filing a report on one chemical. The annual public burden related to the Form A, which is also approved under OMB Control No. 2025-0009, is estimated to average 21.96 hours per response for a facility filing a report on one chemical.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Include the EPA ICR number and OMB control number in any correspondence.

The completed forms should be submitted in accordance with the instructions accompanying the form, or as specified in the corresponding regulation.

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## *List of Acronyms*

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### **List of Acronyms**

ARA	Annual Reportable Amount	NHD	National Hydrography Dataset
BIA	Bureau of Indian Affairs	NON	Notice of Non-Compliance
CAS	Chemical Abstract Services	NOSE	Notice of Significant Error
CBI	Confidential Business Information	NOTE	Notice of Technical Errors
CDX	Central Data Exchange	NPDES	National Pollutant Discharge Elimination System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act	NTP	National Toxicology Program
CFR	Code of Federal Regulations	OMB	Office of Management and Budget
D&B	Dun & Bradstreet	OSHA	Occupational Safety and Health Act
DMR	Discharge Monitoring Report	P2	Pollution Prevention
DPC	Data Processing Center	PACs	Polycyclic Aromatic Compounds
DQA	Data Quality Alert	PBBs	Polybrominated Biphenyls
EBDCs	Ethylenebisdithiocarbamic Acid, Salts and Esters	PBT	Persistent Bioaccumulative Toxic
eFDP	Electronic Facility Data Profile	PCBs	Polychlorinated Biphenyls
EPA	Environmental Protection Agency	POTW	Publicly Owned Treatment Works
EPCRA	Emergency Planning and Community Right to Know Act	PPA	Pollution Prevention Act
ESA	Electronic Signature Agreement	RCRA	Resource Conservation and Recovery Act
FDP	Facility Data Profile	RSEI	Risk Screening Environmental Indicators
FIPS	Federal Information Processing Standard	RY	Reporting Year
FR	Federal Register	SBREFA	Small Business Regulatory Enforcement Fairness Act
GOCO	Government-Owned, Contractor-Operated	SIC	Standard Industrial Classification
IARC	International Agency for Research and Cancer	TDX	TRI Data Exchange
ICR	Information Collection Request	TRI	Toxics Release Inventory
MSDS	Material Safety Data Sheets	TRIFID	Toxics Release Inventory Facility Identification Number
NA	Not Applicable	TRIPS	Toxics Release Inventory Processing System
NAICS	North American Industry Classification System	UIC	Underground Injection Control
NDC	Non-Technical Data Changes	USC	United States Code
		USGS	United States Geological Survey
		VOCs	Volatile Organic Compounds

## Important Information for Reporting Year (RY) 2014

### *New Information for RY 2014*

Please note that this version of the Toxic Chemical Release Inventory (TRI) Reporting Forms and Instructions document supersedes previous versions.

- **New TRI Chemicals:**

- **Nonylphenol Category**

A rule was published on [September 30, 2014, \(79 FR 58686\)](#) adding a nonylphenol category to the TRI list of reportable chemicals. Facilities that manufacture, process, or otherwise use nonylphenol should begin collecting release information on the chemical during 2015. Reporting forms will be due July 1, 2016 for nonylphenol if TRI chemical use and other thresholds are met.

- **O-Nitrotoluene**

A final rule was published on [November 7, 2013 \(78 FR 66848\)](#) to add o-nitrotoluene to the list of chemicals required for TRI reporting. Facilities are required to submit TRI forms for RY 2014 activities, due July 1, 2015, if TRI chemical use and other thresholds are met.

- **Facilities May Now Submit Optional Facility-Level Information in TRI-MEweb Without Submitting a Form R or Form A**

You can now use TRI-MEweb to update location and contact information for your facility without having to submit a TRI reporting form. Additionally, without submitting a TRI reporting form, you can now use TRI-MEweb to indicate that your facility will no longer be reporting to TRI or will not be submitting a form for one or more specific TRI-listed chemicals for the current reporting year.

- **Optional Field for Reach Code of Receiving Streams or Water Bodies**

In Section 5.3, you are required to enter the names of the streams or water bodies to which your facility directly discharges a reportable EPCRA Section 313 chemical. Beginning in Reporting Year (RY) 2014, you may enter the 14-digit reach code assigned to each receiving

water body by the United States Geological Survey's (USGS) National Hydrography Dataset (NHD). Doing so will ensure that EPA and other researchers map your discharges to the correct stream reach when conducting analyses. TRI-MEweb will automatically populate the appropriate reach code when you select your receiving water body on the map provided in the user interface for this section.

- **Reporting Production or Activity Ratio**

Beginning in RY 2014, you are required to indicate whether the ratio you are reporting in Section 8.9 is a production ratio or an activity ratio. EPA has also clarified the instructions for this Section and added new examples to help you select the appropriate variable to use in calculating this ratio.

- **Estimated Annual Reduction for Source Reduction Activities**

Beginning in RY 2014, you may provide an optional percentage range indicating the estimated annual reduction in chemical waste generation associated with any source reduction activity(s) you have reported in Section 8.10. If you choose to complete this field, the reductions associated with your pollution prevention efforts will be featured on EPA's website through the TRI Pollution Prevention Search Tool at [www.epa.gov/tri/p2](http://www.epa.gov/tri/p2).

- **Optional Checkboxes in Section 8.11 for Barriers to Source Reduction**

Beginning in RY 2014, TRI-MEweb will provide a pick-list of categories that you may use to report barriers your facility faces with respect to source reduction. You may also elaborate on how these barriers apply to your facility by clicking the "Provide additional info" button next to any checkbox you have selected. This information is optional and will appear in Section 8.11.

- **Checkboxes for Categorizing Optional Free-Text Information in Sections 8.11 and 9.1**

Beginning in RY2014, you may indicate that you are submitting information pertaining to one or more specific topics by selecting from a pick-list of topics provided by TRI-MEweb in Section 8.11 and Section 9.1. Sections 8.11 and 9.1 will be displayed as a table of comments on different topics rather than as single textboxes.



## *Important Information for Reporting Year (RY) 2014*

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Use of the checkboxes will ensure that your optional information reaches its intended audience.

- **Labeling Changes**

The Form R for RY 2014 includes several labeling changes that are not associated with any changes to reporting requirements. These changes include the relabeling of Section 8, “Source Reduction and Waste Management;” the insertion of the heading, “Production-related waste managed” for Sections 8.1-8.7; the relabeling of Section 8.8 as “Non-production-related waste managed”; the placement of the heading “Disposal to land on-site” to encompass both Sections 5.4 and 5.5; and the use of the term “Activity Ratio” in Section 8.9 in place of “Activity Index.”

- **Pollution Prevention**

In order to promote pollution prevention (P2), EPA has increased the prominence and accessibility of the P2 information reported in Sections 8.10 and 8.11 of the Form R. Some companies reporting P2 are now highlighted in the annual [TRI National Analysis](#) report, and all P2 entries are featured in the [TRI P2 Search](#) tool.

P2 data is also newly accessible at the corporate level through this tool. To learn more, visit: <http://www2.epa.gov/toxics-release-inventory-tri-program/pollution-prevention-p2-and-tri>.

- **Distributing POTW Transfer Quantities in Section 8**

Table VI contains removal and destruction rates for toxic chemicals sent to POTWs, based on experimental and estimated data. These percentages are automatically pre-loaded into TRI-MEweb to assist with Section 8 calculations, but may be overridden if the facility has better information on the final disposition of the chemical readily available.

## **Other Important Information for Reporting Year 2014**

**EPA's Audit Policy.** If you discover your facility is or may have been in violation of Section 313 of EPCRA (TRI Reporting), please refer to EPA's Policy entitled, "Incentives for Self-Policing: Discovery, Disclosure, Correction, and Prevention of Violations" (Audit Policy), 65 FR 19618, April 11, 2000. You may qualify for having all gravity-based penalties waived if your facility meets all nine (9) conditions of the Audit Policy. For more information on EPA's Audit Policy, see the Agency's website: <http://www.epa.gov/compliance/incentives/auditing/auditpolicy.html>.

**EPA Enforcement Response Policy for TRI Revisions.** On September 26, 1991, EPA published a Federal Register notice on revisions to TRI reporting forms under EPCRA Section 313 (56 FR 48795-03). Section V of the notice refers to the Agency's enforcement and penalties policy regarding Form R errors:

Facilities are reminded that there is a legal obligation to file an accurate and complete Form R report for each chemical by July 1 each year. EPA may take enforcement action and assess civil administrative penalties regarding corrections to errors in Form R reports that are not changes based on previously unavailable information or procedures which improve the accuracy of the data initially reported. The kinds of errors which may result in enforcement and in penalties include but are not limited to the following: (1) Errors caused by not using the most readily available information, for example, not using monitoring data collected for compliance or other purposes with other regulations in calculating releases; (2) omitting a major source of emissions; (3) a mathematical or transcription or typographical error which seriously compromises the accuracy of the information, and; (4) other errors which seriously affect the utility of the data, particularly errors in release reporting for which the facility has no records showing the derivation of the release calculation, and cannot provide a sufficient explanation of the report.

**EPA's Small Business Compliance Policy.** If you have 100 or fewer employees and discover that your facility is or may have been in violation of Section 313 of EPCRA (TRI Reporting), please refer to EPA's Small Business Compliance Policy. EPA will eliminate or significantly reduce penalties for small businesses that meet the conditions of the Policy, including voluntarily discovering violations and

promptly disclosing and correcting them. This Policy implements Section 223 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) of 1996. For more information, see the Agency's website:

<http://www.epa.gov/compliance/incentives/smallbusiness/index.html>.

**Parent Company Information.** In past years, the Agency found that many facilities report inaccurate parent companies and/or Dun and Bradstreet numbers in Sections 4 and 5 of the TRI reporting forms. All facilities should verify the accuracy of facility and parent company information (e.g., D&B number, parent company name). Related questions and answers are provided in Appendix I.

Please note that EPA pre-loads standardized parent company names into TRI-MEweb that were researched from the prior year submissions. This step was taken to improve the accuracy of parent company names as well as create a standard format for the names themselves. For example, only capital letters are used and all periods are eliminated from the parent names. In addition, standardized abbreviations are now used for common terms found in parent names such as 'CO for Company' and 'INC for Incorporated.' More detailed explanations and a facility-by-facility list of standardized parent names can be found at <http://www2.epa.gov/toxics-release-inventory-tri-program/standardized-parent-company-names-ry-2014-tri-reporting>.

- A. To verify the accuracy of your facility and parent company Dun and Bradstreet number and name, as required in Section 5 of both Form R and Form A, go to: [https://www.dnb.com/product/dlw/form\\_cc4.htm](https://www.dnb.com/product/dlw/form_cc4.htm) or call 1-888-814-1435 to verify your information. Callers to the toll free phone number should understand that the Dun and Bradstreet support representatives will need to verify that callers requesting the D&B numbers are agents of the business. Dun and Bradstreet recommends knowing basic information such as when the business originated, officer names, and the name, address, and phone number for the facility.
- B. Facilities reporting to TRI should also make sure they are providing the parent company name and Dun and Bradstreet number as of December 31<sup>st</sup> of the current reporting year.

### **TRI-MEweb RY 2014 Version**

The TRI-MEweb application helps facilities fulfill their Emergency Planning and Community Right-to-Know (EPCRA) Section 313 and Pollution Prevention Act (PPA) Section 6607 obligations. TRI-MEweb is an interactive, intelligent, user-friendly web-based application tool that guides facilities through TRI reporting. Using a series of logically ordered questions, TRI-MEweb streamlines the analysis needed to determine if a user must complete a Form R Report or if they meet thresholds that allow them to use the Form A Certification Statement for a particular chemical.

The TRI-MEweb software provides guidance for each data element on the TRI reporting Forms. TRI-MEweb checks the entered data for common errors and then prepares it for electronic transmission and certification in the Agency's Central Data Exchange (CDX) (see the flow diagram of the TRI-MEweb reporting process (Figure 1) on page 2.)

**The Electronic Reporting Rule of 2014 expanded the use of the TRI-MEweb application to allow submission of RY 1991 –2014 data.** TRI-MEweb allows facilities to submit, revise, and withdraw TRI reporting forms for RYs 1991 – 2014, provided the forms do not contain trade secret information. Facilities may no longer submit, revise, or withdraw TRI reporting forms for reporting years prior to RY 1991.

**July 1 is the TRI reporting deadline.** There is a legal obligation to file an accurate and complete Form R report for each chemical by July 1 each year. EPA may take enforcement action and assess civil administrative penalties regarding corrections to errors in Form R reports that are not changes based on previously unavailable information or procedures which improve the accuracy of the data initially reported. The kinds of errors which may result in enforcement and in penalties include but are not limited to the following: (1) errors caused by not using the most readily available information, for example, not using monitoring data collected for compliance or other purposes with other regulations in calculating releases; (2) omitting a major source of emissions; (3) a mathematical or transcription or typographical error which seriously compromises the accuracy of the information, and; (4) other errors which seriously affect the utility of the data, particularly errors in release reporting for which the facility has no records showing the derivation of the

release calculation, and cannot provide a sufficient explanation of the report.

**Electronic Facility Data Profile (eFDP).** Reporting facilities may confirm and review the TRI data they submitted to EPA by viewing their electronic Facility Data Profile (eFDP) online by logging into their CDX account and clicking the *TRI-MEweb: TRI Made Easy* link from the *MyCDX* page. This opens the "Welcome" page of the TRI-MEweb application. On the "Welcome" page, follow the instructions for viewing the eFDP. If the facility Technical Contact provides an email address in the Form R/Form A Certification Statement, they will receive an email notifying them when their eFDP has been updated and published for review in TRI-MEweb.

### **TRI-MEweb User Resources**

- TRI-MEweb website:  
<http://www2.epa.gov/toxics-release-inventory-tri-program/tri-meweb-resources>.  
Service notifications and reference materials for reporting are posted on this webpage.
- TRI-MEweb online tutorials:  
<http://www2.epa.gov/toxics-release-inventory-tri-program/tri-meweb-tutorials>.  
Online Tutorials that provide step-by step instructions for using TRI-MEweb.

TRI Information Center Hotline [(800) 424-9346 - select option 3] and CDX Help Desk (888) 890-1995. These hotlines provide regulatory reporting assistance and CDX/TRI-MEweb technical support to TRI reporting facilities.

**Uncertified TRI-MEweb Submissions.** A facility's registered certifying official must electronically sign Form R and/or Form A reports via TRI-MEweb before the submission is complete. Uncertified TRI-MEweb electronic submissions are not considered complete according to the reporting requirements in EPCRA Section 313. Lack of certification will prevent the submission from being processed.

## **How to Begin Using the RY 2014 TRI-MEweb Reporting Tool**

**TRI-MEweb is accessed through EPA's Central Data Exchange (CDX).** The TRI-MEweb application uses EPA's CDX network to transmit and certify electronic submissions to EPA. CDX allows facilities to submit a paperless report and receive instant receipt confirmation of their submission via the Internet. In addition, facilities that reside in a state or tribe participating in the TRI Data Exchange (TDX) will have their RY 2005 - 2014 forms sent simultaneously to EPA and their state or tribal TRI representative in electronic format. Find which states are participating in TDX at: <http://www2.epa.gov/toxics-release-inventory-tri-program/tri-data-exchange>.

**Getting started.** In early 2015, all technical contacts, preparers, and certifying officials from reporting facilities that filed TRI reports in the prior reporting year will be emailed their 6-digit alpha numeric **access key** for each facility account in TRI-MEweb. This unique access key is used to load any TRI data received by EPA in the past seven reporting years into its corresponding TRI-MEweb facility account. If you have not received a unique 6-digit access key by February, call the CDX helpdesk at (888) 890-1995, however the access key is **ONLY** needed if you cannot access your facility account in TRI-MEweb or if a new user wants access to the TRI-MEweb facility account. In most cases, you will be able to start an RY 2014 submission without needing the annual email containing your access key. TRI-MEweb users may also use the access key that EPA sent to facility contacts in previous years, however, in some exceptional cases, the key may have been changed by EPA's Data Processing Center.

**Log in to your CDX user account to open the TRI-MEweb application.** Preparers and certifying officials must have a CDX user account. During the CDX registration process, both user roles will need to add the TRI-MEweb application to their CDX user account before preparing/certifying their TRI forms. Web browsers must have a security setting of TLS 1.0 enabled. Otherwise, the CDX login web page will appear as if it is broken. For detailed instructions for changing the security settings on your Web browser, go to the TRI-MEweb Resource Web page:

<http://www2.epa.gov/toxics-release-inventory-tri-program/tri-meweb-resources>.

- If you cannot reset the password to your CDX account or have forgotten your CDX login name, please call the CDX Hotline (888) 890-1995.
- For assistance setting up a new CDX user account, adding your TRI role, adding the TRI-MEweb application to your CDX user profile, or for information on using the TRI-MEweb reporting tool, visit the [TRI-MEweb Resources](#) page.
- The CDX login can be accessed at: <https://cdx.epa.gov/>.
- **TRI-MEweb can import previous year data into current year chemical forms.** TRI-MEweb can import prior year data (if RY 2013 data were provided by the facility in the previous year) into each selected current year TRI chemical form. Although it is optional, importing data can accelerate data entry if the same chemicals are reported to EPA each year. Importing data into any forms that have been already started in TRI-MEweb will result in the data being overwritten by the imported data fields.

**Two user roles involved in TRI reporting.** There are two user roles in the TRI reporting process: a preparer role and a certifying official role. Figure 1 (page 2) illustrates how these two roles are involved in the TRI reporting process. The "Preparer" is the person who prepares TRI forms for submission in TRI-MEweb but is not authorized to certify them. The "Certifying Official" is the person of authority or legal representative at a facility that will be certifying the data contained in the submitted TRI Form R or Form A Certification Statement in TRI-MEweb to EPA and their state or tribe. Certifying officials may also prepare forms, but the preparer cannot certify TRI forms that have been transmitted to CDX. Both TRI roles require a CDX user account with the TRI-MEweb application added to the *MyCDX* profile. Step-by-step instructions for creating CDX user accounts for new preparers or certifying officials can be found on the [TRI-MEweb Resources](#) web page.

All newly designated certifying officials with CDX accounts are required to submit an Electronic Signature Agreement (ESA) form to EPA for approval before certifying TRI forms submitted to EPA and their appropriate state or tribe. (See Section A.2 for details on ESA processing.)

## *Important Information for Reporting Year (RY) 2014*

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**Easier certification process built into TRI-MEweb.** TRI-MEweb has a certification process that allows the certifying official to certify any reporting year TRI Form R or Form A Certification Statement directly within TRI-MEweb. In past years, certifying officials had to exit TRI-MEweb to certify forms. However, certifying officials no longer need to log out of the system to certify the forms prepared in the TRI-MEweb application. The certifying official simply logs in to their CDX account, opens TRI-MEweb, and certifies TRI forms with certifications pending.

**Requirements for new certifying officials.** New certifying officials must complete the following tasks before any pending TRI submission can be certified. If a certifying official completed this process in RY 2013, they will bypass the new certifying official setup process.

- 1. Security requirements.** A returning certifying official responsible for an Electronic Signature Agreement approved prior to RY 2013 or a new certifying official in RY 2014 must comply with new security standards by choosing and answering 5 questions from a list of 20. One of the answered questions will be used to verify and authenticate the identity of the certifying official as part of the electronic signature process. You are also required to provide the TRI Facility Identification (TRIFID) of your reporting facility and electronically sign a TRIFID Certification Agreement to obtain access to any pending submissions. The new certification module in TRI-MEweb captures and stores information for all certifying officials. Please record the answers to your security questions because you will not be able to edit them in TRI-MEweb or within your CDX user account. If you forget to answer your security question after three attempts, your account will be locked and you will need to call the CDX helpdesk to reset the answers to your security questions.
- 2. “Real-time” Electronic Signature Agreement (ESA) approval option for new certifying**

**officials.** Since RY 2012, EPA provides an alternative method for certifying officials to process ESAs in real-time using a third-party identity verification vendor named LexisNexis. In the past, all new ESA applications were required to be mailed in for approval, a process that took about two weeks. Now all new certifying officials will be prompted to consider using LexisNexis to obtain their ESA approval upon registering for a new CDX account at <https://cdx.epa.gov>. ESAs approved using LexisNexis will receive electronic notification in seconds, or “real time”.

Another significant advantage of the real-time method, besides obtaining immediate ESA approval, is that the real-time approval is applicable to multiple CDX system flows. Programs like eTSCA and Risk Management Plan (RMP eSubmit) will be able to share the security credentials offered by the CDX ESA obtained under TRI. To obtain this real-time approval, the certifying official must provide personal identity authentication information such as name, address, etc. Please note that EPA does not collect any personal information from our users. The use of these third party verification and identification widgets is common in banking systems.

However, for those new certifying officials that do not wish to provide personal information to a third-party vendor, or who fail the real-time method for some reason, the traditional paper ESA form will still be available. **The hard copy ESA approval process requires the printing, completion, and mailing of an electronic signature agreement form (see page 3 for where to send form). Please allow adequate time for the mailing and processing of this form, which is estimated to take a minimum of five (5) business days.** Facilities that do not have a signed ESA, electronic or hard copy, will not be able to certify forms in TRI-MEweb. It is recommended that certifying officials complete their ESA well in advance of the reporting deadline.

## **A. General Information**

Reporting to the Toxic Chemical Release Inventory (i.e., Toxics Release Inventory (TRI)) is required by Section 313 of the Emergency Planning and Community Right to Know Act (EPCRA, or Title III of the Superfund Amendments and Reauthorization Act of 1986), Public Law 99 499. The information contained in the Form R constitutes a “report,” and the submission of a report to the appropriate authorities constitutes “reporting.”

The Pollution Prevention Act, of October, 1990 (Pub. L. 101 508), added reporting requirements to the Form R. These requirements began with calendar year 1991 reports and affect all facilities required to submit a Form R under Section 313 of EPCRA.

Reporting is required to provide information to the public on releases and other waste management of EPCRA Section 313 chemicals in their communities and to provide EPA with release and other waste management information to assist the Agency in determining the need for future regulations. Facilities must report the quantities of routine and accidental releases, and releases resulting from catastrophic or other onetime events of EPCRA Section 313 chemicals, as well as the maximum amount of the EPCRA Section 313 chemical on-site during the calendar year and the amount contained in wastes managed on-site or transferred off-site.

A completed Form R or Form A must be submitted for each EPCRA Section 313 chemical manufactured, processed, or otherwise used at each covered facility as described in the reporting rules in 40 Code of Federal Regulations (CFR) Part 372 (originally published February 16, 1988, in the *Federal Register* and November 30, 1994, in the *Federal Register* (for Form A)).

The Electronic Reporting Rule was published in the [Federal Register on August 27, 2013 \(78 FR 52860\)](#) and requires all forms to be submitted electronically. Reports that are not submitted electronically using TRI-MEweb will not be processed as acceptable

submissions. However, facilities submitting TRI reports containing trade secrets will still submit their reports to EPA on paper, not via TRI-MEweb. This electronic reporting requirement includes late submissions for prior reporting years, revisions, and withdrawals.

### **A.1 Who Must Report**

EPCRA Section 313 requires that reports be filed by owners and operators of facilities that meet all of the following criteria:

- The facility has 10 or more full-time employee equivalents (i.e., a total of 20,000 hours or greater; see 40 CFR 372.3);
- The facility is included in a North American Industry Classification System (NAICS) code listed in Table I. NAICS codes found in Table I correspond to the following Standard Industrial Classification (SIC) Codes: SIC 10 (except 1011, 1081, and 1094), 12 (except 1241), 20-39, 4911 (limited to facilities that combust coal and/or oil for the purpose of generating electricity for distribution in commerce), 4931 (limited to facilities that combust coal and/or oil for the purpose of generating electricity for distribution in commerce), 4939 (limited to facilities that combust coal and/or oil for the purpose of generating electricity for distribution in commerce), 4953 (limited to facilities regulated under RCRA Subtitle C, 42 U.S.C. Section 6921 *et seq.*), 5169, 5171, and 7389 (limited to facilities primarily engaged in solvents recovery services on a contract or fee basis); and
- The facility manufactures (defined to include importing), processes, or otherwise uses any EPCRA Section 313 chemical in quantities greater than the established threshold in the course of a calendar year. Reporting thresholds are listed in Section B.4.

Executive Order 13423 extends these reporting requirements to federal facilities, regardless of their SIC or NAICS code.

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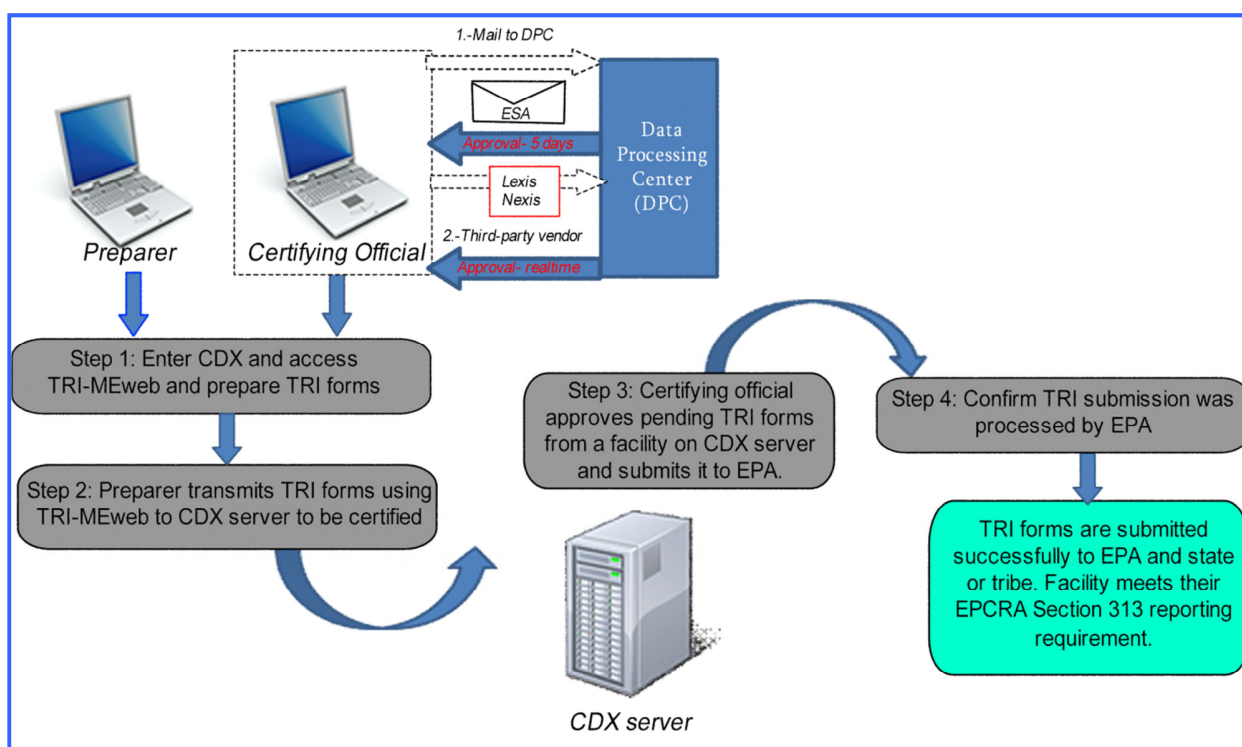


Figure 1. TRI-MEweb's Preparation, Transmission, Certification and Submission Steps

### A.2 How to Submit Forms

Facilities must use the TRI-MEweb application to submit non-trade secret TRI reports. TRI-MEweb is accessible online and assists facilities reporting TRI data by importing prior year TRI form data into current year forms to expedite reporting, validating reports to ensure higher data quality, and providing instant receipt confirmation of submissions.

Some facilities prepare TRI reporting forms using their own software. These facilities still need to load and submit their TRI reporting forms to EPA using TRI-MEweb via the online reporting application's third-party load feature. More information on the third-party load feature can be found on the TRI-MEweb webpage: <http://www2.epa.gov/toxics-release-inventory-tri-program/tri-meweb-resources>.

Facilities must submit a copy of each reporting form sent to EPA to the state or tribe in which that facility is located. Conveniently, TRI-MEweb will simultaneously send a copy of each reporting form submitted to EPA to the appropriate state or tribal official if the state or tribe participates in the TRI Data Exchange (TDX). (Internet submissions are currently not available for trade secret claims). This simultaneous submission satisfies a facility's legal

obligation to report to EPA and the appropriate state or tribe. States participating in TDX are shown on this website.

<http://www2.epa.gov/toxics-release-inventory-tri-program/tri-data-exchange>.

Please be aware that if your facility does not reside in a state or tribe participating in the TDX, just transmitting TRI forms via the Internet does not satisfy your state or tribal reporting requirements for your facility. You must report to your state or tribe separately and in the required format specified by your state or tribe. However, if your state or tribe is not in the TDX then TRI-MEweb can still be used by the reporting facility to prepare and print the proper paper TRI forms. A senior management official must certify the submission by signing the TRI forms. For non-TDX states and tribes, completed TRI forms must be printed from TRI-MEweb and mailed to the designated state or tribal contact. Do not send forms from the TRI-MEweb application to EPA's Data Processing Center (DPC), except for trade secret submissions, which still must be sent to the DPC.

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### Electronic Signature Agreement

An Electronic Signature Agreement (ESA) is a statement that declares that the person electronically signing a document (i.e., a reporting form) understands the electronic signature is as legally binding as a handwritten signature. EPA requires a certifying official to have a signed ESA on record before the certifying official can certify and submit a TRI form created in TRI-MEweb. Returning certifying officials since RY 2013 will likely have an ESA signed on record and will only need to navigate to the “**Certify**” tab in TRI-MEweb to find any pending submission(s) that is ready to be certified.

ESAs are created when the certifying official creates a new CDX user account with a certifying official role within CDX. Currently, there are two ways to obtain an ESA approval from EPA.

#### Option 1 - LexisNexis real-time ESA approval.

A new certifying official may use a third-party identity verification vendor to obtain an ESA electronically. The certifying official will need to voluntarily provide personal identifying information to the third-party vendor (EPA does not collect any personal information from our users) to authenticate his or her identity. The most significant benefit gained from using this third-party identify verification is that users will no longer need to wait up to 5 business days for EPA to approve an ESA. If the certifying official does not wish to provide personal information to a third-party vendor, he or she should submit a paper ESA form instead well ahead of the July 1 reporting deadline.



**Option 2 - Paper ESA form.** A printable ESA form can be generated during the CDX registration process. The ESA form must be signed and mailed to EPA’s Data Processing Center (DPC in figure 1) for approval before the certifying official can begin to certify any TRI forms transmitted by the preparer to CDX using TRI-MEweb. Hard copy ESA approval may take up to five business days, so please plan accordingly or consider option one, LexisNexis. Multiple TRIFIDs can also be added to a single hard copy ESA form. All newly assigned TRIFIDs will be listed in the printout of the ESA document. TRI-MEweb is updated when the ESA is approved.

Paper ESAs can be mailed to the address below:  
Attention: TRI ESA Approval Request  
TRI Reporting Center  
P.O. Box 10163  
Fairfax, VA 22038

**TRIFID Certification Agreement.** In addition to the ESA, new certifying officials must sign a TRIFID Certification Agreement for each facility they represent. By signing the TRIFID Certification Agreement, certifying officials are confirming that they are owner/operators or senior management officials for the reporting facility and are authorized to certify forms for that facility. Certifying officials must complete the TRIFID Certification Agreement only once for each facility they represent as a certifying official. Returning certifying officials will be ready to certify any forms for a facility account that has a signed TRIFID Signature Agreement. A single CDX ESA will also allow new and returning certifying officials to represent additional facility accounts without the need for an ESA approval for each facility account. All newly added facility accounts will only require a TRIFID Signature Agreement to be signed.



To sign the TRIFID Certification Agreement form, users must be logged into TRI-MEweb using an account with a certifying official role and users must have submitted and obtained approval via CDX or a paper ESA. Click on the “**Certify**” tab to access the "Manage TRIFIDs for Certification" page, where a list of TRIFIDs pending signature is displayed. Then select the check box next to the facility’s TRIFID in the "Pending Signature" table and click **Sign Agreement** button. Review the TRIFID Certification Agreement and click **I Agree** button. The electronic signature widget will prompt the certifying official to enter their CDX password, answer a secret question, and click **Sign**. A confirmation box will appear, noting the successful signature.

**ESA and TRIFID Certification Agreement Status in TRI-MEweb.** The ESA and TRIFID Certification Agreement status of the certifying official(s) assigned to each facility is listed under the ESA Status column in TRI-MEweb.

- A status of  **No CDX ESA** indicates that no certifying officials are associated with the facility.
- A status of  **Sign CDX ESA** indicates that either:



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- The certifying official has not signed an ESA. The certifying official must sign a new CDX ESA.
- The certifying official has provided a paper copy of ESA prior to RY 2012. The returning certifying official must electronically sign a new CDX ESA upon logging in to CDX for first time in RY 2014. Also note that TRIFID Certification Agreement has also not been signed.
- A status of  **Sign TRIFID Signature Agreement** indicates that the certifying official has obtain approval of the CDX ESA, but still needs to sign the TRIFID Certification Agreement within the TRI-MEweb application.
- A status of  **Active Certifying Official Available** indicates that your assigned certifying official has received approval of the ESA, signed the TRIFID Certification Agreement, and is ready to certify any pending forms transmitted by the preparer.

**Accidental deletion of ESA in TRI-MEweb.** The TRI-MEweb application also has the capability to manage user profiles (previously authorized preparers or certifying officials) that have been granted access to facility accounts. This capability includes revoking approved ESA(s) for any certifying official(s) that has left the facility's payroll or is no longer authorized to certify forms. An ESA could also be accidentally revoked by the preparer. If this occurs, there is a 45-day grace period to get the ESA reactivated by the CDX helpdesk without having to send a paper form to EPA for re-approval. An email notification is sent to the affected certifying official by CDX when an ESA has been revoked within TRI-MEweb.

### State and Tribal Submissions.

If the facility is in a state that is not in EPA's TRI Data Exchange (TDX) system, then the facility must also send a copy of the report to the state. To verify if your state is or is not in the TDX system, go to: <http://www2.epa.gov/toxics-release-inventory-tri-program/tri-data-exchange>. "State" also includes: the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, Marshall Islands, the U.S. Virgin Islands, the Commonwealth of the Northern Mariana Islands, and any other jurisdiction and Indian country. Refer to Appendix E for the appropriate state submission addresses.

Facilities located within a tribe's Indian country will need to provide their three-digit Bureau of Indian Affairs (BIA) tribal code for their Indian country name in the "City/County/Tribe/State/ZIP code" field on the Form R or Form A in Section 4.1. In TRI-MEweb, these facilities should select the "My facility is located in Indian Country" checkbox and "Add BIA Code," which provides a searchable list of BIA codes and corresponding Indian country names. BIA tribal codes are also provided in Table V.

Hard copies of TRI forms must be mailed to the tribe's Chief Executive Officer because most tribal entities are not members of TDX. If tribes have entered into a cooperative agreement with states, report submissions should be sent to the entity designated in the cooperative agreement. Facilities using TRI-MEweb to fulfill their federal and tribal reporting requirements under EPCRA Section 313 will be able to print a hard copy of the TRI form to mail to their Indian country's Chief Executive Officer.

**RYs 1991 - 2004 submissions:** If a facility prepares and submits a TRI RY 1991 through RY 2004 form using TRI-MEweb, they must print/save a copy of their TRI form on a disk and send it to their State or Tribal TRI coordinator, even if State or Tribal Country is on the TRI Data Exchange (TDX) network. TDX is not configured to simultaneously transmit pre-RY 2005 TRI forms.

### A.3 Trade Secret Claims

Starting with RY 2013, the only TRI reports EPA will accept on paper are for trade secret submissions. Paper submissions must be sent to both EPA and the state or the designated official of an Indian tribe and follow the requirements for reporting trade secrets. If a report is not received by both EPA and the state (or the designated official of an Indian tribe), the submitter is considered out of compliance and subject to enforcement action. Facilities submitting paper forms must use the corresponding reporting year forms. To facilitate the completion and processing of paper forms, EPA is providing electronically fillable reporting forms that can be completed prior to printing for RY 2014 TRI forms. The fillable reporting form can be found on the TRI website: <http://www2.epa.gov/toxics-release-inventory-tri-program/tri-reporting-forms-and-instructions>.

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E-mailed submissions will not be accepted.

For any EPCRA Section 313 chemical whose identity is claimed as trade secret, two versions of the substantiation form must be submitted to EPA as prescribed in 40 CFR Part 350, published July 29, 1988, in the *Federal Register* (53 FR 28772) as well as two versions of the EPCRA Section 313 report. The current substantiation form is available on the TRI website at: [http://www2.epa.gov/toxics-release-inventory-tri-program/tri-reporting-forms-and-instructions#Anchor\\_5](http://www2.epa.gov/toxics-release-inventory-tri-program/tri-reporting-forms-and-instructions#Anchor_5). One set of reports, the unsanitized version, must provide the actual identity of the EPCRA Section 313 chemical. The other set of reports, i.e., the “sanitized” version, must provide a generic class or category for the chemical that is structurally descriptive of the EPCRA Section 313 chemical. If EPA deems the trade secret substantiation form valid, only the sanitized set of forms will be made available to the public.

Further explanation of the trade secret provisions is provided in Part I, Sections 2.1 and 2.2, and Part II, Section 1.3, of the instructions.

In summary, a complete report to EPA for an EPCRA Section 313 chemical claimed as a trade secret must include all of the following:

- A completed unsanitized version of Form R or Form A report including the EPCRA Section 313 chemical identity (staple the pages together); and
- A sanitized version of a completed Form R or Form A report in which the EPCRA Section 313 chemical identity items (Part II, Sections 1.1 and 1.2) have been left blank but in which a generic chemical name that is structurally descriptive has been supplied (Part II, Section 1.3) (staple the pages together); and
- A completed unsanitized version of a trade secret substantiation form (staple the pages together); and
- A sanitized version of a completed trade secret substantiation form (staple the pages together).

Securely fasten all four reports together.

Some states or tribes also require submission of both sanitized and unsanitized reports for EPCRA Section 313 chemicals whose identity is claimed as a trade secret. Others require only a sanitized version. Facilities may jeopardize the trade secret

status of an EPCRA Section 313 chemical by submitting an unsanitized version of the EPCRA Section 313 report to a state agency or Indian tribe that does not require unsanitized forms. You may identify an individual state or tribe’s submission requirements by contacting the appropriate state or tribe designated EPCRA Section 313 contact (see Appendix E).

### Where to send your trade secret submission

Please send only trade secret submissions to the P.O. Box below. Send trade secret submissions by *regular mail* to:

Attention: EPCRA Substantiation Packages  
TRI Reporting Center  
P.O. Box 10163  
Fairfax, VA 22038

Send trade secret submissions by *certified mail or overnight mail* (i.e. Fed Ex, UPS, etc.) to:

Attention: EPCRA Substantiation Packages  
CGI Federal, Inc.  
c/o EPA Reporting Center  
12601 Fair Lakes Circle  
Fairfax, VA 22033

### A.4 Recordkeeping

Sound recordkeeping practices are essential for accurate and efficient TRI reporting. It is in the facility’s interest, as well as EPA’s, to maintain records properly. Facilities must keep a copy of each report filed for at least three years from the date of submission. These reports will be of use when completing future reports.

Facilities must also maintain those documents, calculations, worksheets, and other forms upon which they relied to gather information for prior reports. In the event of a problem with data elements on a facility’s Form R or Form A report, EPA may request documentation from the facility that supports the information reported.

EPA may conduct data quality reviews of Form R or Form A submissions. An essential component of this process involves reviewing a facility’s records for accuracy and completeness. EPA recommends that facilities keep a record for those EPCRA Section 313 chemicals for which they did not file EPCRA Section 313 reports.

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EPA also recommends keeping records of all documentation containing your CDX account information for your preparer(s) and certifying official(s) that use TRI-MEweb to prepare and certify the reporting facility's TRI Form R and/or Form A. These CDX documents include the Electronic Signature Agreement (ESA) and the facility's unique 6-digit alphanumeric access key.

Records to maintain include:

- Previous years' EPCRA Section 313 reports;
- EPCRA Section 313 Reporting Threshold Worksheets;
- Engineering calculations and other notes;
- Purchase records from suppliers;
- Inventory data;
- EPA (NPDES) permits and monitoring reports;
- EPCRA Section 312 Tier II Reports;
- Monitoring records;
- Flowmeter data;
- RCRA Hazardous Waste Generator's Report;
- Pretreatment reports filed by the facility with the local government;
- Invoices from waste management companies;
- Manufacturer's estimates of treatment efficiencies;
- RCRA manifests;
- Process diagrams that indicate emissions and other releases;
- Records for those EPCRA Section 313 chemicals for which they did not file EPCRA Section 313 reports; and
- CDX account information including unique 6-digit access key to pre-load facility account into TRI-MEweb and copies of the Electronic Signature Agreement (s) submitted to EPA for approval.

### ***A.5 How to Revise, Withdraw or Cancel TRI Data***

#### **A.5.1 Revising TRI Data**

Facilities that filed a Form R and/or Form A Certification Statement under EPCRA Section 313 may submit a request to revise a form that was previously submitted, stored in EPA's historical

database called the Toxics Release Inventory Processing System (TRIPS), and made available to the public through Envirofacts and TRI Explorer.

Effective January 21, 2014 facilities may only revise TRI reporting forms submitted for RY 1991 through the current reporting year and must do so using TRI-MEweb (except for reporting forms containing trade secrets).

Facilities may request a revision for one or more of the following reasons:

Revision codes:

- RR1 - New Monitoring Data
- RR2 - New Emission Factor(s)
- RR3 - New Chemical Concentration Data
- RR4 - Recalculation(s)
- RR5 - Other Reason(s)

Please note that late submissions for chemicals not reported in a previous reporting year are not considered revisions for that year.

Facilities are reminded that there is a legal obligation to file an accurate and complete Form R or Form A report for each chemical by July 1 each year. EPA may take enforcement action and assess civil administrative penalties regarding corrections to errors in Form R reports that are not changes based on previously unavailable information or procedures which improve the accuracy of the data initially reported. The kinds of errors which may result in enforcement and in penalties include but are not limited to the following: (1) Errors caused by not using the most readily available information, for example, not using monitoring data collected for compliance with other regulations in calculating releases; (2) omitting a major source of emissions; (3) a mathematical or transcription or typographical error which seriously compromises the accuracy of the information, and; (4) other errors which seriously affect the utility of the data, particularly errors in release reporting for which the facility has no records showing the derivation of the release calculation, and cannot provide a sufficient explanation of the report.

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### How do I revise my submission(s)?

If you plan to revise a TRI submission, send revised report(s) to EPA and the appropriate state or tribal agency.

Use TRI-MEweb to submit revisions to non-trade secret TRI submissions. EPA will only accept revisions for RY 1991 through the current year.

If you have questions about using TRI-MEweb to revise your Form R/A, please refer to the TRI-MEweb tutorial page at:

<http://www2.epa.gov/toxics-release-inventory-tri-program/tri-meweb-tutorials>.

### A.5.2 Withdrawing TRI Data

Facilities that filed a Form R and/or Form A Certification Statement under EPCRA Section 313 may submit a request to withdraw a form that was previously submitted, stored in the Toxics Release Inventory Processing System (TRIPS), and made available to the public through Envirofacts and TRI Explorer. EPA may periodically review withdrawals.

Effective January 21, 2014 facilities may only withdraw TRI reporting forms submitted for RY 1991 through the current reporting year and must use TRI-MEweb to do so (except for reporting forms containing trade secrets).

Facilities may request a withdrawal for one or several reasons, such as:

Withdrawal codes:

- WT1 - Did not meet the reporting threshold for manufacturing, processing, or otherwise use
- WT2 - Did not meet the reporting threshold for number of employees
- WT3 - Not in a covered NAICS Code
- WO1 - Other reason(s)

### How do I withdraw my submission(s)?

If you plan to withdraw a TRI submission, send your request to EPA using TRI-MEweb – withdrawals on paper forms will not be accepted. Withdrawal requests for RY 2005 - 2014 forms will be automatically submitted to states participating in

the TRI Data Exchange (TDX). Non-TDX state/tribal facilities need to mail in hard copy forms to their state or tribe. Keep in mind that successfully completed withdrawal requests permanently delete the chemical release data that was provided by the reporting facility and processed into TRI's publicly available database.

If the reporting facility needs to make a correction to data submitted to EPA, a revision is easier to process than withdrawing incorrect TRI forms and resubmitting them to EPA.

Use TRI-MEweb to withdraw TRI forms from RY 1991 through the current year (except for reporting forms containing trade secrets). Withdrawals can only be done for TRI submissions that have been properly transmitted, certified and processed by EPA. If you have questions about using TRI-MEweb to withdraw your Form R/A, please refer to the TRI-MEweb *tutorial* page at:

<http://www2.epa.gov/toxics-release-inventory-tri-program/tri-meweb-tutorials>.

### A.5.3 Canceling a TRI Submission

Different situations may require a TRI-MEweb user to cancel an electronic TRI submission. For instance, a facility's preparer or certifying official may determine that a draft electronic submission(s) requires cancellation because the facility's chemical release did not, in fact, meet the reporting thresholds of EPCRA Section 313.

Another reason why a TRI-MEweb submission may require cancellation is if a preparer or certifying official has determined that a correction is needed on a TRI form that is pending certification in CDX, but has not yet been certified. In order to edit a TRI form in TRI-MEweb that is pending certification to CDX, the preparer will need to cancel the transmitted submission with a *Pending Certification* status in order to make the additional corrections in TRI-MEweb and retransmit the original submission or revision to CDX to be certified. EPA is considering issuing a Notice of Non-compliance for TRI Forms that have been transmitted to CDX but are not certified.

A preparer or a certifying official cannot cancel a TRI form submission that has already been transmitted and certified by the certifying official. If a chemical form has a status of *Certified and Sent to EPA* in TRI-MEweb it cannot be called back to be

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edited or corrected. To change or remove data that has already been transmitted, certified and submitted to EPA to be processed, either revise or withdraw the submission.

Note: ALL chemical forms that were included in the selected submission will be canceled.

### **How to Cancel a TRI Submission that has not been Certified.**

If your facility decides not to complete the certification process for any pending electronic submission(s) transmitted to CDX by TRI-MEweb, you should **CANCEL** the submission(s) using one of the following methods:

**By the Preparer:** The preparer may use the TRI-MEweb application to cancel any unwanted pending submission(s). In TRI-MEweb, the preparer must click the “**Prepare**” tab, choose the Reporting Year corresponding to the unwanted submission(s) from the “**Select Year**” tab, choose the appropriate facility from the “**Select Facility**” tab, and select the chemical form to be cancelled from the **Select a Form** page. Next, the preparer must click the “**Review**” tab. Then, the preparer must locate the submission that includes the chemical form they wish to cancel and select its radio button from the *Pending Submission Summary Table* on the **Reporting Summary** page. Next, they must click the “**Cancel**” button and confirm the cancellation on the next page. Note: ALL chemical forms that were included in the selected submission will be canceled.

**By the Certifying Official:** The certifying official may also cancel any unwanted TRI submission(s) pending certification. The certifying official must log into their CDX account and click the “**TRI-MEweb: TRI Made Easy – Prepare/Certify Submission**” link from their *MyCDX* page. This will open the “**Welcome**” page of the TRI-MEweb application and then select the “**Certify**” tab. If certifying official does not find the TRIFID for their reporting facility with pending submissions listed, they gain access to that facility account by entering the access key on the “Enter Facility’s Access Information” page and signing the TRIFID Certification Agreement on the “Manage TRIFIDs for Certification” page and clicking the “**Next**” button. The electronic signature widget will pop-up to confirm your authorized access to the facility account. Upon successful authentication of user identity, you may begin the cancellation process on

the “**Pending Submissions**” page under the “**Certify**” tab. You may view the content of the submission by clicking the “*View Submission*” icon to confirm that this is the correct submission to be cancelled. Select the “**Cancel**” radio button to cancel submission and select “**Next**” to confirm request. If you have questions about using TRI-MEweb to cancel your Form R or Form A Certification Statement submission, please refer to the TRI-MEweb tutorial page at:

<http://www2.epa.gov/toxics-release-inventory-tri-program/tri-meweb-tutorials>.

Please note that if you are not able to certify prior to the July 1 deadline, you will not be able to submit on paper instead. Please ensure you execute an electronic signature agreement (ESA) well ahead of the July 1 deadline. If your certifying official could not certify prior to the July 1 deadline because he or she had not established an approved Electronic Signature Agreement (ESA), he or she should log into CDX once it becomes approved by EPA and certify any pending submission(s).

### **If a facility could not process their ESA on time, should their certifying official still certify electronically after the July 1 deadline?**

Yes. If a certifying official cannot certify prior to the July 1 deadline because they have not established an approved ESA, they should log into CDX once it becomes approved by EPA and certify any pending submission(s).

### **A.6 When the TRI Report Must Be Submitted**

As specified in EPCRA Section 313, the report for any calendar year must be submitted on or before midnight on July 1 of the following year whether using Form R or Form A. If the reporting deadline falls on a Saturday or Sunday, EPA will accept forms submitted on the following Monday (i.e., the next business day).

Any voluntary revision to a report can be submitted anytime during the calendar year for the current or any previous reporting year. However, voluntary revisions for the current reporting year should be submitted by July 31 in order to be included in that year’s TRI National Analysis.

### ***A.7 How to Obtain the TRI Reporting Forms***

The TRI Form R, Form R Schedule 1, Form A Certification Statement, and related guidance documents may be obtained from EPA's TRI website at: <http://www2.epa.gov/toxics-release-inventory-tri-program>. *However, non-trade-secret TRI reporting forms must be submitted to EPA using TRI-MEweb.* Paper forms are no longer processed by EPA. Please do not send any paper forms, except for trade secret submissions, to EPA's Data Processing Center.

## **B. How to Determine if Your Facility Must Submit a Form R or Is Eligible to Use Form A**

This section will help you determine whether you must submit an EPCRA Section 313 report (EPA Form R or Form A Certification Statement). This section discusses EPCRA Section 313 reporting requirements such as the number of full-time employees, primary NAICS code, and chemical activity threshold quantities. The EPCRA Section 313 chemicals and chemical categories subject to reporting are listed in Table II (also see 40 CFR 372.65). (See Figure 2 for more information.)

### ***B.1 Full-Time Employee Determination***

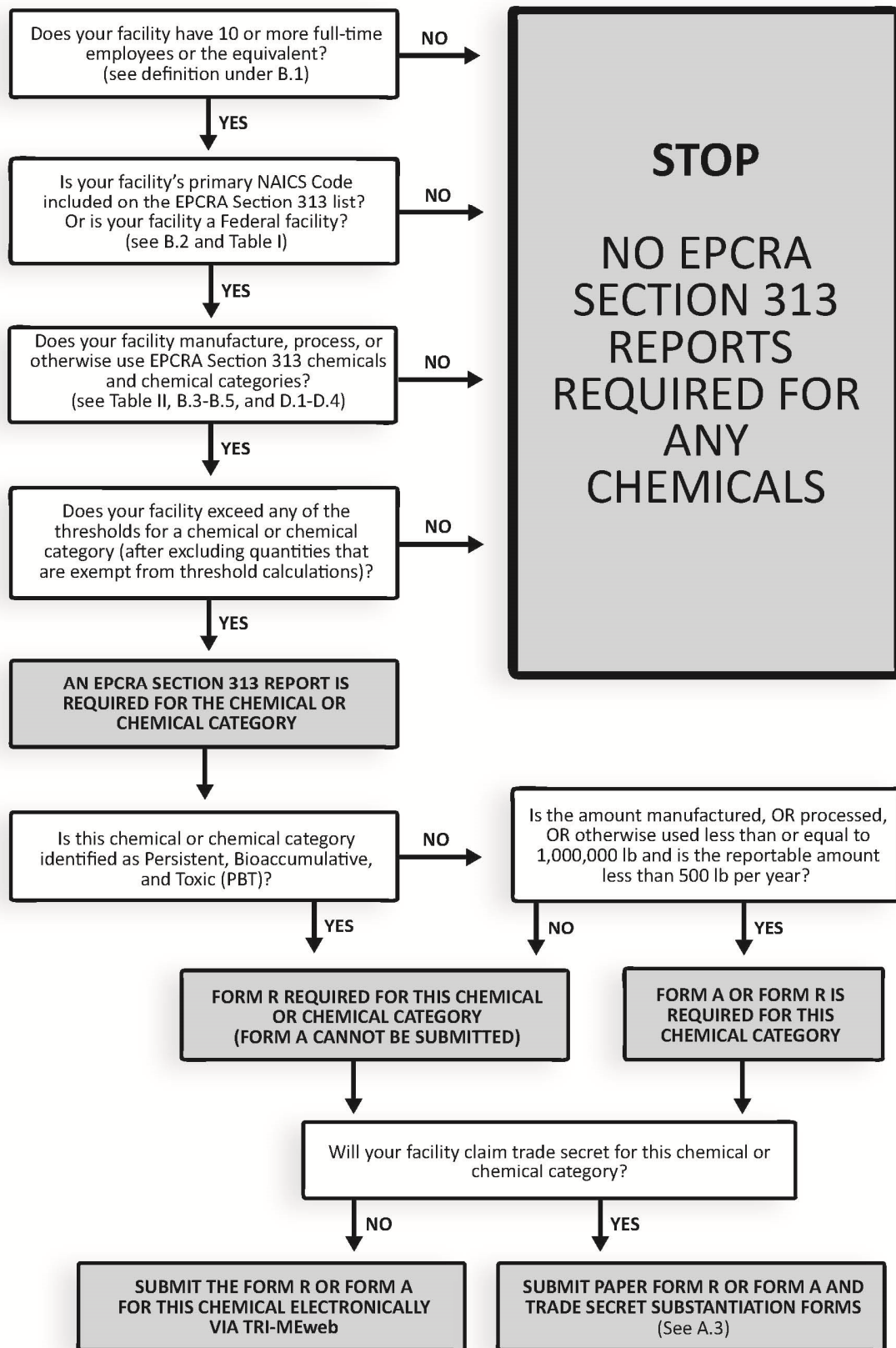
The number of full-time employees is dependent only upon the total number of hours worked by all employees and other individuals (e.g., contractors) for the facility during the calendar year and not the number of persons working. Therefore, a full-time employee, for purposes of EPCRA Section 313 reporting, is defined as 2,000 work hours per year. When making the full-time employee determination, the facility must consider all paid vacation and sick leave used as hours worked by each employee. In addition, EPA interprets the hours worked by an employee to include paid holidays. To determine the number of full-time employees working for your facility, add up the hours worked by all employees during the calendar year, including contract employees and sales and support staff working for the facility, and divide the total by 2,000 hours. The result is the number of full-time employees. In other words, if the total number of hours worked by all employees for your facility is 20,000 hours or more, your facility meets the ten employee threshold.

#### **Examples:**

- A facility consists of 11 employees who each worked 1,500 hours for the facility in a calendar year. Consequently, the total number of hours worked by all employees for the facility during the calendar year is 16,500 hours. The number of full-time employees for this facility is equal to 16,500 hours divided by 2,000 hours per full-time employee, or 8.3 full-time employees. Therefore, even though 11 persons worked for this facility during the calendar year, the number of hours worked is equivalent to 8.3 full-time employees. This facility does not meet the employee criteria and is not subject to EPCRA Section 313 reporting.
- Another facility consists of six workers and three sales staff. The six workers each worked 2,000 hours for the facility during the calendar year. The sales staff also each worked 2,000 hours during the calendar year although they may have been on the road half of the year. In addition, five contract employees were hired for a period during which each worked 400 hours for the facility. The total number of hours is equal to the time worked by the workers (12,000 hours), plus the time worked by the sales staff for the facility (6,000 hours), plus the time worked by the contract employees (2,000 hours), or 20,000 hours. Dividing the 20,000 hours by 2,000 yields 10 full-time employees. This facility has met the full-time employee criteria and may be subject to reporting if the other criteria are met.

The NAICS 2012 Manual is available from the National Technical Information Service (NTIS) website at: <http://www.ntis.gov/about/index.aspx>.

**How to Determine if Your Facility Must Submit a Form R or Is Eligible to Use Form A**



**Figure 2. EPCRA Section 313 Reporting Decision Diagram**



## **B.2 Primary NAICS Code Determination**

Beginning with 2006 EPCRA Section 313 reporting, the TRI Program requires North American Industry Classification System (NAICS) codes instead of Standard Industrial Classification (SIC) codes. Please refer to the TRI Program's final rule titled Community Right-to-Know; Toxic Chemical Release Reporting Using North American Industry Classification System (NAICS) published in the *Federal Register* on June 6, 2006 (71 FR 32464).

A direct final rule was published in the *Federal Register* on July 18, 2013 (78 FR 42875) to adopt 2012 NAICS codes for RY 2013 and subsequent reporting years.

The full list of 2012 NAICS codes for facilities that must report to TRI (including exceptions and/or limitations) if all other threshold determinations are met can be found in Table I and also at the TRI website at: <http://www2.epa.gov/toxics-release-inventory-tri-program/my-facilitys-six-digit-naics-code-tri-covered-industry>.

The facility should determine its own NAICS code(s), based on its activities on-site using the NAICS Manual and by conducting NAICS keyword and NAICS 2 to 6-digit code searches on the Census Bureau website at:

<http://www.census.gov/eos/www/naics/>. For purposes of EPCRA Section 313 reporting, state assigned codes should not be used if they differ from codes assigned using the NAICS Manual.

### **B.2.a. Auxiliary Facilities**

Under the Standard Industrial Classification (SIC) system, an auxiliary facility was defined as one that supported another covered establishment's activities (e.g., research and development laboratories, warehouses, and storage facilities). An auxiliary facility could assume the SIC code of another covered establishment if its primary function was to service that other covered establishment's operations. The North American Industry Classification System (NAICS), that replaces the SIC system for TRI reporting, does not recognize the concept of auxiliary facilities and assigns NAICS codes to all establishments based on economic activity. In its rulemaking, "Toxic Chemical Release Reporting Using North American Industry Classification System," the TRI Program

has adopted NAICS for TRI reporting and also the NAICS treatment of former "auxiliary facilities" as entities with their own distinct NAICS code.

### **B.2.b. Multi-establishment Facilities**

Your facility may include multiple establishments that have different NAICS codes. A multi-establishment facility is a facility that consists of two or more distinct and separate economic units. If your facility is a multi-establishment facility, calculate the value added of the products produced, shipped, or services provided from each establishment within the facility and then use the following rule to determine if your facility meets the NAICS code criterion:

- If the total value added of the products produced, shipped, or services provided at establishments with covered NAICS codes is greater than 50 percent of the value added of the entire facility's products and services, the entire facility meets the NAICS code criterion.
- If anyone establishment with a covered NAICS code has a value added of services or products shipped or produced that is greater than any other establishment within the facility (40 CFR Section 372.22(b)(3)) the facility also meets the NAICS code criterion.

The value added of production or service attributable to a particular establishment may be isolated by subtracting the product value obtained from other establishments within the same facility from the total product or service value of the facility. This procedure eliminates the potential for "double counting" production and services in situations where establishments are engaged in sequential production or service activities at a single facility.

Examples include:

- A facility in coating, engraving and allied services has two establishments. The first establishment, a general automotive repair service, is in NAICS code 811113 (SIC 7537), which is not a covered NAICS code. However, the second establishment, a metal paint shop is in NAICS code 332812 (SIC 3479, which is a covered NAICS code). The metal paint shop paints the parts received from general automotive repair service. The facility

determines the product is worth \$500/unit as received from the general automotive repair service (in non-covered NAICS code 811113) and the value of the product is \$1500/unit after processing by the metal paint shop (in covered NAICS code 332812). The value added by the metal paint shop is obtained by subtracting the value of the products from the general automotive repair service from that of the value of the products of the metal paint shop. (In this example, the value added = \$1,500/unit - \$500/unit = \$1,000/unit.) The value added (\$1,000/unit) by the establishment in NAICS code 332812 is more than 50 percent of the product value. Therefore, the facility's primary NAICS code is 332812, which is a covered NAICS code.

- A food processing establishment in a facility processes crops grown at the facility in a separate establishment. To determine the value added of the products of each establishment the facility could first determine the value of the crops grown at the agricultural establishment, and then calculate the contribution of the food processing establishment by subtracting the crop value from the total value of the product shipped from the processing establishment (value of product shipped from processing - crop value = value of processing establishment).

A covered multi-establishment facility must make EPCRA Section 313 chemical threshold determinations and, if required, report all relevant information about releases and other waste management activities, and source reduction activities associated with an EPCRA Section 313 chemical **for the entire facility**, even from establishments that are not in covered NAICS codes. EPA realizes, however, that certain establishments in a multi-establishment facility can be, for all practical purposes, separate and distinct business units. Therefore, while threshold determinations must be made for the entire facility, individual establishments which compose the entire facility may report their individual releases and other waste management activities separately. However, the total releases and other waste management quantities for the entire facility must be represented by the sum of the releases and other quantities managed as waste reported by each of the separate establishments.

### **B.2.c. Property Owners**

You are not required to report if you merely own real estate on which a facility covered by this rule is located; that is, you have no other business interest in the operation of that facility (e.g., your company owns an industrial park). The operator of that facility, however, is subject to reporting requirements.

## **B.3 Activity Determination**

### **B.3.a. Definitions of Manufacture, Process, and Otherwise Use**

**Manufacture:** The term “*manufacture*” means to produce, prepare, compound, or import an EPCRA Section 313 chemical. (See Part II, Section 3.1 of these instructions for further clarification.)

Import is defined as causing the EPCRA Section 313 chemical to be imported into the customs territory of the United States. If you order an EPCRA Section 313 chemical (or a mixture containing the chemical) from a foreign supplier, then you have imported the chemical when that shipment arrives at your facility directly from a source outside of the United States. By ordering the chemical, you have caused it to be imported, even though you may have used an import brokerage firm as an agent to obtain the EPCRA Section 313 chemical.

#### ***Do Not Overlook Coincidental Manufacture***

The term “*manufacture*” also includes coincidental production of an EPCRA Section 313 chemical (e.g., as a byproduct or impurity) as a result of the manufacture, processing, otherwise use or disposal of another chemical or mixture of chemicals. In the case of coincidental production of an impurity (i.e., an EPCRA Section 313 chemical that remains in the product that is distributed in commerce), the *de minimis* exemption, discussed in Section B.3.c of these instructions, applies. The *de minimis* exemption does not apply to byproducts (e.g., an EPCRA Section 313 chemical that is separated from a process stream and further processed or disposed of). Certain EPCRA Section 313 chemicals may be manufactured as a result of wastewater treatment or other treatment processes. For example, neutralization of wastewater containing nitric acid can result in the coincidental manufacture of a nitrate compound (solution), reportable as a member of the nitrate compounds category.

## ***How to Determine if Your Facility Must Submit a Form R or Is Eligible to Use Form A***

**Process:** The term “*process*” means the preparation of a listed EPCRA Section 313 chemical, after its manufacture, for distribution in commerce. Processing is usually the incorporation of an EPCRA Section 313 chemical into a product (see Part II, Section 3.2 of these instructions for further clarification). However, a facility may process an impurity that already exists in a raw material by distributing that impurity in commerce. Processing includes preparation of the EPCRA Section 313 chemicals in the same physical state or chemical form as that received by your facility, or preparation that produces a change in physical state or chemical form. The term also applies to the processing of a mixture or other trade name product (see Section B.4.b of these instructions) that contains a listed EPCRA Section 313 chemical as one component.

**Otherwise Use:** The term “*otherwise use*” means any use of an EPCRA Section 313 chemical, including an EPCRA Section 313 chemical contained in a mixture or other trade name product or waste, that is not covered by the terms

manufacture or process. Otherwise use of an EPCRA Section 313 chemical includes disposal, stabilization (without subsequent distribution in commerce), or treatment for destruction if:

(1) The EPCRA Section 313 chemical that was disposed of, stabilized, or treated for destruction was received from off-site for the purposes of further waste management;

Or

(2) The EPCRA Section 313 chemical that was disposed of, stabilized, or treated for destruction was manufactured as a result of waste management activities on materials received from off-site for the purposes of waste management activities. Relabeling or redistributing of the EPCRA Section 313 chemical where no repackaging of the EPCRA Section 313 chemical occurs does not constitute an otherwise use or processing of the EPCRA Section 313 chemical. (See 62 FR 23846 and Part II, Section 3.3 of these instructions for further clarification).

### **Example 1: Coincidental Manufacture**

- ❑ Your company, a nitric acid manufacturer, uses aqueous ammonia in a waste treatment system to neutralize an acidic wastewater stream containing nitric acid. The reaction of ammonia and nitric acid produces a solution of ammonium nitrate. Ammonium nitrate (solution) is reportable under the nitrate compounds category and is manufactured as a byproduct. If the ammonium nitrate is produced in a quantity that exceeds the 25,000-pound manufacturing threshold, the facility must report under the nitrate compounds category.

The aqueous ammonia is considered to be otherwise used and 10 percent of the total aqueous ammonia would be counted towards the 10,000-pound otherwise use threshold. Reports for releases of ammonia must also include 10 percent of the total aqueous ammonia from the solution of ammonium nitrate (see the qualifier for the ammonia listing).

- ❑ As another example, combustion of coal or other fuel in boilers/furnaces can result in the coincidental manufacture of metal category compounds and sulfuric acid (acid aerosols), hydrochloric acid (acid aerosols), and hydrogen fluoride.

**Example 2: Typical Process and Manufacture Activities**

- Your company receives toluene, an EPCRA Section 313 chemical, from another facility, and reacts the toluene with air to form benzoic acid, which the company distributes in commerce. Your company processes toluene and manufactures and processes benzoic acid. Benzoic acid, however, is not an EPCRA Section 313 chemical and thus does not trigger reporting requirements.
- Your facility combines toluene purchased from a supplier with various materials to form paint which it then sells. Your facility processes toluene.
- Your company receives a nickel compound (nickel compounds is a listed EPCRA Section 313 chemical category) as a bulk solid and performs various size-reduction operations (e.g., grinding) before packaging the compound in 50-pound bags, which the company sells. Your company processes the nickel compound.
- Your company receives a prepared mixture of resin and chopped fiber to be used in the injection molding of plastic products. The resin contains a listed EPCRA Section 313 chemical that becomes incorporated into the plastic, which the company distributes in commerce. Your facility processes the EPCRA Section 313 chemical.
- In the combustion of coal or oil, metal category compounds may be produced from either the parent metal or a metal compound contained in the coal or oil. If a metal undergoes a change of valence, a metal compound is considered to be manufactured. For example, during the combustion process copper in valence state zero changes to copper in valence state +2 in a compound such as copper (II) oxide (CuO). Furthermore, a metallic compound could be transformed to another metallic compound without a change in valency (e.g., copper (II) chloride (CuCl<sub>2</sub>) is transformed to copper (II) oxide (CuO)). The transformation to a new compound by combustion without a change in valence state is also considered to be “manufactured” for purposes of EPCRA Section 313.

**Example 3: Typical Otherwise Use Activities**

- When your facility cleans equipment with toluene, you are otherwise using toluene. Your facility also separates two components of a mixture by dissolving one component in toluene, and subsequently recovers the toluene from the process for reuse or disposal. Your facility otherwise uses toluene.
- A covered facility receives a waste containing 12,000 pounds of Chemical A, a non-PBT EPCRA Section 313 chemical, from off-site. The facility treats the waste, destroying Chemical A and in the treatment process manufactures 10,500 pounds of Chemical B, another non-PBT EPCRA Section 313 chemical. Chemical B is disposed of on-site. Since the waste containing Chemical A was received from off-site for the purpose of waste management, the amount of Chemical A must be included in the otherwise use threshold determination for Chemical A. The otherwise use threshold for a non-PBT chemical is 10,000 pounds and since the amount of Chemical A exceeds this threshold, all releases and other waste management activities for Chemical A must be reported. Chemical B was manufactured in the treatment of a waste received from off-site. The facility disposed of Chemical B on-site. Since Chemical B was generated from waste received from off-site for treatment for destruction, disposal, or stabilization, the disposal of Chemical B is considered to be an otherwise use. Thus, the amount of Chemical B must be considered in the otherwise use threshold determination. Thus, the reporting threshold for Chemical B has also been exceeded and all releases and other waste management activities for Chemical B must be reported.

### **B.3.b. Persistent Bioaccumulative Toxic (PBT) Chemicals and Chemical Categories Overview**

On October 29, 1999, EPA published a final rule (64 FR 58666) adding certain chemicals and chemical categories to the EPCRA Section 313 list of toxic chemicals and lowering the reporting threshold for persistent bioaccumulative toxic (PBT) chemicals. In addition, on January 17, 2001 EPA published a final rule (66 FR 4500) that classified lead and lead compounds as PBT chemicals and lowered their reporting thresholds. The lower reporting thresholds for lead applies to all lead except when lead is contained in a stainless steel, brass or bronze alloy.

Dioxin and dioxin-like compounds, lead compounds, mercury compounds and polycyclic aromatic compounds (PACs) are the four PBT chemical categories with lower reporting thresholds. The 17 members of the dioxin and dioxin-like compounds category and the 21 members of the PACs category are listed in Table IIc of these instructions. The dioxin and dioxin-like compounds category has the qualifier, "Manufacturing; and the processing or otherwise use of dioxin and dioxin-like compounds if the dioxin and dioxin-like compounds are present as contaminants in a chemical and if they were created during the manufacturing of that chemical."

EPA has added six individual chemicals to the EPCRA Section 313 list of toxic chemicals that also had their thresholds lowered:

- benzo(g,h,i)perylene,
- benzo(j,k)fluorene (fluoranthene),
- 3-methylcholanthrene,
- octachlorostyrene,
- pentachlorobenzene, and
- tetrabromobisphenol A (TBBPA).

Benzo(j,k)fluorene and 3-methyl-cholanthrene were added as members of the polycyclic aromatic compounds (PACs) chemical category.

EPA lowered the reporting thresholds for PBT chemicals to either 100 pounds, 10 pounds, or in the case of the dioxin and dioxin-like compounds chemical category, to 0.1 grams. The table at the beginning of Section B.4 of these instructions lists the applicable manufacture, process, and otherwise use thresholds for the listed PBT chemicals.

EPA eliminated the *de minimis* exemption for all PBT chemicals (except lead when contained in stainless steel, brass or bronze alloy). However, this action does not affect the applicability of the *de minimis* exemption to the supplier notification requirements (40 CFR Section 372.45(d) (1)). In addition, PBT chemicals are ineligible for range reporting for on-site releases and transfers off-site for further waste management. This will not affect the applicability of range reporting of the maximum amount on-site as required by EPCRA Section 313(g).

All releases and other waste management quantities greater than 0.1 pounds of a PBT chemical (except the dioxin and dioxin like compounds chemical category) should be reported at a level of precision supported by the accuracy of the underlying data and estimation techniques on which the estimate is based. If a facility's release or other waste management estimates support reporting an amount that is more precise than whole numbers, then the more precise amount should be reported.

PBT chemical values of  $\leq 0.1$  pounds (e.g., 0.07 pounds) should either be rounded up to 0.1 pound or reported as they are if the underlying data and estimation techniques support that level of precision. It is up to the facility to determine, based on the accuracy of the underlying data and the estimation techniques on which the estimate is based, whether it would be appropriate to round the value to 0.1 pound, report the value as is, or round the value to zero.

For the dioxin and dioxin-like compounds chemical category, which has a reporting threshold of 0.1 grams, facilities need only report all release and other waste management quantities greater than 100 micrograms (i.e., 0.0001 grams). Notwithstanding the numeric precision used when determining reporting eligibility thresholds, facilities should report on the Form R to the level of accuracy that their data supports, up to seven digits to the right of the decimal. EPA's reporting software and data management systems support data precision to seven digits to the right of the decimal. If a facility has information on the individual members of the dioxin and dioxin-like compounds category they will also need to report the release and transfer quantities of each congener (see instructions in Section D).

### **Lead and Lead Compounds**

Lead and lead compounds are classified as PBT chemicals and are subject to the lower manufacturing, processing and otherwise use threshold of 100 pounds. However, when lead is contained in stainless steel, brass, or bronze alloys it remains subject to the higher 25,000 pound manufacturing and processing thresholds and the 10,000 pound otherwise use threshold.

Listed below are some important guidelines to use when calculating threshold and release and other waste management quantities for lead and lead compounds:

- 1) quantities of lead not contained in stainless steel, brass or bronze alloy are applied to both the 100 pound threshold and the 25,000/10,000 pound thresholds;
- 2) quantities of lead that are contained in stainless steel, brass or bronze alloys are only applied toward the 25,000/10,000 pound thresholds;
- 3) a facility may take the *de minimis* exemption for those quantities of lead in stainless steel, brass, or bronze alloys that meet the *de minimis* standard (e.g., manufactured as an impurity). Accordingly, the *de minimis* exemption may be considered for quantities of lead in stainless steel, brass, or bronze alloys but it may not be considered for lead not in stainless steel, brass, or bronze alloys;
- 4) If a facility exceeds the 100-pound threshold for lead other than in stainless steel, brass, or bronze alloys, the facility may not apply Form A eligibility for non-PBTs, range reporting in Sections 5 and 6 of the Form R or the use of whole numbers and 2 significant digits to any of the lead they report. If a facility that exceeds the 25,000/10,000 pound threshold for lead in stainless steel, brass, or bronze alloy without tripping the 100-pound threshold for non-alloyed lead, the facility may consider the Form A requirements for non-PBTs, range reporting in Sections 5 and 6 of the Form R, and the use of whole numbers and 2 significant digits.

### **B.3.c. Activity Exemptions**

**Otherwise Use Exemptions.** Certain otherwise uses of listed EPCRA Section 313 chemicals are specifically exempted:

- Otherwise use as a structural component of the facility;
- Otherwise use in routine janitorial or facility grounds maintenance;
- Personal uses by employees or other persons;
- Otherwise use of products containing EPCRA Section 313 chemicals for the purpose of maintaining motor vehicles operated by the facility; and
- Otherwise use of EPCRA Section 313 chemicals contained in intake water (used for processing or non-contact cooling) or in intake air (used either as compressed air or for combustion).

The exemption of an EPCRA Section 313 chemical otherwise used 1) as a structural component of the facility; or 2) in routine janitorial or facility grounds maintenance; or 3) for personal use by an employee cannot be taken for activities involving process related equipment.

**Articles Exemption.** EPCRA Section 313 chemicals contained in articles that are processed or otherwise used at a covered facility are exempt from threshold determinations and release and other waste management calculations. The exemption applies when the facility receives the article from another facility or when the facility produces the article itself. The exemption applies only to the quantity of EPCRA Section 313 chemical present in the article. If the EPCRA Section 313 chemical is manufactured (including imported), processed, or otherwise used at the covered facility other than as part of the article, in excess of an applicable threshold quantity, the facility is required to report that use of a chemical (40 CFR Section 372.38(b)). For an EPCRA Section 313 chemical in an item to be exempt as part of the article, the item must meet all the following criteria in the EPCRA Section 313 article definition; that is, it must be a manufactured item (1) which is formed to a specific shape or design during manufacture, (2) which has end use functions dependent in whole or in part upon its shape or design during end use, and (3) which does not release a toxic chemical under normal conditions of processing or use of the item at the facility.

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If the processing or otherwise use of all like items results in a total release of 0.5 pound or less of an EPCRA Section 313 chemical in a reporting year to any environmental medium, EPA will allow this release to be rounded to zero, and the manufactured items retain their article status. The 0.5 pound threshold does not apply to each individual article, but applies to the sum of all releases from processing or otherwise use of all like articles. If all the releases of like articles over a reporting year are completely captured and recycled/reused on-site or off-site, those items retain their article status. Any amount that is released and is not recycled/reused will count toward the 0.5 pound per year cut off value.

The articles exemption applies to the normal processing or use of articles. This exemption does not apply to the manufacture of the article. EPCRA Section 313 chemicals incorporated into articles produced at a facility must be factored into threshold determinations and release and other waste management calculations.

### **Example 4: Articles Exemption**

- ❑ Nickel that is incorporated into a brass doorknob is processed to manufacture the brass doorknob, and therefore must be counted toward threshold determinations and release and other waste management calculations. However, the use of the brass doorknobs elsewhere in the facility does not have to be counted. Disposal of the brass doorknob after its use does not constitute a “release;” thus, the brass doorknob remains an article.
- ❑ If an item used in the facility is fragmented, the item is still an article if those fragments being discarded remain identifiable as the article (e.g., recognizable pieces of a cylinder, pieces of wire). For instance, an eight-foot piece of wire is cut into two four-foot pieces of wire, without releasing any EPCRA Section 313 chemicals. Each four-foot piece is identifiable as a piece of wire; therefore, the article status for these pieces of wire remains intact.
- ❑ EPCRA Section 313 chemicals received in the form of pellets are not articles because the pellet form is simply a convenient form for further processing of the material.

If, in the course of processing or use, an item retains its initial thickness or diameter, in whole or in part, it meets the first part (i.e., it must be a manufactured item which is formed to a specific shape or design during manufacture) of the article definition. If the item’s basic dimensional characteristics are totally altered during processing or otherwise use, the item does not meet the first part of the definition. An example of items that do not meet the definition would be items that are cold extruded, such as lead ingots, which are formed into wire or rods. On the other hand, cutting a manufactured item into pieces that are recognizable as the article would not change the original dimensions as long as the diameter or the thickness of the item remained the same; the articles exemption would continue to apply. Metal wire may be bent and sheet metal may be cut, punched, stamped, or pressed without losing their article status as long as the diameter of the wire or tubing or the thickness of the sheet is not totally changed.

What constitutes a release of an EPCRA Section 313 chemical is important since processing or otherwise use of articles that result in a release to the environment (or more than 0.5 pounds) negate the article status and precludes eligibility for the exemption. Cutting, grinding, melting, or other processing of manufactured items could result in a release of an EPCRA Section 313 chemical during normal conditions of processing or otherwise use and therefore negate the exemption as articles.

***De Minimis Exemption.*** The *de minimis* exemption allows facilities to disregard certain minimal concentrations of non-PBT chemicals in mixtures or other trade name products when making threshold determinations and release and other waste management calculations. The *de minimis* exemption does not apply to the manufacture of an EPCRA Section 313 chemical except if that EPCRA Section 313 chemical is manufactured as an impurity and remains in the product distributed in commerce, or if the EPCRA Section 313 chemical is imported below the appropriate *de minimis* level. The *de minimis* exemption does not apply to a byproduct manufactured coincidentally as a result of manufacturing, processing, otherwise use, or any waste management activities. The *de minimis* exemption does not apply to any PBT chemical (except lead when it is contained in stainless steel, brass or bronze alloy) or PBT chemical category. A list of PBT chemicals may be found in Section B.4 of these instructions.

## ***How to Determine if Your Facility Must Submit a Form R or Is Eligible to Use Form A***

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When determining whether the *de minimis* exemption applies to an EPCRA Section 313 chemical, the owner/operator must consider the concentration of the non-PBT EPCRA Section 313 chemical in mixtures and other trade name products. If the non-PBT EPCRA Section 313 chemical in a mixture or other trade name product is manufactured as an impurity, imported, processed, or otherwise used and is below the appropriate *de minimis* concentration level, then the quantity of the non-PBT EPCRA Section 313 chemical in that mixture or other trade name product does not have to be applied to threshold determinations nor included in release or other waste management determinations. If a non-PBT EPCRA Section 313 chemical in a mixture or other trade name product is below the appropriate *de minimis* level, all releases and other waste management activities associated with the EPCRA Section 313 chemical in that mixture or other trade name product are exempt from EPCRA Section 313 reporting. It is possible to meet an activity (e.g., processing) threshold for an EPCRA Section 313 chemical on a facility wide basis, but not be required to calculate releases or other waste management quantities associated with a particular process because that process involves only mixtures or other trade name products containing the non-PBT EPCRA Section 313 chemical below the *de minimis* level.

EPA interprets the *de minimis* exemption such that once a non-PBT EPCRA Section 313 chemical concentration is at or above the appropriate *de minimis* level in the mixture or other trade name product threshold determinations and release and other waste management calculations must be made, even if that chemical later falls below the *de minimis* level in the same mixture or other trade name product. Thus, EPA considers reportable all releases and other quantities managed as waste that occur after the *de minimis* level has been met or exceeded. If an EPCRA Section 313 chemical in a mixture or other trade name product at or above *de minimis* is

brought on-site, the *de minimis* exemption never applies.

*De minimis* levels for non-PBT EPCRA Section 313 chemicals and chemical categories are set at concentration levels of either 1 percent or 0.1 percent; PBT chemicals and chemical categories do not have *de minimis* levels with regard to this exemption. The 0.1 percent *de minimis* levels are dictated by determinations made by the National Toxicology Program (NTP) in its Annual Report on Carcinogens, the International Agency for Research and Cancer (IARC) in its Monographs, or 29 CFR part 1910, subpart Z. Therefore, once a non-PBT chemical's status under NTP, IARC, or 29 CFR part 1910, subpart Z indicates that the chemical is a carcinogen or potential carcinogen, the reporting facility may disregard levels of the chemical below the 0.1 percent *de minimis* concentration provided that the other criteria for the *de minimis* exemption are met. *De minimis* levels for chemical categories apply to the total concentration of all chemicals in the category within a mixture, not the concentration of each individual category member within the mixture.

### ***De Minimis Application to the Processing or Otherwise Use of a Mixture***

The *de minimis* exemption applies to the processing or otherwise use of a non-PBT EPCRA Section 313 chemical in a mixture. Threshold determinations and release and other waste management calculations begin at the point where the chemical meets or exceeds the *de minimis* level. If a non-PBT EPCRA Section 313 chemical is present in a mixture at a concentration below the *de minimis* level, this quantity of the substance does not have to be included for threshold determinations, release and other waste management reporting, or supplier notification requirements. The exemption will apply as long as the mixture containing *de minimis* amounts of a non-PBT EPCRA Section 313 chemical never equals or goes above the *de minimis* limit.



**Example 5: *De Minimis* Applications to Process and Otherwise Use Scenarios for Non-PBT Chemicals**

There are many cases in which the *de minimis* “limit” is crossed or re-crossed by non-PBT chemicals within a process or otherwise use scenario. The following examples are meant to illustrate these complex reporting scenarios.

**Increasing Concentration To or Above *De Minimis* Levels During Processing for Non-PBT Chemicals**

A manufacturing facility receives toluene that contains chlorobenzene at a concentration below its *de minimis* limit. Through distillation, the chlorobenzene content in process streams is increased over the *de minimis* concentration of 1 percent. From the point at which the chlorobenzene concentration equals 1 percent in process streams, the amount present must be factored into threshold determinations and release and other waste management estimates. The facility does not need to consider the amount of chlorobenzene in the raw material when below *de minimis* levels, i.e., prior to distillation to 1 percent, when making threshold determinations. The facility does not have to report emissions of chlorobenzene from storage tanks or any other equipment associated with that specific process where the chlorobenzene content is less than 1 percent.

**Fluctuating Concentration During Processing for Non-PBT Chemicals**

A manufacturer produces an ink product that contains toluene, an EPCRA Section 313 chemical, below the *de minimis* level. The process used causes the percentage of toluene in the mixture to fluctuate: it rises above the *de minimis* level for a time but drops below the level as the process winds down. The facility must consider the chemical toward threshold determinations from the point at which it first equals the *de minimis* limit. Once the *de minimis* limit has been met the exemption cannot be taken.

**Concentration Ranges Straddling the *De Minimis* Value**

There may be instances in which the concentration of a non-PBT chemical is given as a range straddling the *de minimis* limit. Example 6 illustrates how the *de minimis* exemption should be applied in such a scenario.

***De Minimis* Application in the Manufacture of the Listed Chemical in a Mixture**

The *de minimis* exemption generally does not apply to the manufacturing of an EPCRA Section 313 chemical. However, the *de minimis* exemption may apply to mixtures and other trade name products containing non-PBT EPCRA Section 313 chemicals that are imported into the United States. (See Example 5)

The exemption also applies to non-PBT EPCRA Section 313 chemicals that are manufactured as

impurities that remain in the product distributed in commerce below the *de minimis* levels. The amount remaining in the product is exempt from threshold determinations. If the chemical is separated from the final product, it cannot qualify for the exemption. Any amount that is separated, or is separate, from the product, is considered a byproduct and is subject to threshold determinations and release and other waste management calculations. Any amount of an EPCRA Section 313 chemical that is manufactured in a waste stream must be considered toward threshold determinations and release and other waste management calculations and accounted for on Form R even if that chemical is manufactured below the *de minimis* level.

The *de minimis* exemption also does not apply to situations where a toxic chemical in waste is diluted to below the *de minimis* level.

**Example 6: Concentration Ranges Straddling the *De Minimis* Value**

**Scenario 1:** A facility processes 8,000,000 pounds of a mixture containing 0.25 to 1.25 percent manganese. Manganese is eligible for the *de minimis* exemption at concentrations up to 1 percent. The amount of mixture subject to reporting is the quantity containing manganese at or above the *de minimis* concentration:

$$[(8,000,000) \times (1.25\% - 0.99\%)] \div (1.25\% - 0.25\%)$$

The average concentration of manganese that is not exempt (above the *de minimis*) is:

$$(1.25\% + 1.00\%) \div (2)$$

Therefore, the amount of manganese that is subject to threshold determination and release and other waste management estimates is:

$$\left[ \frac{(8,000,000) \times (1.25\% - 0.99\%)}{(1.25\% - 0.25\%)} \right] \times \left[ \frac{(1.25\% + 1.00\%)}{(2)} \right] = 23,400 \text{ pounds}$$

$$= 23,400 \text{ pounds manganese (which is below the processing threshold for manganese)}$$

In this scenario, because the facility's information pertaining to manganese was available to two decimal places, 0.99 was used to determine the amount below the *de minimis* concentrations. If the information was available to one decimal place, 0.9 should be used, as in the scenario below.

**Scenario 2:** As in the previous example, manganese is present in a mixture, of which 8,000,000 pounds is processed. The MSDS states the mixture contains 0.2 percent to 1.2 percent manganese. The amount of mixture subject to reporting (at or above *de minimis* limit) is:

$$[(8,000,000) \times (1.2\% - 0.9\%)] \div (1.2\% - 0.2\%)$$

The average concentration of manganese that is not exempt (at or above *de minimis* limit) is:

$$(1.2\% + 1.0\%) \div (2)$$

Therefore, the amount of manganese that is subject to threshold determinations and release and other waste management estimates is:

$$\left[ \frac{(8,000,000) \times (1.2\% - 0.9\%)}{(1.2\% - 0.2\%)} \right] \times \left[ \frac{(1.2\% + 1.0\%)}{(2)} \right] = 26,400 \text{ pounds}$$

$$= 26,400 \text{ pounds manganese (which is above the processing threshold for manganese)}$$

**Example 7: *De Minimis* Application in the Manufacture of a Toxic Chemical in a Mixture**

**Manufacture as a Product Impurity**

Toluene 2,4 diisocyanate reacts with trace amounts of water to form trace quantities of 2,4-diaminotoluene. The resulting product contains 99 percent toluene 2,4-diisocyanate and 0.05 percent 2,4-diaminotoluene. The 2,4 diaminotoluene would not be subject to EPCRA Section 313 reporting nor would supplier notification be required because the concentration of 2,4- diaminotoluene is below its *de minimis* limit of 0.1 percent in the product.

**Manufacture as a Commercial Byproduct and Impurity**

Chloroform is a reaction byproduct in the production of carbon tetrachloride. It is removed by distillation to a concentration of less than 150 ppm (0.0150 percent) remaining in the carbon tetrachloride. The separated chloroform at 90 percent concentration is sold as a byproduct. Chloroform is subject to a 0.1 percent (1000 ppm) *de minimis* limit. Any amount of chloroform manufactured and separated as byproduct must be included in threshold determinations because EPA does not interpret the *de minimis* exemption to apply to the manufacture of a chemical as a byproduct. Releases of chloroform prior to and during purification of the carbon tetrachloride must be reported. The *de minimis* exemption can, however, be applied to the chloroform remaining in the carbon tetrachloride as an impurity. Because the concentration of chloroform remaining in the carbon tetrachloride is below the *de minimis* limit, this quantity of chloroform is exempt from threshold determinations, release and other waste management reporting, and supplier notification.

**Manufacture as a Waste Byproduct**

A small amount of formaldehyde is manufactured as a reaction byproduct during the production of phthalic anhydride. The formaldehyde is separated from the phthalic anhydride as a waste gas and burned, leaving no formaldehyde in the phthalic anhydride. The amount of formaldehyde produced and removed must be included in threshold determinations and release and other waste management estimates even if the formaldehyde were present below the *de minimis* level in the process stream where it was manufactured or in the waste stream to which it was separated because EPA does not interpret mixtures and trade name products to includes wastes.

**Laboratory Activities Exemption.** EPCRA Section 313 chemicals that are manufactured, processed, or otherwise used in a laboratory at a covered facility under the direct supervision of a technically qualified individual do not have to be considered for threshold determinations and release and other waste management calculations. However, pilot plant scale and specialty chemical production does not qualify for this laboratory activities exemption, nor does the use of EPCRA Section 313 chemicals for laboratory support activities, such as the use of chemicals for equipment maintenance.

**Coal Extraction Activities Exemption.** If an EPCRA Section 313 chemical is manufactured, processed, or otherwise used in extraction by facilities in NAICS codes 212111, 212112 and 212113, a person is not required to consider the quantity of the EPCRA Section 313 chemical so

manufactured, processed, or otherwise used when considering threshold determinations and release and other waste management calculations (see Example 8). Reclamation activities occurring simultaneously with coal extraction activities (e.g., cast blasting) are included in the exemption. However, otherwise use of ash, waste rock, or fertilizer for reclamation purposes are not considered part of extraction; non-exempt amounts of EPCRA Section 313 chemicals contained in these materials must be considered toward threshold determinations and release and other waste management calculations.

**Metal Mining Overburden Exemption.** If an EPCRA Section 313 chemical that is a constituent of overburden is processed or otherwise used by facilities in NAICS codes 212221, 212222, 212231, 212234, and 212299, a person is not required to

## ***How to Determine if Your Facility Must Submit a Form R or Is Eligible to Use Form A***

consider the quantity of the EPCRA Section 313 chemical so processed or otherwise used when considering threshold determinations and release and other waste management calculations.

For purposes of EPCRA Section 313 reporting, overburden is the unconsolidated material that overlies a deposit of useful material or ore. It does not include any portion of the ore or waste rock.

### **Example 8: Coal mining extraction activities**

Included among these are explosives for blasting operations, solvents, lubricants, and fuels for extraction related equipment maintenance and use, as well as overburden and mineral deposits. The EPCRA Section 313 chemicals contained in these materials are exempt from threshold determinations and release and other waste management calculations, when manufactured, processed or otherwise used during extraction activities at coal mines.

### **B.4 Threshold Determinations**

EPCRA Section 313 reporting is required if threshold quantities are exceeded. Separate thresholds apply to the amount of the EPCRA Section 313 chemical that is manufactured, processed or otherwise used.

You must submit a report for any EPCRA Section 313 chemical that is not listed as a PBT chemical and which is manufactured or processed at your facility in excess of the following threshold:

- 25,000 pounds per toxic chemical or category over the calendar year.
- You must submit a report for any EPCRA Section 313 chemical which is not listed as a PBT chemical and that is otherwise used at your facility in excess of 10,000 pounds per toxic chemical or category over the calendar year.

You must submit a report for any EPCRA Section 313 chemical that is listed as a PBT chemical and which is manufactured, processed or otherwise used at your facility above the designated threshold for that chemical.

The PBT chemical names, Chemical Abstracts Service (CAS) numbers and their reporting thresholds are listed in the table below. See Table IIc of these instructions for lists of individual members of the dioxin and dioxin-like compounds chemical category and the polycyclic aromatic compounds (PACs) chemical category.

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<b>Chemical or chemical category name</b>	<b>CAS number or chemical category code</b>	<b>Threshold (pounds, unless noted otherwise)</b>
Aldrin	309-00-2	100
Benzo[g,h,i]perylene	191-24-2	10
Chlordane	57-74-9	10
Dioxin and dioxin-like compounds category (manufacturing; and the processing or otherwise use of dioxin and dioxin-like compounds category if the dioxin and dioxin-like compounds are present as contaminants in a chemical and if they were created during the manufacturing of that chemical)	N150	0.1 gram
Heptachlor	76-44-8	10
Hexachlorobenzene	118-74-1	10
Isodrin	465-73-6	10
Lead (this lower threshold does not apply to lead when it is contained in stainless steel, brass or bronze alloy)	7439-92-1	100
Lead compounds	N420	100
Mercury	7439-97-6	10
Mercury compounds	N458	10
Methoxychlor	72-43-5	100
Octachlorostyrene	29082-74-4	10
Pendimethalin	40487-42-1	100
Pentachlorobenzene	608-93-5	10
Polychlorinated biphenyls (PCBs)	1336-36-3	10
Polycyclic aromatic compounds category (PACs)	N590	100
Tetrabromobisphenol A	79-94-7	100
Toxaphene	8001-35-2	10
Trifluralin	1582-09-8	100

### **B.4.a. How to Determine if Your Facility Has Exceeded Thresholds**

To determine whether your facility has exceeded an EPCRA Section 313 reporting threshold, compare quantities of EPCRA Section 313 chemicals that you manufacture, process, or otherwise use to the respective thresholds for those activities. A worksheet is provided in Figure 3A to assist facilities in determining whether they exceed any of the reporting thresholds for non-PBT chemicals; Figures 3B-D provide worksheets for PBT chemicals. (The worksheets can be found at the end of section B.5.) These worksheets also provide a format for maintaining reporting facility records. Use of these worksheets is not required and the completed worksheet(s) should not accompany Form R reports submitted to EPA and the state or tribe. Additionally, EPA provides an online threshold screening tool at:

<http://www2.epa.gov/toxics-release-inventory-tri-program/tri-threshold-screening-tool>.

Complete the appropriate worksheet for each EPCRA Section 313 chemical or chemical category. Base your threshold determination for EPCRA Section 313 chemicals with qualifiers only on the quantity of the EPCRA Section 313 chemical satisfying the qualifier.

Use of the worksheets is divided into three steps:

- *Step 1* allows you to record the gross amount of the EPCRA Section 313 chemical or chemical category involved in activities throughout the facility. Pure forms as well as the amounts of the EPCRA Section 313 chemical or chemical category present in mixtures or other trade name products must be considered. The types of activity (i.e., manufacturing, processing, or otherwise using) for which the EPCRA Section 313 chemical is used must be identified because separate thresholds apply to each of these activities. A record of the information source(s) used should be kept. Possible information sources include purchase records, inventory data, and calculations by a process engineer. The data collected in Step 1 will be totaled for each activity to identify the overall amount of the EPCRA Section 313 chemical or chemical category manufactured (including imported), processed, or otherwise used.

## ***How to Determine if Your Facility Must Submit a Form R or Is Eligible to Use Form A***

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- *Step 2* allows you to identify uses of the EPCRA Section 313 chemical or chemical category that were included in Step 1 but are exempt under EPCRA Section 313. Do not include in Step 2 exempt quantities of the EPCRA Section 313 chemical not included in the calculations in Step 1. For example, if Freon contained in the building's air conditioners was not reported in Step 1, you would not include the amount as exempt in Step 2. Step 2 is intended for use when a quantity or use of the EPCRA Section 313 chemical is exempt while other quantities require reporting. Note the type of exemption for future reference. Also identify, if applicable, the fraction or percentage of the EPCRA Section 313 chemical present that is exempt. Add the amounts in each activity to obtain a subtotal for exempted amounts of the EPCRA Section 313 chemical or chemical categories at the facility.
- *Step 3* involves subtracting the result of Step 2 from the results of Step 1 for each activity. Compare this net sum to the applicable activity threshold. If the threshold is exceeded for any of the three activities, a facility must submit a Form R for that EPCRA Section 313 chemical or chemical category. Do not sum quantities of the EPCRA Section 313 chemical that are manufactured, processed, and otherwise used at your facility, because each of these activities requires a separate threshold determination. For example, if in a calendar year you processed 20,000 pounds of a non-PBT EPCRA Section 313 chemical and you otherwise used 6,000 pounds of that same chemical, your facility has not exceeded any applicable threshold and thus is not required to report for that chemical.

Worksheets should be retained to document your determination for reporting or not reporting, but should not be submitted with the report.

You must submit a report if you exceed any threshold for any EPCRA Section 313 chemical or chemical category. For example, if your facility processes 22,000 pounds of a non-PBT EPCRA Section 313 chemical and also otherwise uses 16,000 pounds of that same chemical, it has exceeded the otherwise use threshold (10,000 pounds for a non-PBT chemical) and your facility must report even though it did not exceed the process threshold (25,000 pounds for a non-PBT chemical). In preparing your reports, you must

consider all non-exempted activities and all releases and other waste management quantities of the EPCRA Section 313 chemical from your facility, not just releases and other waste management quantities from the otherwise use activity.

Also note that threshold determinations are based upon the actual amounts of an EPCRA Section 313 chemical manufactured, processed, or otherwise used over the course of the calendar year. The threshold determination may not relate to the amount of an EPCRA Section 313 chemical brought on-site during the calendar year. For example, if a stockpile of 100,000 pounds of a non-PBT EPCRA Section 313 chemical is present on-site but only 20,000 pounds of that chemical is applied to a process, only the 20,000 pounds processed is counted toward a threshold determination, not the entire 100,000 pounds of the stockpile.

### **B.4.b. Threshold Determinations for On-Site Reuse Operations**

Threshold determinations of EPCRA Section 313 chemicals that are reused at the facility are based only on the amount of the EPCRA Section 313 chemical that is added during the year, not the total volume in the system. For example, a facility operates a refrigeration unit that contains 15,000 pounds of anhydrous ammonia at the beginning of the year. The system is charged with 2,000 pounds of anhydrous ammonia during the year. The facility has therefore "otherwise used" only 2,000 pounds of anhydrous ammonia, a non-PBT EPCRA Section 313 chemical, which is below the otherwise use threshold for anhydrous ammonia and is not required to report (unless there are other "otherwise use" activities of ammonia, that when taken together, exceed the reporting threshold). If, however, the whole refrigeration unit was recharged with 15,000 pounds of anhydrous ammonia during the year, then the facility would have exceeded the otherwise use threshold, and would be required to report.

This does not apply to EPCRA Section 313 chemicals "recycled" or "reused" off-site and returned to a facility. Such EPCRA Section 313 chemicals returned to a facility are treated as the equivalent of newly purchased material for purposes of EPCRA Section 313 threshold determinations.

#### **B.4.c. Threshold Determinations for Ammonia**

The listing for ammonia includes the modifier “includes anhydrous ammonia and aqueous ammonia from water dissociable ammonium salts and other sources; 10 percent of total aqueous ammonia is reportable under this listing.” The qualifier for ammonia means that anhydrous forms of ammonia are 100 percent reportable and aqueous forms are limited to 10 percent of total aqueous ammonia. Therefore, when determining threshold quantities, 100 percent of anhydrous ammonia is included but only 10 percent of total aqueous ammonia is included. If any ammonia evaporates from aqueous ammonia solutions, 100 percent of the evaporated ammonia is included in threshold determinations.

For example, if a facility processes aqueous ammonia, it has processed 100 percent of the aqueous ammonia in that solution. If the ammonia remains in solution, then 10 percent of the total aqueous ammonia is counted towards the threshold. If there are any evaporative losses of anhydrous ammonia, then 100 percent of those losses must be counted towards the processing threshold. If the manufacturing, processing, or otherwise use threshold for the ammonia listing is exceeded, the facility must report 100 percent of these evaporative losses in Sections 5 and 8 of the Form R.

#### **B.4.d. Threshold Determinations for Chemical Categories**

A number of chemical compound categories are subject to reporting. See Table IIc for a listing of these EPCRA Section 313 chemical categories. When preparing threshold determinations for one of these EPCRA Section 313 chemical categories, all individual members of a category that are manufactured, processed, or otherwise used must be counted. Where generic names are used at a facility, threshold determinations should be based on CAS numbers. For example, Poly-Solv EB does not appear among the reportable chemicals in Table IIa or IIb but its CAS number indicates Poly-Solv EB is a synonym for ethylene glycol mono-n-butyl ether, a member of the certain glycol ethers chemical category (code N230). For chemical compound categories, threshold determinations must be made separately for each of the three activities. Do not include in these threshold determinations for a category any chemicals that are also individually

listed EPCRA Section 313 chemicals (see Table IIa or IIb). Individually listed EPCRA Section 313 chemicals are subject to their own individual threshold determination.

#### **Organic Compounds**

For the organic compound categories, you are required to account for the entire weight of all compounds within a specific compound category (e.g., glycol ethers) at the facility for BOTH the threshold determination and release and other waste management estimates.

#### **Metal Category Compounds**

Threshold determinations for metal category compounds present a special case. If, for example, your facility processes several different nickel compounds, base your threshold determination on the total weight of all nickel compounds processed. However, if your facility processes both the “parent” metal (nickel) as well as one or more nickel compounds, you must make threshold determinations for both nickel (CAS number 7440-02-0) and nickel compounds (chemical category code N495) because they are separately listed EPCRA Section 313 chemicals. If your facility exceeds thresholds for both the parent metal and compounds of that same metal, EPA allows you to file one combined report (e.g., one report for nickel compounds, including nickel) because the release information you will report in connection with metal category compounds will be the total pounds of the metal released. If you file one combined report, you should put the name of the metal compound category on the Form R. In the example above, the facility that exceeded reporting thresholds for both the nickel and nickel compounds chemical category could submit a single Form R for the nickel compounds chemical category, which would contain release and other waste management information for both nickel and nickel compounds. Do not put both names on the Form R.

The case of metal category compounds involving more than one metal should be noted. Some metal category compounds may contain more than one listed metal. For example, lead chromate is both a lead compound and a chromium compound. In such cases, if applicable thresholds are exceeded, you are required to file two separate reports, one for lead compounds and one for chromium compounds. Apply the total weight of the lead chromate to the

threshold determinations for both lead compounds and chromium compounds. (Note: Only the quantity of each parent metal released or otherwise managed as waste, not the quantity of the compound, would be reported on the appropriate sections of both Form Rs. See B.5.)

**Nitrate Compounds (water dissociable; reportable only when in aqueous solution)**

For the category nitrate compounds (water dissociable; reportable only when in aqueous solution), the entire weight of the nitrate compound is counted in making threshold determinations. A nitrate compound is covered by this listing only when in water and only if dissociated. If no information is available on the identity of the type of nitrate that is manufactured, processed or otherwise used, assume that the nitrate compound exists as sodium nitrate.

**B.4.e Threshold Determination for Persistent Bioaccumulative Toxic (PBT) Chemicals**

There are two separate thresholds for EPCRA Section 313 PBT chemicals; these thresholds are set based on the chemicals' potential to persist and bioaccumulate in the environment. The manufacturing, processing and otherwise use thresholds for PBT chemicals is 100 pounds, while for the subset of PBTs chemicals that are highly persistent and highly bioaccumulative, it is 10 pounds. One exception is the dioxin and dioxin-like compounds chemical category. The threshold for this category is 0.1 gram. The PBT chemicals, their CAS numbers or chemical category code, and their reporting thresholds are listed in a table in the introductory section of B.4. See Table IIc of these instructions for lists of individual members of the dioxin and dioxin-like compounds chemical category and the polycyclic aromatic compounds (PACs) chemical category.

**B.4.f. Mixtures and Other Trade Name Products**

EPCRA Section 313 chemicals contained in mixtures and other trade name products must be factored into threshold determinations and release and other waste management calculations.

If your facility processed or otherwise used mixtures or other trade name products during the calendar

year, you are required to use the best readily available data (or reasonable estimates if such data are not readily available) to determine whether the toxic chemicals in a mixture meet or exceed the *de minimis* concentration and, therefore, whether they must be included in threshold determinations and release and other waste management calculations. If you know that a mixture or other trade name product contains a specific EPCRA Section 313 chemical, combine the amount of the EPCRA Section 313 chemical in the mixture or other trade name product with other amounts of the same EPCRA Section 313 chemical processed or otherwise used at your facility for threshold determinations and release and other waste management calculations. If you know that a mixture contains an EPCRA Section 313 chemical but it is present below the *de minimis* level, you do not have to consider the amount of the EPCRA Section 313 chemical present in that mixture for purposes of threshold determinations and release and other waste management calculations. PBT chemicals are not eligible for the *de minimis* exemption except lead when it is contained in stainless steel, brass or bronze alloy.

Observe the following guidelines in estimating concentrations of EPCRA Section 313 chemicals in mixtures when only limited information is available:

- If you only know the upper bound concentration, you must use it for threshold determinations (40 CFR Section 372.30(b)(ii)).
- If you know the lower and upper bound concentrations of an EPCRA Section 313 chemical in a mixture, EPA recommends you use the midpoint of these two concentrations for threshold determinations.
- If you know only the lower bound concentration, EPA recommends you subtract out the percentages of any other known components to determine a reasonable upper bound concentration, and then determine a midpoint.
- If you have no information other than the lower bound concentration, EPA recommends you calculate a midpoint assuming an upper bound concentration of 100 percent.



**B.5 Release and Other Waste Management Determinations for Metals, Metal Category Compounds, and Nitrate Compounds**

**Metal Category Compounds**

Although the complete weight of the metal category compounds must be used in threshold determinations for the metal compounds category, only the weight of the metal portion of the metal category compound must be considered for release and other waste management determinations. Remember that for metal category compounds that consist of more than one metal, release and other waste management reporting must be based on the weight of each metal, provided that the appropriate thresholds have been exceeded.

**Metals and Metal Category Compounds**

For compounds within the metal compound categories, only the metal portion of the metal category compound must be considered in determining release and other waste management quantities for the metal category compounds. Therefore, if thresholds are separately exceeded for both the “parent” metal and its compounds, EPA allows you to file a combined Form R for the “parent” metal and its category compounds. This

Form R would contain all of the release and other waste management information for both the “parent” metal and metal portion of the related metal category compounds. For example, you exceed thresholds for chromium. You also exceed thresholds for chromium compounds. Instead of filing two Form Rs you can file one combined Form R. This Form R would contain information on quantities of chromium released or otherwise managed as waste and the quantities of the chromium portion of the chromium compounds released or otherwise managed as waste. When filing one combined Form R for an EPCRA Section 313 metal and metal compound category, facilities should identify the chemical reported as the metal compound category name and code in Section 1 of the Form R. Note that this does not apply to the Form A. See Section E.7 in these instructions on the Form A. See Appendix B for more information about reporting the release and other waste management of metals and metal compounds.

**Nitrate Compounds (water dissociable; reportable only in aqueous solution)**

Although the complete weight of the nitrate compound must be used for threshold determinations for the nitrate compounds category only the nitrate portion of the compound should be used for release and other waste management calculations.

**Example 9: Mixtures and Other Trade Name Products**

**Scenario #1:** Your facility otherwise uses 12,000 pounds of an industrial solvent (Solvent X) for equipment cleaning. The Material Safety Data Sheet (MSDS) for the solvent indicates that it contains at least 50 percent n-hexane, an EPCRA Section 313 chemical; however, it also states that the solvent contains 20 percent non-hazardous surfactants. This is the only n-hexane-containing mixture used at the facility.

EPA recommends you follow these steps to determine if the quantity of the EPCRA Section 313 chemical in Solvent X exceeds the threshold for otherwise use.

- 1) Determine a reasonable maximum concentration for the EPCRA Section 313 chemical by subtracting out the non-hazardous surfactants (i.e.,  $100\% - 20\% = 80\%$ ).
- 2) Determine the midpoint between the known minimum (50%) and the reasonable maximum calculated above (i.e.,  $(80\% + 50\%)/2 = 65\%$ ).
- 3) Multiply total weight of Solvent X otherwise used by 65% (0.65).  
 $12,000 \text{ pounds} \times 0.65 = 7,800 \text{ pounds}$
- 4) Because the total amount of n-hexane otherwise used at the facility was less than the 10,000-pound otherwise use threshold, the facility is not required to file a Form R for n-hexane.

**Scenario #2:** Your facility otherwise used 15,000 pounds of Solvent Y to clean printed circuit boards. The MSDS for the solvent lists only that Solvent Y contains at least 80 percent of an EPCRA Section 313 chemical that is only identified as chlorinated hydrocarbons.

EPA recommends you follow these steps to determine if the quantity of the EPCRA Section 313 chemical in the solvent exceeds the threshold for otherwise use.

- 1) Because the specific chemical is unknown, the Form R will be filed for “chlorinated hydrocarbons.” This name will be entered into Part II, Section 2.1, “Mixture Component Identity.” (Note: Because your supplier is claiming the EPCRA Section 313 chemical identity a trade secret, you do not have to file substantiation forms.)
- 2) The upper bound limit is assumed to be 100 percent and the lower bound limit is known to be 80 percent. Using this information, the specific concentration is estimated to be 90 percent (i.e., the mid-point between upper and lower limits).  
 $(100\% + 80\%)/2 = 90\%$
- 3) The total weight of Solvent Y is multiplied by 90 percent (0.90) when calculating for thresholds.  
 $15,000 \times 0.90 = 13,500$
- 4) Because the total amount of chlorinated hydrocarbons exceeds the 10,000-pound otherwise use threshold, you must file a Form R for this chemical.

**How to Determine if Your Facility Must Submit a Form R or Is Eligible to Use Form A**

Facility Name: \_\_\_\_\_

Date Worksheet Prepared: \_\_\_\_\_

EPCRA Section 313 Chemical or Chemical Category: \_\_\_\_\_

Prepared By: \_\_\_\_\_

CAS Registry Number: \_\_\_\_\_

Reporting Year: \_\_\_\_\_

Amounts of the EPCRA Section 313 chemical or chemical category manufactured, processed, or otherwise used.

Mixture Name or Other Identifier	Information Source	Total Weight (lb)	Percent EPCRA Section 313 Chemical by Weight	EPCRA Section 313 Chemical Weight (lb)	Amount of the EPCRA Section 313 Chemical or Chemical Category by Activity (lb):		
					Manufactured	Processed	Otherwise Used
1.							
2.							
3.							
4.							
<b>Subtotal:</b>					(A) _____ lb	(B) _____ lb	(C) _____ lb

Exempt quantity of the EPCRA Section 313 chemical or chemical category that should be excluded.

Mixture Name as Listed Above	Applicable Exemption (articles, facility, activity)	Fraction or Percent Exempt (if Applicable)	Amount of the EPCRA Section 313 Chemical Exempt from Above (lb):		
			Manufactured	Processed	Otherwise Used
1.					
2.					
3.					
4.					
<b>Subtotal:</b>			(A <sub>i</sub> ) _____ lb	(B <sub>i</sub> ) _____ lb	(C <sub>i</sub> ) _____ lb

Amount subject to threshold: (A-A<sub>i</sub>) \_\_\_\_\_ lb (B-B<sub>i</sub>) \_\_\_\_\_ lb (C-C<sub>i</sub>) \_\_\_\_\_ lb  
 Compare to threshold for EPCRA Section 313 reporting: 25,000 lb 25,000 lb 10,000 lb  
 If any threshold is exceeded, reporting is required for all activities. Do not submit this worksheet with Form R or Form A; retain it for your records.

**Figure 3A. EPCRA Section 313 Non-PBT Chemical Reporting Threshold Worksheet<sup>1</sup>**

<sup>1</sup> Note: Chemicals listed as PBT have separate thresholds (dioxin and dioxin-like compounds chemical category = 0.1 g; highly persistent, highly bioaccumulative toxic chemicals = 10 lb; all other PBT chemicals = 100 lb). Make certain you are using the appropriate worksheet for the toxic chemical of concern.

**How to Determine if Your Facility Must Submit a Form R or Is Eligible to Use Form A**

Facility Name: \_\_\_\_\_

Date Worksheet Prepared: \_\_\_\_\_

EPCRA Section 313 Chemical or Chemical Category: \_\_\_\_\_

Prepared By: \_\_\_\_\_

CAS Registry Number: \_\_\_\_\_

Reporting Year: \_\_\_\_\_

Amounts of the EPCRA Section 313 chemical or chemical category manufactured, processed, or otherwise used.

Mixture Name or Other Identifier	Information Source	Total Weight (lb)	Percent EPCRA Section 313 Chemical by Weight	EPCRA Section 313 Chemical Weight (lb)	Amount of the EPCRA Section 313 Chemical or Chemical Category by Activity (lb):		
					Manufactured	Processed	Otherwise Used
1.							
2.							
3.							
4.							
<b>Subtotal:</b>					(A) _____ lb	(B) _____ lb	(C) _____ lb

Exempt quantity of the EPCRA Section 313 chemical or chemical category that should be excluded.

Mixture Name as Listed Above	Applicable Exemption (articles, facility, activity) <sup>1</sup>	Fraction or Percent Exempt (if Applicable)	Amount of the EPCRA Section 313 Chemical Exempt from Above (lb):		
			Manufactured	Processed	Otherwise Used
1.					
2.					
3.					
4.					
<b>Subtotal:</b>			(A <sub>i</sub> ) _____ lb	(B <sub>i</sub> ) _____ lb	(C <sub>i</sub> ) _____ lb

Amount subject to threshold: (A-A<sub>i</sub>) \_\_\_\_\_ lb (B-B<sub>i</sub>) \_\_\_\_\_ lb (C-C<sub>i</sub>) \_\_\_\_\_ lb  
 Compare to threshold for EPCRA Section 313 reporting. 100 lb 100 lb 100 lb

If any threshold is exceeded, reporting is required for all activities. Do not submit this worksheet with Form R or Form A; retain it for your records.

**Figure 3B. EPCRA Section 313 Reporting Threshold Worksheet for PBT Chemicals with 100 Pound Thresholds**

<sup>1</sup> Note: Chemicals listed as PBT are not eligible for the de minimis exemption.

**How to Determine if Your Facility Must Submit a Form R or Is Eligible to Use Form A**

Facility Name: \_\_\_\_\_

Date Worksheet Prepared: \_\_\_\_\_

EPCRA Section 313 Chemical or Chemical Category: \_\_\_\_\_

Prepared By: \_\_\_\_\_

CAS Registry Number: \_\_\_\_\_

Reporting Year: \_\_\_\_\_

Amounts of the EPCRA Section 313 chemical or chemical category manufactured, processed, or otherwise used.

Mixture Name or Other Identifier	Information Source	Total Weight (lb)	Percent EPCRA Section 313 Chemical by Weight	EPCRA Section 313 Chemical Weight (lb)	Amount of the EPCRA Section 313 Chemical or Chemical Category by Activity (lb):		
					Manufactured	Processed	Otherwise Used
1.							
2.							
3.							
4.							
<b>Subtotal:</b>					(A) _____ lb	(B) _____ lb	(C) _____ lb

Exempt quantity of the EPCRA Section 313 chemical or chemical category that should be excluded.

Mixture Name as Listed Above	Applicable Exemption (articles, facility, activity) <sup>1</sup>	Fraction or Percent Exempt (if Applicable)	Amount of the EPCRA Section 313 Chemical Exempt from Above (lb):		
			Manufactured	Processed	Otherwise Used
1.					
2.					
3.					
4.					
<b>Subtotal:</b>			(A <sub>i</sub> ) _____ lb	(B <sub>i</sub> ) _____ lb	(C <sub>i</sub> ) _____ lb

Amount subject to threshold: (A-A<sub>i</sub>) \_\_\_\_\_ lb (B-B<sub>i</sub>) \_\_\_\_\_ lb (C-C<sub>i</sub>) \_\_\_\_\_ lb  
 Compare to threshold for EPCRA Section 313 reporting. 10 lb 10 lb 10 lb

If any threshold is exceeded, reporting is required for all activities. Do not submit this worksheet with Form R or Form A; retain it for your records.

*Figure 3C. EPCRA Section 313 Reporting Threshold Worksheet for PBT Chemicals with 10 Pound Threshold*

<sup>1</sup> Note: Chemicals listed as PBT are not eligible for the de minimis exemption.

**How to Determine if Your Facility Must Submit a Form R or Is Eligible to Use Form A**

Facility Name: \_\_\_\_\_

Date Worksheet Prepared: \_\_\_\_\_

EPCRA Section 313 Chemical or Chemical Category: Dioxin and Dioxin-like Compounds

Prepared By: \_\_\_\_\_

CAS Registry Number: \_\_\_\_\_

Reporting Year: \_\_\_\_\_

Amounts of the EPCRA Section 313 chemical or chemical category manufactured, processed, or otherwise used.

Mixture Name or Other Identifier	Information Source	Total Weight (g)	Percent EPCRA Section 313 Chemical by Weight	EPCRA Section 313 Chemical Weight (g)	Amount of the EPCRA Section 313 Chemical or Chemical Category by Activity (g):		
					Manufactured	Processed	Otherwise Used
1.							
2.							
3.							
4.							
<b>Subtotal:</b>					(A) _____ g	(B) _____ g	(C) _____ g

Exempt quantity of the EPCRA Section 313 chemical or chemical category that should be excluded.

Mixture Name as Listed Above	Applicable Exemption (articles, facility, activity) <sup>1</sup>	Fraction or Percent Exempt (if Applicable)	Amount of the EPCRA Section 313 Chemical Exempt from Above (g):		
			Manufactured	Processed	Otherwise Used
1.					
2.					
3.					
4.					
<b>Subtotal:</b>			(A <sub>1</sub> ) _____ g	(B <sub>1</sub> ) _____ g	(C <sub>1</sub> ) _____ g

Amount subject to threshold: (A-A<sub>1</sub>) \_\_\_\_\_ g (B-B<sub>1</sub>) \_\_\_\_\_ g (C-C<sub>1</sub>) \_\_\_\_\_ g

Compare to threshold for EPCRA Section 313 reporting. 0.1 g 0.1 g 0.1 g

If any threshold is exceeded, reporting is required for all activities. Do not submit this worksheet with Form R or Form A; retain it for your records.

**Figure 3D. EPCRA Section 313 Reporting Threshold Worksheet for Dioxin and Dioxin-Like Compounds Chemical Category**

<sup>1</sup> Note: Chemicals listed as PBT are not eligible for the de minimis exemption.

## **C. Instructions for Completing TRI Form R**

The following instructions provide information on how to enter data on a Form R (for both filers using TRI-MEweb and trade-secret reporters using paper forms).

TRI-MEweb collects the same facility identification information and chemical specific information that facilities previously submitted on the paper TRI Form Rs. In some cases, TRI-MEweb does not sequentially follow the Sections numerically as listed on the Form R. As such, the TRI-MEweb experience differs somewhat from the sequential nature of the instructions in this document.

Facility identification information provided in Form R Part I is entered only once per facility in TRI-MEweb and is duplicated on all forms submitted, with the exception of technical and public contact which are collected for each form separately (See Part I, Sections 4.3 and 4.4). For facilities that have previously submitted TRI Forms, the facility information remains with the facility's profile and needs to be updated only if facility or parent company changes have occurred.

Chemical specific information on Form R, Part II (including technical and public contact information) is entered separately for each chemical reported.

### ***Part I. Facility Identification Information***

#### **Section 1. Reporting Year**

The reporting year is the calendar year to which the reported information applies, not the year in which you are submitting the report. Information for the 2014 reporting year must be submitted on or before July 1, 2015.

#### **Section 2. Trade Secret Information**

Trade secret submission is not supported by TRI-MEweb. As such, the following sections are not to be completed by TRI-MEweb users. These sections reflect steps performed by trade secret filers only.

##### **2.1 Are you claiming the EPCRA Section 313 chemical identified on Page 2 a trade secret?**

Answer this question only after you have completed the rest of the report. The specific identity of the EPCRA Section 313 chemical being reported in Part II, Section 1 may be designated as a trade secret. If you are making a trade secret claim, mark "yes" and proceed to Section 2.2. Only check "yes" if you manufacture, process, or otherwise use the EPCRA Section 313 chemical whose identity is a trade secret. (See Section A.3 of these instructions for specific information on trade secrecy claims.) If you checked "no," you should submit your non-trade secret form data electronically using TRI-MEweb.

##### **2.2 If "yes" in 2.1, is this copy sanitized or unsanitized?**

Answer this question only after you have completed the rest of the report. Check "sanitized" if this copy of the report is the public version that does not contain the EPCRA Section 313 chemical identity but does contain a generic name that is structurally descriptive in its place, and if you have claimed the EPCRA Section 313 chemical identity trade secret in Part I, Section 2.1. Otherwise, check "unsanitized."

#### **Section 3. Certification**

The certification statement must be signed by a senior official with management responsibility for the person (or persons) completing the form. A senior management official must certify the accuracy and completeness of the information reported on the form.

Electronic certification of completed forms prepared using TRI-MEweb is performed by certifying officials who have signed an Electronic Signature Agreement (ESA) and TRIFID Certification Agreement. For more information regarding certification of forms, see Section A.2.

#### **Section 4. Facility Identification**

##### **4.1 Facility Name, Location, TRI Facility Identification Number and Tribal Country Name**

Enter the full name that the facility presents to the public and its customers in doing business (e.g., the name that appears on invoices, signs, and other official business documents). Do not use a nickname for the facility (e.g., Main Street Plant) unless that is the legal name of the facility under which it does business. Also enter the physical street address,

## *Instructions for Completing TRI Form R*

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mailing address, city, county, three digit BIA code, if applicable, state, and ZIP code in the space provided. The street address provided must be the location where the EPCRA Section 313 chemicals are manufactured, processed, or otherwise used. You may not use PO Box as a facility address. If your mailing address and street address are the same, you should enter NA in the space for the mailing address. If the mailing address is outside of the US, include the FIPS country code, which may be found in Table IV.

If your facility is not in a county, put the name of your city, district (for example, District of Columbia), or parish (if you are in Louisiana) in the county block of the Form R and Form A as well as in the county field of TRI-MEweb. "NA" or "None" are not acceptable entries. TRI-MEweb provides a drop-down menu for the county name, including city districts and parish names.

If your facility is located on Indian country as defined by 18 USC §1151 you must enter the three digit Bureau of Indian Affairs (BIA) tribal code in the "City/County/Tribe/State/ZIP code" field. The BIA tribal codes are listed in Table V of the RFI. Facilities using TRI-MEweb to complete their forms will be asked if they are located within a tribe's Indian country and, upon answering "yes", be taken to a look-up table to determine the correct BIA code.

If your facility is not located (overwhelming majority of TRI facilities are not in Indian Country) in Indian country as defined by 18 USC §1151 you must enter only the city, county (as applicable), state and zip code. Facilities filing a trade secret paper form should leave a blank in the BIA field if the facility is not located within tribal boundaries. Facilities using TRI-MEweb to complete their forms will be required to check a specific checkbox if they are located within tribal lands and if they do not check that checkbox.

### **Location information for a facility that has previously submitted data to EPA.**

If your facility has submitted a Form R in previous reporting years, a TRI Facility Identification Number (TRIFID) has already been assigned to your facility. If you do not know your facility's information used in prior years submissions, contact your Regional TRI Program representative, or

utilize Envirofacts on the Web to look up the address, facility name, or TRIFID at:

<http://www.epa.gov/enviro>.

***Hard copy paper Form R (trade secret submissions only):*** Enter your TRIFID in Part I, Section 4.1.

***TRI-MEweb:*** If you have previously submitted data for your facility using TRI-MEweb, the facility information including TRIFID remains with your profile. If you have not submitted using TRI-MEweb, then you can add your facility to your profile using the 6-digit access key, which is e-mailed to all technical contacts, preparers, and certifying officials at facilities reporting for the prior year, or by submitting the TRIFID and technical contact information.

### **Location information for a facility that has previously submitted data to EPA, but has changed physical location.**

***Hard copy paper Form R (trade secret submissions only):*** If your facility has moved, do not enter your previously assigned TRI Facility Identification Number, enter "New Facility". If you are filing a separate Form R for each establishment at your facility, you should use the same "New Facility" field for each establishment. If you are uncertain if a TRIFID has been assigned to your new facility location, use Envirofacts on the Web to look up the address or facility name at:

<http://www.epa.gov/enviro>.

***TRI-MEweb:*** If your facility has moved, you will need to request that a new TRIFID be assigned to your facility. To request a new TRIFID, add a new facility account to TRI-MEweb and choose to report as a new reporting facility (option 3). TRI-MEweb will automatically generate a new TRIFID for your facility. The TRIFID assigned to your new reporting facility should be used in all future reporting of TRI data.

### **Location information for a facility that has changed ownership, but has not changed physical location.**

The TRI Facility Identification Number (TRIFID) is established by the first Form R submitted by a facility at a particular location. Only a change in address warrants filing as a new facility; otherwise, the TRI Facility Identification Number is retained



## *Instructions for Completing TRI Form R*

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by the facility even if the facility changes name, ownership, production processes, NAICS codes, etc.

***Hard copy paper Form R (trade secret submissions only):*** The TRIFID identification number will always stay with the physical location of a facility. If a new facility unit moves to this location it should use this TRIFID. Establishments of a facility (for facilities that report by part) that report separately should use the TRIFID of the primary facility.

***TRI-MEweb:*** If your facility has changed ownership during the reporting year but not its physical location, the facility does not require a new TRIFID. Use the TRIFID assigned to previous owner. TRI-MEweb can be used to update facility information due to change of ownership.

### **Location reporting TRI releases for the first time to EPA.**

***Hard copy paper Form R (trade secret submissions only):*** If you are preparing a hard copy TRI form for the first time for your facility's location and have never reported to TRI in previous years, you should enter "New Facility" in the space on the hard copy form designated for the TRI Facility Identification number (TRIFID).

***TRI-MEweb:*** If your facility is reporting for the first time, upon creating your CDX account, and adding the TRI-MEweb application, you will be prompted to add a new facility account into TRI-MEweb. TRI-MEweb will automatically generate a new TRIFID for your facility. The TRIFID assigned to your new reporting facility should be used in all future reporting of TRI data.

### **4.2 Full or Partial Facility Indication and Federal Facility Designation**

EPCRA Section 313 requires reports by "facilities," which are defined as "all buildings, equipment, structures, and other stationary items which are located on a single site or on contiguous or adjacent sites and which are owned or operated by the same person (or by any person which controls, is controlled by, or under common control with such person). A facility may contain more than one establishment."

EPCRA Section 313 defines establishment as "an economic unit, generally at a single physical location, where business is conducted or where

services or industrial operations are performed." Under Section 372.30(c) of the reporting rule, you may submit a separate Form R for each establishment or for groups of establishments in your facility, provided all releases and other waste management activities and source reduction activities involving the EPCRA Section 313 chemical from the entire facility are reported. This allows you the option of reporting separately on the activities involving an EPCRA Section 313 chemical at each establishment, or group of establishments (e.g., part of a covered facility), rather than submitting a single Form R for that EPCRA Section 313 chemical for the entire facility. However, if an establishment or group of establishments does not manufacture, process, or otherwise use or release or otherwise manage as waste an EPCRA Section 313 chemical, you do not have to submit a report for that establishment or group of establishments for that particular chemical. (See also Section B.2.b of these instructions.)

In TRI-MEweb, facilities that wish to submit separate Form Rs for each establishment or group of establishments may select "Reporting by Part" with the "Select Facility" page to set up unique establishments within the particular facility. All establishments reporting by part use the same TRIFID but should provide unique facility names. Note that facilities may not submit a Form A Certification statement for establishments reporting by part.

A covered facility must report all releases and other waste management activities and source reduction activities of an EPCRA Section 313 chemical if the facility meets a reporting threshold for that EPCRA Section 313 chemical. Whether submitting a report for the entire facility or separate reports for the establishments, the threshold determination must be made based on the entire facility. Indicate in Section 4.2 whether your report is for the entire covered facility as a whole or for part of a covered facility (i.e., one or more establishments).

In TRI-MEweb, users should select the appropriate button for: 1) federal facility (Section 4.2c), 2) GOCO facility (Section 4.2d), or 3) neither. Federal facilities should select only 'federal facility' even if their TRI reports contain release and other waste management information from contractors located at the facility. Contractors at federal facilities that are required by EPCRA Section 313 to file TRI reports independently of the federal facility, should select

## *Instructions for Completing TRI Form R*

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GOCO. This information is important to prevent duplication of federal facility data. (See Appendix A for further guidance on these instructions.)

### **4.3 Technical Contact**

In TRI-MEweb, facilities must enter the name and telephone number (including area code) of a technical representative whom EPA, state, or tribal officials may contact for clarification of the information reported on Form R. If possible, this number should be for the technical representative rather than a general number for the facility. An email address should also be entered for this person. EPA encourages facilities to provide an email address for the Technical Contact on their TRI submissions because they will be able to receive important program updates and email alerts notifying them when their eFDP has been updated and published for their review. If the technical contact does not have an email address, leave the field blank. This contact person does not have to be the same person who prepares the report or signs the certification statement and does not necessarily need to be someone at the location of the reporting facility. However, this person should be familiar with the details of the report so that he or she can answer questions about the information provided. As facilities may report unique technical contacts for each form, technical contact details are entered in TRI-MEweb with chemical-specific data rather than facility-identification information.

### **4.4 Public Contact**

In TRI-MEweb, facilities must enter the name and telephone number (including area code) of a person who can respond to questions from the public about the form. You should also enter an e-mail address for this person. If the public contact does not have an email address, leave the field blank. If you choose to designate the same person as both the Technical and the Public Contact, or you do not have a Public Contact, you may enter "Same as Section 4.3" in this space. This contact person does not have to be the same person who prepares the form or signs the Certification Statement and does not necessarily need to be someone at the location of the reporting facility. As facilities may report unique public contacts for each form, public contact details are entered in TRI-MEweb with chemical-specific data rather than facility-identification information.

### **4.5 North American Industry Classification System (NAICS) Codes**

Enter the appropriate six-digit North American Industry Classification System (NAICS) Code that is the primary NAICS Code for your facility in Section 4.5(a). Use 2012 NAICS codes for RY 2013 and 2014 reporting and 2007 NAICS codes for RY 2006 – 2012 reporting. Enter any other applicable NAICS for your facility in 4.5 (b)-(f), also called "secondary NAICS codes" in TRI-MEweb. If you do not know your NAICS code(s), consult the 2012 NAICS Manual or check the SIC to NAICS crosswalk tables at:

<http://www.census.gov>.

The North American Industry Classification System (NAICS) is the economic classification system that replaced the 1987 SIC code system. A Federal Register notice was published on June 6, 2006 (71 FR 32464) adopting 2007 NAICS codes for TRI reporting. A direct final rule was published July 18, 2013 (78 FR 42875), adopting 2012 NAICS codes for RY 2013 and subsequent years. Table I lists all industries that are covered under EPCRA 313 and their corresponding 2012 NAICS codes.

### **4.6 Dun & Bradstreet Number(s)**

Enter the nine-digit number assigned by Dun & Bradstreet (D&B) for your facility or each establishment within your facility. These numbers code the facility for financial purposes. This number may be available from your facility's treasurer or financial officer. You can also obtain the numbers from Dun & Bradstreet by calling 1-888-814-1435, or by visiting this website:

[https://www.dnb.com/product/dlw/form\\_cc4.htm](https://www.dnb.com/product/dlw/form_cc4.htm). If a facility does not subscribe to the D&B service, a number can be obtained, toll free at 800 234-3867 (8:00 AM to 6:00 PM, EST) or on the Web at:

<http://www.dnb.com>. If none of your establishments has been assigned a D&B number, you should check "D&B Numbers Not Applicable." If only some of your establishments have been assigned D&B numbers, enter those numbers in Part I, section 4.6.

## **Section 5. Parent Company Information**

You must provide information on your parent company. For TRI Reporting purposes, your parent company is as the highest level company, located in the United States, and that directly owns at least 50 percent of the voting stock of your company. If

## ***Instructions for Completing TRI Form R***

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there is no higher level U.S. company, select the “No U.S. Parent Company parent (for TRI reporting purposes)” check box. Corporate names should be treated as parent company names for companies with multiple facility sites. For example, the Bestchem Corporation is not owned or controlled by any other corporation but has sites throughout the country whose names begin with Bestchem. In this case, Bestchem Corporation should be listed as the parent company. Note that a facility that is a 50:50 joint venture is its own parent company. When a facility is owned by more than one company and none of the facility owners directly owns at least 50 percent of its voting stock, the facility should provide the name of the parent company of either the facility operator or the owner with the largest ownership interest in the facility.

### **5.1 Name of Parent Company**

Enter the name of the corporation or other business entity that is your highest level U.S. parent company. If your facility has no higher level U.S.

company, select the “No U.S. Parent Company (for TRI reporting purposes)” check box.

To improve data quality, TRI standardizes parent company names. TRI-MEweb is preloaded with the standardized parent company names. A full list of parent company names for RY 2014 is available for download at: <http://www2.epa.gov/toxics-release-inventory-tri-program/standardized-parent-company-names-ry-2014-tri-reporting>.

### **5.2 Parent Company’s Dun & Bradstreet Number**

Enter the D&B number for your ultimate U.S. parent company, if applicable. The number may be obtained from the treasurer or financial officer of the company or by calling 1-888-814-1435, or by visiting this website:

[https://www.dnb.com/product/dlw/form\\_cc4.htm](https://www.dnb.com/product/dlw/form_cc4.htm). If your parent company does not have a D&B number, you should check “Parent Company D&B Number Not Applicable.”

## **Part II. Chemical Specific Information**

In Part II, you are to report on:

- The EPCRA Section 313 chemical being reported;
- The general uses and activities involving the EPCRA Section 313 chemical at your facility;
- On-site releases of the EPCRA Section 313 chemical from the facility to air, water, and land;
- Quantities of the EPCRA Section 313 chemical transferred to off-site locations;
- Information for on-site and off-site disposal, treatment, energy recovery, and recycling of the EPCRA Section 313 chemical; and
- Source reduction activities.

In TRI-MEweb, chemical specific information is entered by initiating a blank form for a chemical or chemical category. You may use the “Add New Chemical Forms” search tool to look up chemical and chemical categories by name or Chemical Abstracts Service (CAS) number to begin a new TRI reporting form. Alternately, you may use the Import Data function to create and pre-populate forms based on prior year forms submitted by the facility. TRI-MEweb will prompt users to indicate whether the form should be a TRI Form R or Form A.

The TRI listed chemicals for RY 2014 are listed both alphabetically and by CAS registry number in Table II. Chemical categories are listed separately in Table IIc. TRI-MEweb will not accept forms for chemicals not listed in a particular reporting year. For example, TRI-MEweb will not accept forms for o-nitrotoluene prior to RY 2014 as it was first added for RY 2014. Facilities reporting a generic name provided by a supplier should see instructions in Section 2.

### **Section 1. EPCRA Section 313 Chemical Identity**

#### **1.1 CAS Number**

Initiating a Form R for a chemical or chemical category in TRI-MEweb automatically completes this section.

If you are making a trade secret claim, you must report the CAS number or category code on your unsanitized Form R and unsanitized substantiation form. Enter the CAS registry number exactly as it appears in Table II of these instructions for the chemical being reported. CAS numbers are cross-referenced with an alphabetical list of chemical names in Table II. If you are reporting one of the EPCRA Section 313 chemical categories (e.g., chromium compounds), you should enter the applicable category code in the CAS number space. EPCRA Section 313 chemical category codes are listed below and can also be found in Table IIc.

Do not include the CAS number or category code on your sanitized Form R or sanitized substantiation form.

#### **1.2 EPCRA Section 313 Chemical or Chemical Category Name**

Initiating a Form R for a chemical or chemical category in TRI-MEweb automatically completes this section.

If you are making a trade secret claim, you must report the specific EPCRA Section 313 chemical identity on your unsanitized Form R and unsanitized substantiation form. Enter the name of the EPCRA Section 313 chemical or chemical category exactly as it appears in Table II. If the EPCRA Section 313 chemical name is followed by a synonym in parentheses, report the chemical by the name that directly follows the CAS number (i.e., not the synonym). If the EPCRA Section 313 chemical identity is actually a product trade name (e.g., Dicofol), the *Chemical Abstracts 9th Collective Index* name is listed below it in brackets. You may report either name in this case.

**Do not** list the name of a chemical that does not appear in Table II, such as individual members of an EPCRA Section 313 chemical category. For example, if you use silver chloride, **do not** report silver chloride with its CAS number. Report this chemical as “silver compounds” with its category code, N740.

Do not report the name of the EPCRA Section 313 chemical on your sanitized Form R or sanitized substantiation form. Include a generic name that is structurally descriptive in Part II, Section 1.3 of your sanitized Form R report.

## ***Instructions for Completing Part II of EPA Form R***

EPA requests that the EPCRA Section 313 chemical, chemical category, or generic name also be placed in the box marked “Toxic Chemical, Category, or Generic Name” in the upper right-hand corner on all pages of Form R. While this space is not a required data element, providing this information will help you in preparing a complete Form R report.

### **1.3 Generic Chemical Name**

Complete Section 1.3 only if you are claiming the specific EPCRA Section 313 chemical identity of the EPCRA Section 313 chemical as a trade secret and have marked the trade secret block in Part I, Section 2.1 on Page 1 of Form R. Enter a generic chemical name that is descriptive of the chemical structure. You should limit the generic name to 70 characters (e.g., numbers, letters, spaces, punctuation) or less. Do not enter mixture names in Section 1.3; see Section 2 below.

In-house plant codes and other substitute names that are not structurally descriptive of the EPCRA Section 313 chemical identity being withheld as a trade secret are not acceptable as a generic name. The generic name must appear on both sanitized and unsanitized Form Rs, and the name must be the same as that used on your substantiation forms.

## **Section 2. Mixture Component Identity**

Complete this section only if you are reporting for an EPCRA 313 chemical whose identity has been withheld by the chemical supplier. You do not need to supply trade secret substantiation forms for this EPCRA Section 313 chemical because it is your supplier who is claiming the chemical identity a trade secret.

### **2.1 Generic Chemical Name Provided by Supplier**

Enter the generic chemical name in this section only if the following three conditions apply:

1.) You determine that the mixture contains an EPCRA Section 313 chemical but the only identity you have for that chemical is a generic name;

2.) You know either the specific concentration of that EPCRA Section 313 chemical

component or a maximum or average concentration level; and

3.) You multiply the concentration level by the total annual amount of the whole mixture processed or otherwise used and determine that you meet the process or otherwise use threshold for that single, generically identified mixture component.

To begin a TRI Form R for a generic chemical in TRI-MEweb, click the “**create a form for a Generic Chemical Name Provided by Supplier**” link from the “Add New Chemical Forms” search page, then enter generic chemical name. The generic chemical name may not be that of a listed TRI chemical or chemical category and must be less than 70 characters in length. Facilities may also use the Import Data tool to set up a reporting form for a generic chemical reported in prior years.

#### **Example 10: Mixture Containing Unidentified EPCRA Section 313 Chemical**

Your facility uses 20,000 pounds of a solvent that your supplier has told you contains 80 percent “chlorinated aromatic,” their generic name for a non-PBT chemical subject to reporting under EPCRA Section 313. You, therefore, have used 16,000 pounds of some EPCRA Section 313 chemical and that exceeds the “otherwise use” threshold for a non-PBT chemical. You would file a Form R and enter the name “chlorinated aromatic” as the generic chemical name.

## **Section 3. Activities and Uses of the EPCRA Section 313 Chemical at the Facility**

Indicate whether the EPCRA Section 313 chemical is manufactured (including imported), processed, or otherwise used at the facility and the general nature of such activities and uses at the facility during the calendar year (see Figure 4). You are not required to report on Form R the quantity manufactured, processed or otherwise used. Report activities that take place only at your facility, not activities that take place at other facilities involving your products. You must check all the boxes in this section that apply. Refer to the definitions of “manufacture,” “process,” and “otherwise use” in Section B.3.a or Part 40, Section 372.3 of the CFR for additional explanations.

## Instructions for Completing Part II of EPA Form R

### 3.1 Manufacture the EPCRA Section 313 Chemical

Persons who manufacture (including import) the EPCRA Section 313 chemical must check at least one of the following:

- a. **Produce** — The EPCRA Section 313 chemical is produced at the facility.
- b. **Import** — The EPCRA Section 313 chemical is imported by the facility into the Customs Territory of the United States. (See Section B.3.a of these instructions for further clarification of import.)

And check at least one of the following:

- c. **For on-site use/processing** — The EPCRA Section 313 chemical is produced or imported and then further processed or otherwise used at the same facility. If you check this block, generally you should also check at least one item in Part II, Section 3.2 or 3.3.
- d. **For sale/distribution** — The EPCRA Section 313 chemical is produced or imported specifically for sale or distribution outside the manufacturing facility.
- e. **As a byproduct** — The EPCRA Section 313 chemical is produced coincidentally during the manufacture, processing, or otherwise use of another chemical substance or mixture and, following its production, is separated from that other chemical substance or mixture. EPCRA Section 313 chemicals produced as a result of waste management are also considered byproducts.
- f. **As an impurity** — The EPCRA Section 313 chemical is produced coincidentally as a result of the manufacture, processing, or otherwise use of another chemical but is not separated and remains in the mixture or other trade name product with that other chemical.

In summary, if you are a manufacturer of the EPCRA Section 313 chemical, you must check (a) and/or (b), and at least one of (c), (d), (e), and (f) in Section 3.1.

### 3.2 Process the EPCRA Section 313 Chemical

Persons who process the EPCRA Section 313 chemical must check at least one of the following:

- a. **As a reactant** — A natural or synthetic EPCRA Section 313 chemical is used in chemical reactions for the manufacture of another chemical substance or of a product. Includes but is not limited to, feedstocks, raw materials, intermediates, and initiators.
- b. **As a formulation component** — An EPCRA Section 313 chemical is added to a product (or product mixture) prior to further distribution of the product that acts as a performance enhancer during use of the product. Examples of EPCRA Section 313 chemicals used in this capacity include, but are not limited to, additives, dyes, reaction diluents, initiators, solvents, inhibitors, emulsifiers, surfactants, lubricants, flame retardants, and rheological modifiers.
- c. **As an article component** — An EPCRA Section 313 chemical becomes an integral component of an article distributed for industrial, trade, or consumer use. One example is the pigment components of paint applied to a chair that is sold.
- d. **Repackaging** — This consists of processing or preparation of an EPCRA Section 313 chemical (or product mixture) for distribution in commerce in a different form, state, or quantity. This includes, but is not limited to, the transfer of material from a bulk container, such as a tank truck to smaller containers such as cans or bottles.
- e. **As an impurity** — The EPCRA Section 313 chemical is processed but is not separated and remains in the mixture or other trade name product with that/those other chemical(s).

### 3.3 Otherwise Use the EPCRA Section 313 Chemical (non-incorporative activities)

Persons who otherwise use the EPCRA Section 313 chemical must check at least one of the following:

- a. **As a chemical processing aid** — An EPCRA Section 313 chemical that is added to a reaction mixture to aid in the manufacture or synthesis of another chemical substance but is not intended to remain in or become part of the product or product mixture is otherwise used as chemical processing aid. Examples of such EPCRA Section 313 chemicals include, but are not limited to, process solvents, catalysts,

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- inhibitors, initiators, reaction terminators, and solution buffers.
- b. **As a manufacturing aid** — An EPCRA Section 313 chemical that aids the manufacturing process but does not become part of the resulting product and is not added to the reaction mixture during the manufacture or synthesis of another chemical substance is otherwise used as a manufacturing aid. Examples include, but are not limited to, process lubricants, metalworking fluids, coolants, refrigerants, and hydraulic fluids.
- c. **Ancillary or other use** — An EPCRA Section 313 chemical that is used at a facility for purposes other than aiding chemical processing or manufacturing as described above is otherwise used as an ancillary or other use. Examples include, but are not limited to, cleaners, degreasers, lubricants, fuels, EPCRA Section 313 chemicals used for treating wastes, and EPCRA Section 313 chemicals used to treat water at the facility.

<b>SECTION 1. TOXIC CHEMICAL IDENTITY</b> (Important: DO NOT complete this section if you are reporting a mixture component in Section 2 below.)		
1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) 334-88-3	
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) Diazomethane	
1.3	Generic Chemical Name (Important: Complete only if Part I, Section 2.1 is checked "Yes". Generic Name must be structurally descriptive.) 	
<b>SECTION 2. MIXTURE COMPONENT IDENTITY</b> (Important: DO NOT complete this section if you completed Section 1.)		
2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.) 	
<b>SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY</b> (Important: Check all that apply.)		
3.1	3.2	3.3
Manufacture the toxic chemical: a. <input checked="" type="checkbox"/> Produce    b. <input type="checkbox"/> Import  If Produce or Import c. <input checked="" type="checkbox"/> For on-site use/processing d. <input checked="" type="checkbox"/> For sale/distribution e. <input type="checkbox"/> As a byproduct f. <input type="checkbox"/> As an impurity	Process the toxic chemical: a. <input checked="" type="checkbox"/> As a reactant b. <input type="checkbox"/> As a formulation component c. <input type="checkbox"/> As an article component d. <input type="checkbox"/> Repackaging e. <input type="checkbox"/> As an impurity	Otherwise use the toxic chemical: a. <input type="checkbox"/> As a chemical processing aid b. <input type="checkbox"/> As a manufacturing aid c. <input type="checkbox"/> Ancillary or other use

**Figure 4. Reporting EPCRA Section 313 Chemicals**

**Section 4. Maximum Amount of the EPCRA Section 313 Chemical On-site at Any Time during the Calendar Year**

For data element 4.1 of Part II, select the code (see codes below) that indicates the maximum quantity of the EPCRA Section 313 chemical (e.g., in storage tanks, process vessels, on-site shipping containers, or in wastes generated) at your facility at any time during the calendar year. If the EPCRA Section 313 chemical was present at several locations within your facility, use the maximum total amount present at the entire facility at any one time. While range reporting is not allowed for PBT chemicals elsewhere on the Form R, range reporting for PBT chemicals is allowed for the Maximum Amount On-site.

**Example 11: Manufacturing and Processing Activities of EPCRA Section 313 Chemicals**

In the two examples below, it is assumed that the threshold quantities for manufacture, process, or otherwise use (25,000 pounds, 25,000 pounds, and 10,000 pounds, respectively for non-PBT chemicals; 100 pounds for certain PBT chemicals; 10 pounds for highly persistent, highly bioaccumulative toxic chemicals; and 0.1 grams for the PBT chemical category comprised of dioxin and dioxin-like compounds) have been exceeded and the reporting of EPCRA Section 313 chemicals is therefore required.

1. Your facility manufactures diazomethane. Fifty percent is sold as a product, thus it is processed. The remaining fifty percent is reacted with alpha-naphthylamine, forming N-methyl-alpha-naphthylamine and also producing nitrogen gas.

- Your company manufactures diazomethane, an EPCRA Section 313 chemical, both for sale/ distribution as a commercial product and for on-site use/processing as a feedstock in the N-methyl-alpha-naphthylamine production process. Because the diazomethane is a reactant, it is also processed. See Figure 4 for how this information would be reported in Part II, Section 3 of Form R.
- Your facility also processes alpha-naphthylamine, as a reactant to produce N-methyl-alpha-naphthylamine, a chemical not on the EPCRA Section 313 list.

2. Your facility is a commercial distributor of Missouri bituminous coal, which contains mercury at 1.5 ppm (w:w). You should check the box on Part II, Section 3.2.e for processing mercury as an impurity.



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### Weight Range in Pounds

Range Code	From	To
01	0	99
02	100	999
03	1,000	9,999
04	10,000	99,999
05	100,000	999,999
06	1,000,000	9,999,999
07	10,000,000	49,999,999
08	50,000,000	99,999,999
09	100,000,000	499,999,999
10	500,000,000	999,999,999
11	1 billion	more than 1 billion

If the EPCRA Section 313 chemical present at your facility was part of a mixture or other trade name product, determine the maximum quantity of the EPCRA Section 313 chemical present at the facility by calculating the weight percent of the EPCRA Section 313 chemical only.

Do not include the weight of the entire mixture or other trade name product. These data may be found in the Tier II form your facility may have prepared under Section 312 of EPCRA. See Part 40, Section 372.30(b) of the CFR for further information on how to calculate the weight of the EPCRA Section 313 chemical in the mixture or other trade name product. For EPCRA Section 313 chemical categories (e.g., nickel compounds), include all chemical compounds in the category when calculating the maximum amount, using the entire weight of each compound.

### Weight Range in Grams (Dioxin and Dioxin-like Compounds)

When reporting for the dioxin and dioxin-like compounds category use the following gram quantity range codes:

Range Code	From	To
12	0	0.099
13	0.1	0.99
14	1.0	9.99
15	10	99
16	100	999
17	1,000	9,999
18	10,000	99,999
19	100,000	999,999
20	1,000,000	more than 1 million

### Section 5. Quantity of the Toxic Chemical Entering Each Environmental Medium On-site

In Section 5, you must account for the total aggregate on-site releases of the EPCRA Section 313 chemical to the environment from your facility for the calendar year.

On-site releases to the environment include emissions to the air, discharges to surface waters, and releases to land (including underground injection wells).

For all toxic chemicals (except the dioxin and dioxin-like compound category), do not enter the values in Section 5 in gallons, tons, liters, or any measure other than pounds. You must also enter the values as whole numbers (do not use scientific notation). Numbers following a decimal point are not acceptable for toxic chemicals other than those designated as PBT chemicals. For PBT chemicals, facilities should report release and other waste management quantities greater than 0.1 pound (except the dioxin and dioxin-like compounds category), provided the accuracy and the underlying data on which the estimate is based supports this level of precision.

For the dioxin and dioxin-like compounds category, facilities should report at a level of precision supported by the accuracy of the underlying data and the estimation techniques on which the estimate is based. For the dioxin and dioxin like compounds chemical category, which has a reporting threshold of 0.1 gram, facilities need only report all release and other waste management quantities greater than 100 micrograms (i.e., 0.0001 grams). (See Example 12) Notwithstanding the numeric precision used when determining reporting eligibility thresholds, facilities should report on Form R to the level of accuracy that their data supports, up to seven digits to the right of the decimal. EPA's reporting software and data management systems support data precision up to seven digits to the right of the decimal.

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### Example 12: Reporting Dioxins and Dioxin-Like Compounds

If the total quantity for Section 5.2 of the Form R (i.e., stack or point air emissions) is 0.00005 grams or less, then zero can be entered. If the total quantity is between 0.00005 and 0.0001 grams, then 0.0001 grams can be entered or the actual number can be entered (e.g., 0.000075).

**NA vs. a Numeric Value (e.g., Zero).** Generally, NA is applicable if the waste stream that contains or contained the EPCRA Section 313 chemical is not directed to the relevant environmental medium, or if leaks, spills and fugitive emissions cannot occur. If the waste stream that contains or contained the EPCRA Section 313 chemical is directed to the environmental medium, or if leaks, spills or fugitive emissions can occur, NA should not be used, even if treatment or emission controls result in a release of zero. If the annual aggregate release of that chemical was equal to or less than 0.5 pound, the value reported is zero (unless the chemical is a listed PBT chemical).

For Section 5.1, NA generally is not applicable for volatile organic compounds (VOCs). For Section 5.5.4, NA generally would not be applicable, recognizing the possibility of accidental spills or leaks of the EPCRA Section 313 chemical.

An example that illustrates the use of NA vs. a numeric value (e.g., zero) would be nitric acid involved in a facility's processing activities. If the facility neutralizes the wastes containing nitric acid to a pH of 6 or above, then the facility reports a release of zero for the EPCRA Section 313 chemical, not NA. Another example is when the facility has no underground injection well, in which case NA should be checked in Part II, Section 5.4.1 and 5.4.2 of Form R. Also, if the facility does not landfill the acidic waste, NA should be checked in Part II, Section 5.5.1.B of Form R.

All releases of the EPCRA Section 313 chemical to the air must be classified as either stack or fugitive emissions, and included in the total quantity reported for these releases in Sections 5.1 and 5.2. Instructions for columns A, B, and C follow the discussions of Sections 5.1 through 5.5.

### 5.1 Fugitive or Non-Point Air Emissions

Report the total of all releases of the EPCRA Section 313 chemical to the air that are not released through stacks, vents, ducts, pipes, or any other confined air stream. You must include (1) fugitive equipment leaks from valves, pump seals, flanges, compressors, sampling connections, open-ended lines, etc.; (2) evaporative losses from surface impoundments and spills; (3) releases from building ventilation systems; and (4) any other fugitive or non-point air emissions. Engineering estimates and mass balance calculations (using purchase records, inventories, engineering knowledge or process specifications of the quantity of the EPCRA Section 313 chemical entering product, hazardous waste manifests, or monitoring records) may be useful in estimating fugitive emissions. You should check the NA box in Section 5.1 if you do not engage in activities that result in fugitive or non-point air emissions of this listed toxic chemical. For VOCs, NA generally would not be applicable.

### 5.2 Stack or Point Air Emissions

Report the total of all releases of the EPCRA Section 313 chemical to the air that occur through stacks, confined vents, ducts, pipes, or other confined air streams. You must include storage tank emissions. Air releases from air pollution control equipment would generally fall in this category. Monitoring data, engineering estimates, and mass balance calculations may help you to complete this section. You should check the NA box in Section 5.2 if there are no stack air activities involving the waste stream that contains or contained the EPCRA Section 313 chemical.

### 5.3 Discharges to Receiving Streams or Water Bodies

In Section 5.3 you are to enter all the names of the streams or water bodies to which your facility directly discharges the EPCRA Section 313 chemical on which you are reporting. Facilities may enter releases to as many unique receiving streams or water bodies as needed in TRI-MEweb. In addition, you may also enter the 14-digit reach code, which is a unique code that identifies a continuous piece of surface water with similar hydrologic characteristics, assigned to each receiving water body by the United States Geographical Society's (USGS) National Hydrography Dataset (NHD). Note that reach data are not available for Alaska,

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Guam, American Samoa and the Northern Mariana Islands, so facilities located in these areas should leave this field blank.

EPA maps all reported discharges to reaches for purposes of its Risk Screening Environmental Indicators (RSEI) model, Discharge Monitoring Reports (DMR) Pollutant Loading Tool, and for other analyses. Identifying your stream or water body by entering a reach code in this section ensures that EPA will map your discharges to the correct reach.

In TRI-MEweb, facilities have the option of using an interactive map interface to locate and identify the receiving stream or water body to which the chemical was released. TRI-MEweb will automatically populate the appropriate reach code field when you select your receiving water body on the map provided in the user interface for this section.

The name of the receiving stream or water body and reach code may be manually entered by following the “Can't find or identify your stream or water body on the map?” link. In such a case, you should report the name of the receiving stream or water body and reach code as it appears on a discharge permit or other appropriate documentation. If the stream is not included in the NPDES permit or its name is not identified in the NPDES permit, enter the name of the off-site stream or water body by which it is publicly known or enter the first publicly named water body to which the receiving waters are a tributary, if the receiving waters are unnamed. Do not list a series of streams through which the EPCRA Section 313 chemical flows. Be sure to include all the receiving streams or water bodies that receive stormwater runoff from your facility. Do not enter names of streams to which off-site treatment plants discharge.

You should check the NA box in Section 5.3 if there are no discharges to receiving streams or water bodies of the waste stream that contains or contained the EPCRA Section 313 chemical (See discussion of NA vs. a Numeric Value (e.g., Zero) in the introduction of Section 5).

For each unique stream or water body, enter the total annual amount of the EPCRA Section 313 chemical released from all discharge points at the facility to each receiving stream or water body. Include process outfalls such as pipes and open

trenches, releases from on-site wastewater treatment systems, and the contribution from stormwater runoff, if applicable (see instructions for column C below). Do not include discharges to a POTW or other off-site wastewater treatment facilities in this section. These off-site transfers must be reported in Part II, Section 6 of Form R. Wastewater analyses and flowmeter data may provide the quantities you will need to complete this section.

Discharges of listed acids (e.g., hydrogen fluoride, nitric acid) may be reported as zero if the discharges have been neutralized to pH 6 or above. If wastewater containing a listed acid is discharged below pH 6, then releases of the acid must be reported. In this case, pH measurements may be used to estimate the amount of mineral acid released.

If you are making a trade secret claim and reporting on hard copy, enter the receiving stream(s) and water body or bodies in Column A. A total of three spaces is provided on Page 2 of Form R. If you discharge the EPCRA Section 313 chemical to more than three streams or water bodies, you should photocopy Page 2 of Form R as many times as necessary and then number the boxes consecutively for each stream or water body. At the bottom of Page 2 you will find instructions for indicating the total number of Page 2s that you are submitting as part of the Form R as well as indicating the sequence of those pages.

### **5.4-5.5 Disposal to Land On-site**

Eight predefined subcategories for reporting quantities released to land within the boundaries of the facility (including underground injection) are provided. Do not report land disposal at off-site locations in this section. Consulting accident histories and spill records may be useful when preparing this section (e.g., release notification reports required under Section 304 of EPCRA, Section 103 of CERCLA, and accident histories required under Section 112(r)(7)(B)(ii) of the Clean Air Act). Where relevant, you should check the NA box in sections 5.4.1 through 5.5.3 if there are no disposal activities for the waste stream that contains or contained the EPCRA Section 313 chemical (See discussion of NA vs. a Numeric Value (e.g., Zero) in the introduction of Section 5). For 5.5.4, facilities generally should report zero, recognizing the potential for spills or leaks.

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### ***5.4.1 Class I Underground Injection Wells***

Enter the total amount of the EPCRA Section 313 chemical that was injected into Class I wells at the facility. Chemical analyses, injection rate meters, and RCRA Hazardous Waste Generator Reports are good sources for obtaining data that will be useful in completing this section. You should check the NA box in Section 5.4.1 if you do not inject the waste stream that contains or contained the EPCRA Section 313 chemical into Class I underground wells (See discussion of NA vs. a Numeric Value (e.g., Zero) in the introduction of Section 5).

### ***5.4.2 Class II-V Underground Injection Wells***

Enter the total amount of the EPCRA Section 313 chemical that was injected into wells at the facility other than Class I wells. Chemical analyses and injection rate meters are good sources for obtaining data that will be useful in completing this section. You should check the NA box in Section 5.4.2 if you do not inject the waste stream that contains or contained the EPCRA Section 313 chemical into Class II-V underground wells (See discussion of NA vs. a Numeric Value (e.g., Zero) in the introduction of Section 5).

#### ***5.5.1A RCRA Subtitle C Landfills***

Enter the total amount of the EPCRA Section 313 chemical that was placed in RCRA Subtitle C landfills. EPA has not required facilities to estimate leaks from landfills because the amount of the EPCRA Section 313 chemical has already been reported as a release.

#### ***5.5.1B Other Landfills***

Enter the total amount of the EPCRA Section 313 chemical that was placed in landfills other than RCRA Subtitle C landfills. EPA has not required facilities to estimate leaks from landfills because the amount of the EPCRA Section 313 chemical has already been reported as a release.

### ***5.5.2 Land Treatment/Application Farming***

Land treatment is a disposal method in which a waste containing an EPCRA Section 313 chemical is applied onto or incorporated into soil. While this disposal method is considered a release to land, any volatilization of EPCRA Section 313 chemicals into the air occurring during the disposal operation must not be included in this section but must be included in the total fugitive air releases reported in Part II, Section 5.1 of Form R.

### ***5.5.3 Surface Impoundments***

A surface impoundment is a natural topographic depression, man-made excavation, or diked area formed primarily of earthen materials (although some may be lined with man-made materials), that is designed to hold an accumulation of liquid wastes or wastes containing free liquids. Examples of surface impoundments are holding, settling, storage, and elevation pits; ponds, and lagoons. If the pit, pond, or lagoon is intended for storage or holding without discharge, it would be considered to be a surface impoundment used as a final disposal method. A facility must determine, to the best of its ability, the percentage of a volatile chemical, e.g., benzene, that is in waste sent to a surface impoundment that evaporates during the reporting year. The facility must report this as a fugitive air emission in section 5.1. The balance should be reported in either section 5.5.3A or 5.5.3B.

Quantities of the EPCRA Section 313 chemical released to surface impoundments that are used merely as part of a wastewater treatment process generally should not be reported in this section. However, if an impoundment accumulates sludges containing the EPCRA Section 313 chemical, you must include an estimate in this section unless the sludges are removed and otherwise disposed of (in which case they must be reported under the appropriate section of the form). For the purposes of this reporting, storage tanks are not considered to be a type of disposal and are not to be reported in this section of Form R.

#### ***5.5.3A RCRA Subtitle C Surface Impoundments***

Enter the total amount of the EPCRA Section 313 chemical that was placed in RCRA Subtitle C surface impoundments.

#### ***5.5.3B Other Surface Impoundments***

Enter the total amount of the EPCRA Section 313 chemical that was placed in surface impoundments other than RCRA Subtitle C surface impoundments.

### ***5.5.4 Other Disposal***

Includes any amount of an EPCRA Section 313 chemical released to land that does not fit the categories of landfills, land treatment, or surface impoundment. This other disposal would include any spills or leaks of EPCRA Section 313 chemicals to land. For example, 2,000 pounds of benzene leaks from an underground pipeline into the land at a facility. Because the pipe was only a few feet from the surface at the erupt point, 30 percent of the

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benzene evaporates into the air. The 600 pounds released to the air would be reported as a fugitive air release (Part II, Section 5.1) and the remaining 1,400 pounds would be reported as a release to land, other disposal (Part II, Section 5.5.4).

### **Section 5 Column A: Total Release**

Only on-site releases of the EPCRA Section 313 chemical to the environment for the calendar year are to be reported in this section of Form R. The total on-site releases from your facility do not include transfers or shipments of the EPCRA Section 313 chemical from your facility for sale or distribution in commerce, or of wastes to other facilities for disposal, treatment, energy recovery, or recycling (see Part II, Section 6 of these Instructions). Both routine releases, such as fugitive air emissions, and accidental or non-routine releases, such as chemical spills, must be included in your estimate of the quantity released.

**Releases of Less Than 1,000 Pounds.** For total annual releases or off-site transfers of an EPCRA Section 313 chemical from the facility of less than 1,000 pounds, the amount may be reported either as an estimate or by using the range codes that have been developed (range reporting in section 5 does not apply to PBT chemicals). Do not enter a range code and an estimate in the same box in column A.

The reporting range codes to be used are:

Code	Range (pounds)
A	1-10
B	11-499
C	500-999

Total annual on-site releases of an EPCRA Section 313 chemical from the facility of less than 1 pound may be reported in one of several ways. You should round the value to the nearest pound. If the estimate is greater than 0.5 pound, you should either enter the range code "A" for "1-10" or enter "1" in column A. If the release is equal to or less than 0.5 pounds, you may round to zero and enter "0" in column A.

Note that total annual releases of 0.5 pound or less from the processing or otherwise use of an article maintain the article status of that item. Thus, if the only releases you have are from processing an article, and such releases are equal to or less than 0.5 pound per year, you are not required to submit a report for that EPCRA Section 313 chemical. The

0.5-pound release determination does not apply to just a single article. It applies to the cumulative releases from the processing or otherwise use of the same type of article (e.g., sheet metal or plastic film) that occurs over the course of the reporting year.

If you enter a range code in column A, some TRI data tools used by the public will display the midpoint of the range (i.e., 5, 250, or 750 lb).

**Releases of 1,000 Pounds or More.** For releases to any medium that amount to 1,000 pounds or more for the year, you must provide an estimate in pounds per year in column A.

**Data Precision.** Generally, estimates provided need not be reported to more than two significant figures. This estimate should be in whole numbers. However, facilities should report releases and other waste management amounts at a level of precision supported by the accuracy of the underlying data and the estimation techniques on which the estimate is based. If a facility's release or other management calculations support reporting an amount that is more precise than two significant digits, then the facility should report that more precise amount.

**Calculating On-Site Releases.** To provide the release information in column A, EPCRA Section 313(g) (2) requires a facility to use readily available data (including monitoring data) collected pursuant to other provisions of law, or, where such data are not readily available, "reasonable estimates" of the amounts involved. If available data (including monitoring data) are known to be non-representative, facilities must make reasonable estimates using the best readily available information.

Reasonable estimates of the amounts released should be made using published emission factors, material balance calculations, or engineering calculations. You may not use emission factors or calculations to estimate releases if more accurate data are available.

No additional monitoring or measurement of the quantities or concentrations of any EPCRA Section 313 chemical released into the environment, or of the frequency of such releases, beyond that required under other provisions of law or regulation or as part of routine plant operations, is required for the purpose of completing Form R.

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You must estimate the quantity (in pounds) of the EPCRA Section 313 chemical or chemical category that is released annually to each environmental medium on-site. Include only the quantity of the EPCRA Section 313 chemical in this estimate. If the EPCRA Section 313 chemical present at your facility was part of a mixture or other trade name product, calculate only the releases of the EPCRA Section 313 chemical, not the other components of the mixture or other trade name product. If you are only able to estimate the releases of the mixture or other trade name product as a whole, you should assume that the release of the EPCRA Section 313 chemical is proportional to its concentration in the mixture or other trade name product. See Part 40, Section 372.30(b) of the CFR for further information on how to calculate the concentration and weight of the EPCRA Section 313 chemical in the mixture or other trade name product.

If you are reporting an EPCRA Section 313 chemical category listed in Table II of these instructions rather than a specific EPCRA Section 313 chemical, you must combine the release data for all chemicals in the EPCRA Section 313 chemical category (e.g., all listed members of certain glycol ethers or all listed members of chlorophenols) and report the aggregate amount for that EPCRA Section 313 chemical in that category separately. For example, if your facility releases 3,000 pounds per year of 2-chlorophenol, 4,000 pounds per year of 3-chlorophenol, and 4,000 pounds per year of 4-chlorophenol to air as fugitive emissions, you must report that your facility releases 11,000 pounds per year of chlorophenols to air as fugitive emissions in Part II, Section 5.1.

For aqueous ammonia solutions, releases must be reported based on 10 percent of total aqueous ammonia. Ammonia evaporating from aqueous ammonia solutions is considered to be anhydrous ammonia; therefore, 100 percent of the anhydrous ammonia should be reported if it is released to the environment.

For dissociable nitrate compounds, release estimates should be based on the weight of the nitrate only.

For metal category compounds (e.g., chromium compounds), report releases of only the parent metal. For example, a user of various inorganic chromium salts would report the total chromium released regardless of the chemical compound and

exclude any contribution to mass made by the other portion of the compound.

### **Section 5 Column B: Basis of Estimate**

For each release and otherwise managed waste estimate (Sections 5 & 6), you are required to indicate the principal method used to determine the amount of release and otherwise managed waste reported. You should enter a letter code identifying the method that applies to the largest portion of the total estimated release and otherwise managed waste quantity.

The codes are as follows:

- M1 Estimate is based on continuous monitoring data or measurements for the EPCRA Section 313 chemical.
- M2 Estimate is based on periodic or random monitoring data or measurements for the EPCRA Section 313 chemical.
- C Estimate is based on mass balance calculations, such as calculation of the amount of the EPCRA Section 313 chemical in streams entering and leaving process equipment.
- E1 Estimate is based on published emission factors, such as those relating release quantity to through-put or equipment type (e.g., air emission factors).
- E2 Estimate is based on-site specific emission factors, such as those relating release quantity to through-put or equipment type (e.g., air emission factors).
- O Estimate is based on other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgment. This would include applying estimated removal efficiency to a waste stream, even if the composition of the stream before treatment was fully identified through monitoring data.

For example, if 40 percent of stack emissions of the reported EPCRA Section 313 chemical were derived using source testing data, 30 percent by mass balance, and 30 percent by published chemical-specific emission factors, you should enter the code letter "M2" for periodic or random emission monitoring.

If the monitoring data, mass balance, or emission factor used to estimate the release is not specific to

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the EPCRA Section 313 chemical being reported, the form should identify the estimate based on other methods of estimation (O).

If a mass balance calculation yields the flow rate of a waste, but the quantity of reported EPCRA Section 313 chemical in the waste is based on solubility data, you should report "O" because engineering calculations were used as the basis of estimate of the quantity of the EPCRA Section 313 chemical in the waste.

If the concentration of the EPCRA Section 313 chemical in the waste was measured by continuous emissions monitoring equipment and the flow rate of the waste was determined by mass balance, then the primary basis of the estimate should be "continuous emission monitoring" (M1). Even though a mass balance calculation also contributed to the estimate, "continuous emission monitoring" should be indicated because monitoring data were used to estimate the concentration of the chemical in waste.

Mass balance (C) should only be indicated if it is directly used to calculate the mass (weight) of EPCRA Section 313 chemical released. Monitoring data should be indicated as the basis of estimate only if the EPCRA Section 313 chemical concentration is measured in the waste. Monitoring data should not be indicated, for example, if the monitoring data relate to a concentration of the EPCRA Section 313 chemical in other process streams within the facility.

It is important to realize that the accuracy and proficiency of release estimation will improve over time. However, submitters are not required to use new emission factors or estimation techniques to revise previous Form R submissions.

### **Section 5 Column C: Percent from Stormwater**

This column relates only to Section 5.3 - discharges to receiving streams or water bodies. If your facility

has monitoring data on the amount of the EPCRA Section 313 chemical in stormwater runoff (including unchanneled runoff), you must include that quantity of the EPCRA Section 313 chemical in your water release in column A and indicate the percentage of the total quantity (by weight) of the EPCRA Section 313 chemical contributed by stormwater in column C (Section 5.3C).

If your facility has monitoring data on the EPCRA Section 313 chemical and an estimate of flow rate, you must use these data to determine the percent stormwater.

If you have monitored stormwater but did not detect the EPCRA Section 313 chemical, enter zero in column C. If your facility has no stormwater monitoring data for the chemical, you should check the NA box.

If your facility does not have periodic measurements of stormwater releases of the EPCRA Section 313 chemical, but has submitted chemical-specific monitoring data in permit applications, then these data must be used to calculate the percent contribution from stormwater. One way to calculate the flow rates from stormwater runoff is the Rational Method. In this method, flow rates,  $Q$ , can be estimated by multiplying the land area of the facility,  $A$ , by the runoff coefficient,  $C$ , and then multiplying that figure by the annual rainfall intensity,  $I$  (i.e.,  $Q = A \times C \times I$ ). The rainfall intensity,  $I$ , is specific to the geographical area of the country where the facility is located, and may be obtained from most standard engineering manuals for hydrology. The flow rate,  $Q$ , will have volumetric dimensions per unit time, and will have to be converted to units of pounds per year. The runoff coefficient represents the fraction of rainfall that does not seep into the ground but runs off as stormwater. The runoff coefficient is directly related to how the land in the drainage area is used. (See table on the next page)

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Description of Land Area	Runoff Coefficient	Description of Land Area	Runoff Coefficient
Business		Brick	0.70-0.85
Downtown areas	0.70-0.95	Drives and walks	0.70-0.85
Neighborhood areas	0.50-0.70	Roofs	0.75-0.95
Industrial		Lawns: Sandy Soil	
Light areas	0.50-0.80	Flat, 2 percent	0.05-0.10
Heavy areas	0.60-0.90	Average, 2 - 7 percent	0.10-0.15
Industrial		Steep, 7 percent	0.15-0.20
Railroad yard areas	0.20-0.40	Lawns: Heavy Soil	
Unimproved areas	0.10-0.30	Flat, 2 percent	0.13-0.17
Streets		Average, 2 - 7 percent	0.18-0.22
Asphaltic	0.70-0.95	Steep, 7 percent	0.25-0.35
Concrete	0.80-0.95		

You should choose the most appropriate runoff coefficient for your site or calculate a weighted-average coefficient, which takes into account different types of land use at your facility:

Weighted-average runoff coefficient =

$$(Area\ 1\ \% \ of\ total)(C1) + (Area\ 2\ \% \ of\ total)(C2) + (Area\ 3\ \% \ of\ total)(C3) + \dots + (Area\ i\ \% \ of\ total)(Ci)$$

where

C<sub>i</sub> = runoff coefficient for a specific land use of Area i.



## Instructions for Completing Part II of EPA Form R

### Example 13: Stormwater Runoff

Your facility is located in a semi-arid region of the United States that has an annual precipitation (including snowfall) of 12 inches of rain. (Snowfall should be converted to the equivalent inches of rain; assume one foot of snow is equivalent to one inch of rain.) The total area covered by your facility is 42 acres (about 170,000 square meters or 1,829,520 square feet). The area of your facility is 50 percent unimproved area, 10 percent asphaltic streets, and 40 percent concrete pavement.

The total stormwater runoff from your facility is therefore calculated as follows:

Land Use	% Total Area	Runoff Coefficient
Unimproved area	50	0.20
Asphaltic streets	10	0.85
Concrete pavement	40	0.90

Weighted-average runoff coefficient =  $[(50\%) \times (0.20)] + [(10\%) \times (0.85)] + [(40\%) \times (0.90)] = 0.545$

(Rainfall)  $\times$  (land area)  $\times$  (conversion factor)  $\times$  (runoff coefficient) = stormwater runoff  
 $(1 \text{ ft/year}) \times (1,829,520 \text{ ft}^2) \times (7.48 \text{ gal/ft}^3) \times (0.545) = 7,458,222 \text{ gallons/year}$

Total stormwater runoff = 7,458,222 gallons/year

Your stormwater monitoring data shows that the average concentration of zinc in the stormwater runoff from your facility from a biocide containing a zinc compound is 1.4 milligrams per liter. The total amount of zinc discharged to surface water through the plant wastewater discharge (non-stormwater) is 250 pounds per year. The total amount of zinc discharged with stormwater is:

$(7,458,222 \text{ gallons stormwater}) \times (3.785 \text{ liters/gallon}) = 28,229,370 \text{ liters stormwater}$

$(28,229,370 \text{ liters stormwater}) \times (1.4 \text{ mg zinc/liter}) \times 10^3 \text{ g/mg} \times (1/454) \text{ lb/g} = 87 \text{ lb zinc.}$

The total amount of zinc discharged from all sources of your facility is:

250 pounds zinc from wastewater discharged
<u>+87 pounds zinc from stormwater runoff</u>
337 pounds zinc total water discharged

The percentage of zinc discharge through stormwater reported in section 5.3 column C on Form R is:

$(87/337) \times 100\% = 26\%$

### Section 6. Transfer(s) of the Toxic Chemical in Wastes to Off-Site Locations

You must report in this section the total annual quantity of the EPCRA Section 313 chemical in wastes sent to any off-site facility for the purposes of disposal, treatment, energy recovery, or recycling. Report the total amount of the EPCRA Section 313 chemical transferred off-site after any on-site waste treatment, recycling, or removal is completed.

For all toxic chemicals (except the dioxin and dioxin-like compounds category), do not enter the

values in Section 6 in gallons, tons, liters, or any measure other than pounds. You must also enter the values as whole numbers. Numbers following a decimal point are not acceptable for toxic chemicals other than those designated as PBT chemicals. For PBT chemicals, facilities should report release and other waste management quantities greater than 0.1 pound (except the dioxin and dioxin-like compounds category) provided the accuracy and the underlying data on which the estimate is based supports this level of precision.

**Dioxin and dioxin-like compounds category.** Facilities should report at a level of precision supported by the accuracy of the underlying data

## *Instructions for Completing Part II of EPA Form R*

and the estimation techniques on which the estimate is based. Notwithstanding the numeric precision used when determining reporting eligibility thresholds, facilities should report on Form R to the level of accuracy that their data supports, up to seven digits to the right of the decimal. TRI-MEweb and EPA's data management systems support data precision to seven digits to the right of the decimal. The smallest quantity that needs to be reported on the Form R for the dioxin and dioxin-like compounds category is 0.0001 grams (see Example 12).

**NA vs. a Numeric Value (e.g., Zero).** You must enter a numeric value if you transfer an EPCRA Section 313 chemical to a Publicly Owned Treatment Works (POTW) or transfer wastes containing that toxic chemical to other off-site locations. If the aggregate amount transferred was less than 0.5 pound, then you should enter zero (unless the chemical is listed as a PBT chemical). Also report zero for transfers of listed mineral acids (i.e., hydrogen fluoride and nitric acid) if they have been neutralized to a pH of 6 or above prior to discharge to a POTW; do not check NA.

However, if you do not discharge wastewater containing the reported EPCRA Section 313 chemical to a POTW, you should check the "Not Applicable" box in Section 6.1. If you do not ship or transfer wastes containing the reported EPCRA Section 313 chemical to other off-site locations, you should check the "Not Applicable" box in Section 6.2. In TRI-MEweb, users may enter as many unique transfers as needed.

**Instructions for Reporters Claiming Trade Secret:** Number the boxes for reporting the information for each sequential POTW or other off-site location in Sections 6.1 and 6.2. In the upper left hand corner of each box, the section number is either 6.1.[ ] or 6.2.[ ]. This section is required only for paper filers (trade secret submissions only); TRI-MEweb does this task automatically for the reporting facility.

If you report a transfer of the listed EPCRA Section 313 chemical to one or more off-site locations, POTWs, you should number the boxes in Section 6.1 as 6.1.1, 6.1.2, etc. If you transfer the EPCRA Section 313 chemical to more than one POTW, you should photocopy Page 3 of Form R as many times as necessary and then number the boxes consecutively for each POTW (e.g., 6.1.2, 6.1.3,

etc.). At the bottom of each page 3 that is submitted, indicate the total number of pages numbered "3" that you are submitting as part of Form R, as well as indicating the sequence of those pages. For example, your facility transfers the reported EPCRA Section 313 chemical in wastewaters to two POTWs. You would photocopy Page 3 once, indicate at the bottom of each Page 3 that there are a total of two pages numbered "3" and then indicate the first and second Page 3. The box for the first POTW on the first Page 3 should be numbered 6.1.1 and while the box for second POTW on the second Page 3 should be numbered 6.1.2.

If you report a transfer of the EPCRA Section 313 chemical to one or more other off-site locations, you should number the boxes in section 6.2 as 6.2.1, 6.2.2, etc. If you transfer the EPCRA Section 313 chemical to more than two other off-site locations, you should photocopy Page 4 of Form R as many times as necessary and then number the boxes consecutively for each off-site location. At the bottom of Page 4 you will find instructions for indicating the total number of Page 4s that you are submitting as part of the Form R as well as indicating the sequence of those pages. For example, your facility transfers the reported EPCRA Section 313 chemical to three other off-site locations. You should photocopy page 4 once, indicate at the bottom of Section 6.2 on each Page 4 that there are a total of two Page 4s and then indicate the first and second Page 4. The boxes for the two off-site locations on the first Page 4 would be numbered 6.2.1 and 6.2.2, while the box for the third off-site location on the second Page 4 should be numbered 6.2.3. Please note that section 6.2 starts on Page 3 and continues on Page 4.

### **6.1 Discharges to Publicly Owned Treatment Works**

In Section 6.1, facilities using TRI-MEweb can click "**Add New POTW**" to use a search tool to search POTWs by location or NPDES ID. If the receiving POTW cannot be identified using the search, the user may enter the POTW information manually by clicking "**Enter New POTW**," and then provide the receiving POTWs' name and address.

Facilities should report for each POTW to which the facility discharges or otherwise transfers wastewater containing the reported EPCRA Section 313 chemical. The most common transfers of this type

## Instructions for Completing Part II of EPA Form R

will be conveyances of the toxic chemical in facility wastewater through underground sewage pipes; however, materials may also be trucked or transferred via some other direct methods to a POTW.

Facilities report the total quantity transferred to each POTW and the basis of estimate for the total quantity reported in Section 6.1.[ ]A or Section 6.1.[ ]B (for columns A and B, respectively).

When you enter quantities in Section 6.1 in TRI-MEweb, you will be prompted for information on the final disposition of the off-site transfer for use in Section 8 calculations (see instructions for Section 8). Removal and destruction rates for toxic chemicals sent to POTW (based on experimental and estimated data compiled by EPA) are pre-loaded into TRI-MEweb for this purpose but may be overridden if you have better information on the final disposition of the chemical readily available.

If you do not discharge wastewater containing the reported EPCRA Section 313 chemical to a POTW, enter NA in the box in Section 6.1. (See discussion of NA vs. a Numeric Value (e.g., Zero) in the introduction of Section 6).

### 6.1.[ ]A. *Quantity Transferred to Each POTW*

Enter the total amount, in pounds, of the reported EPCRA Section 313 chemical that is contained in the wastewaters transferred to each POTW. Do not enter the total poundage of the wastewaters. If the total amount transferred is less than 1,000 pounds, you may report a range by entering the appropriate range code (range reporting in section 6.1.[ ]\_A. does not apply to PBT chemicals). The following reporting range codes are to be used:

Code	Reporting Range (in pounds)
A	1-10
B	11-499
C	500-999

If you enter a range code in column A, some TRI data tools used by the public will display the midpoint of the range (i.e., 5, 250, or 750 lb).

### 6.1.[ ]B *Basis of Estimate*

You must identify the basis for your estimate of the total quantity of the reported EPCRA Section 313 chemical in the wastewater transferred to each POTW. You should enter one of the following letter

codes that applies to the method by which the largest percentage of the estimate was derived.

- M1 Estimate is based on continuous monitoring data or measurements for the EPCRA Section 313 chemical.
- M2 Estimate is based on periodic or random monitoring data or measurements for the EPCRA Section 313 chemical.
- C Estimate is based on mass balance calculations, such as calculation of the amount of the EPCRA Section 313 chemical in streams entering and leaving process equipment.
- E1 Estimate is based on published emission factors, such as those relating release quantity to through-put or equipment type (e.g., air emission factors).
- E2 Estimate is based on-site specific emission factors, such as those relating release quantity to through-put or equipment type (e.g., air emission factors).
- O Estimate is based on other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgment. This would include applying estimated removal efficiency to a waste stream, even if the composition of the stream before treatment was fully identified through monitoring data.

If you estimate the total quantities transferred of an EPCRA Section 313 chemical for one POTW using more than one calculation method, you should report the basis of estimate that was used to determine the largest percentage of the EPCRA Section 313 chemical that was transferred.

## 6.2 Transfers to Other Off-Site Locations

In Section 6.2, facilities using TRI-MEweb can click “**New Location**” to access a form to search off-site transfer locations by location or RCRA ID. to which the facility ships or transfers wastes containing the reported EPCRA Section 313 chemical for the purposes of disposal, treatment, energy recovery, or recycling. If the receiving other off-site location cannot be identified using the search, the user may enter the off-site location information clicking “**Enter New Location,**” and then indicating the receiving other off-site locations’ name and address. Reporters must also indicate if the receiving location is under the control of the reporting facility or parent company.

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In general, a RCRA ID Number (also called an EPA Identification Number) will commonly be found on the Uniform Hazardous Waste Manifest, which is required by RCRA regulations for the transfer of hazardous wastes. However, please note that an off-site transfer of a non-hazardous waste containing a TRI chemical may be received by a facility with a RCRA ID. If the receiving facility's RCRA ID is known, even if it is not associated with the waste transfer that you are initiating, it should be provided in Section 6.2. The purpose of the RCRA ID number is for the identification of the off-site transfer facility and not just to indicate a hazardous waste transfer. If you ship or transfer wastes containing an EPCRA Section 313 chemical and the off-site location does not have an EPA Identification Number, enter NA in the box for the off-site location EPA Identification Number.

Specifically for other off-site transfers, facilities must also report the type of disposal, treatment, energy recovery, or recycling methods used by the off-site location for the reported EPCRA Section 313 chemical (see Section 6.2 Column C). If appropriate, you must report multiple activities for each off-site location. For example, if your facility sends a reported EPCRA Section 313 chemical in a single waste stream to an off-site location where some of the EPCRA Section 313 chemical is to be recycled while the remainder of the quantity transferred is to be treated, you must report both the waste treatment and recycle activities, along with the quantity associated with each activity.

If your facility transfers an EPCRA Section 313 chemical to an off-site location and that off-site location performs more than four activities on that chemical, multiple transfers may be listed by clicking "+ Add Transfer."

If you do not ship or transfer wastes containing the EPCRA Section 313 chemical to other off-site locations, you should check the Not Applicable box in Section 6.2, "Transfers to Other Off-Site Locations."

If you ship or transfer the reported EPCRA Section 313 chemical in wastes to another country, you do not need to report a RCRA ID for that waste. You should check "Not Applicable" for the RCRA ID field. Enter the location information for the non-U.S. facility including: location name, address, city, province, country, and postal code. TRI-MEweb provides a dropdown for selecting countries and their Federal Information Processing Standards (FIPS) codes. The most commonly used FIPS country codes are listed in Table IV. To obtain a FIPS code for a country not listed, contact the TRI Information Center. There is nothing to enter in the state field.

### 6.2a Column A: Total Transfers

For each off-site location, enter the total amount, in pounds (in grams for dioxin and dioxin-like compounds), of the EPCRA Section 313 chemical that is contained in the waste transferred to that location. **Do not enter the total quantities of the waste.** If you do not ship or transfer wastes containing the EPCRA Section 313 chemical to other off-site locations, you should enter NA (See discussion of NA vs. a Numeric Value (e.g., Zero) in the introduction of Section 6) in the box for the off-site location's EPA Identification Number (defined in 40 CFR 260.10 and therefore commonly referred to as the RCRA ID Number).

If the total amount transferred is less than 1,000 pounds, you may report a range by entering the appropriate range code (range reporting in section 6.2 does not apply to PBT chemicals). The following reporting range codes are to be used:

Code	Reporting Range (in pounds)
A	1-10
B	11-499
C	500-999

Note that if you enter a range code in column A, some TRI data tools used by the public will display the midpoint of the range (i.e., 5, 250, or 750 lb).

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**Summary of Residue Quantities From Pilot-Scale Experimental Study<sup>a,b</sup>  
(weight percent of drum capacity)**

Unloading Method	Vessel Type	Value	Material			
			Kerosene <sup>c</sup>	Water <sup>d</sup>	Motor Oil <sup>e</sup>	Surfactant Solution <sup>f</sup>
Pumping	Steel drum	Range	1.93 - 3.08	1.84 - 2.61	1.97 - 2.23	3.06
		Mean	2.48	2.29	2.06	3.06
Pumping	Plastic drum	Range	1.69 - 4.08	2.54 - 4.67	1.70 - 3.48	Not Available
		Mean	2.61	3.28	2.30	
Pouring	Bung-top steel drum	Range	0.244 - 0.472	0.266 - 0.458	0.677 - 0.787	0.485
		Mean	0.404	0.403	0.737	0.485
Pouring	Open-top steel drum	Range	0.032 - 0.080	0.026 - 0.039	0.328 - 0.368	0.089
		Mean	0.054	0.034	0.350	0.089
Gravity Drain	Slope-bottom steel tank	Range	0.020 - 0.039	0.016 - 0.024	0.100 - 0.121	0.048
		Mean	0.033	0.019	0.111	0.048
Gravity Drain	Dish-bottom steel tank	Range	0.031 - 0.042	0.033 - 0.034	0.133 - 0.191	0.058
		Mean	0.038	0.034	0.161	0.058
Gravity Drain	Dish-bottom glass-lined tank	Range	0.024 - 0.049	0.020 - 0.040	0.112 - 0.134	0.040
		Mean	0.040	0.033	0.127	0.040

<sup>a</sup> From "Releases During Cleaning of Equipment." Prepared by PEI Associates, Inc., for the U.S. Environmental Protection Agency, Office of Pesticides and Toxic Substances, Washington DC, Contract No. 68-02-4248. June 30, 1986.

<sup>b</sup> The values listed in this table should only be applied to similar vessel types, unloading methods, and bulk fluid materials. At viscosities greater than 200 centipoise, the residue quantities can rise dramatically and the information on this table is not applicable.

<sup>c</sup> For kerosene, viscosity = 5 centipoise, surface tension = 29.3 dynes/cm<sup>2</sup>

<sup>d</sup> For water, viscosity = 4 centipoise, surface tension = 77.3 dynes/cm<sup>2</sup>

<sup>e</sup> For motor oil, viscosity = 94 centipoise, surface tension = 34.5 dynes/cm<sup>2</sup>

<sup>f</sup> For surfactant solution, viscosity = 3 centipoise, surface tension = 31.4 dynes/cm<sup>2</sup>

**Example 14: Container Residue**

You have determined that a Form R for an EPCRA Section 313 chemical must be submitted. The facility purchases and uses one thousand 55-gallon steel drums that contain a 10 percent solution of the chemical. Further, it is assumed that the physical properties of the solution are similar to water. The solution is pumped from the drums directly into a mixing vessel and the “empty” drums are triple-rinsed with water. The rinse water is indirectly discharged to a POTW and the cleaned drums are sent to a drum reclaimer.

In this example, it can be assumed that all of the residual solution in the drums was transferred to the rinse water. Therefore, the quantity transferred to the drum reclaimer should be reported as “zero.” The annual quantity of residual solution that is transferred to the rinse water can be estimated by multiplying the mean weight percent of residual solution remaining in water from pumping a steel drum (2.29 percent from the preceding table, “Summary of Residue Quantities From Pilot-Scale Experimental Study”) by the total annual weight of solution in the drum (density of solution multiplied by drum volume). If the density is not known, it may be appropriate to use the density of water (8.34 pounds per gallon):

$$(2.29\%) \times (8.34 \text{ pounds/gallon}) \times (55 \text{ gallons/drum}) \times (1,000 \text{ drums}) = 10,504 \text{ pounds solution}$$

The concentration of the EPCRA Section 313 chemical in the solution is only 10%.

$$(10,504 \text{ pounds solution}) \times (10\%) = 1,050 \text{ pounds}$$

Therefore, 1,050 pounds of the chemical are transferred to the POTW.

**Example 15: Reporting Metals and Metal Category Compounds that are sent Off-site**

A facility manufactures a product containing elemental copper, exceeding the processing threshold for copper. Various metal fabrication operations for the process produce a wastewater stream that contains some residual copper and off-specification copper material. The wastewater is collected and sent directly to a POTW. Periodic monitoring data show that 500 pounds of copper were transferred to the POTW in the reporting year. The POTW eventually releases these chemicals to a stream. The off-specification products (containing copper) are collected and sent off-site to a RCRA Subtitle C landfill. Sampling analyses of the product combined with hazardous waste manifests were used to determine that 1,200 pounds of copper in the off-spec product were sent to the off-site landfill.

Therefore, the facility must report 500 pounds in Sections 6.1 and 8.1d, and 1200 pounds in Sections 6.2 (waste code M65 (RCRA Subtitle C Landfill) should be used) and 8.1d.

Note that for EPCRA Section 313 chemicals that are not metals or metal category compounds, the quantity sent for treatment at POTWs and to other off-site treatment locations must be reported in Section 8.7 - Quantity Treated Off-site. However, if you know that some or all of the chemical is not treated for destruction at the off-site location you must report that quantity in Section 8.1.

## Instructions for Completing Part II of EPA Form R

If you transfer the EPCRA Section 313 chemical in wastes to an off-site facility for distinct and multiple purposes, you must report those activities for each off-site location, along with the quantity of the reported EPCRA Section 313 chemical associated with each activity. For example, your facility transfers a total of 15,000 pounds of toluene to an off-site location that will use 5,000 pounds for the purposes of energy recovery, will enter 7,500 pounds into a recovery process, and will dispose of the remaining 2,500 pounds. These quantities and the associated activity codes must be reported separately in Section 6.2. (See Figure 5 for a hypothetical Section 6.2 completed for two off-site locations, one of which receives the transfer of 15,000 pounds of toluene as detailed.) If you have fewer than four total transfers in Section 6.2 Column A (see examples in Figure 5), an NA should be placed in Column A of the first unused row to indicate the termination of the sequence. If all four rows are used, there is no need to terminate the sequence. If there are more than four total transfers, re-enter the name of the off-site location, address, etc. in the next row (6.2.2) and then you should enter NA when the sequence has terminated if there are fewer than 8 (i.e. anytime there are fewer than 4 transfers listed in a Section 6.2 block, an NA should be used to terminate the sequence).

Do not double or multiple count amounts transferred off-site. For example, when a reported EPCRA Section 313 chemical is sent to an off-site facility for sequential activities, you should report the final disposition of the toxic chemical.

### 6.2b Column B: Basis of Estimate

You must identify the basis for your estimates of the quantities of the reported EPCRA Section 313 chemical in waste transferred to each off-site location. Enter one of the following letter codes that applies to the method by which the largest percentage of the estimate was derived.

- M1 Estimate is based on continuous monitoring data or measurements for the EPCRA Section 313 chemical.
- M2 Estimate is based on periodic or random monitoring data or measurements for the EPCRA Section 313 chemical.
- C Estimate is based on mass balance calculations, such as calculation of the amount of the EPCRA Section 313 chemical

in streams entering and leaving process equipment.

- E1 Estimate is based on published emission factors, such as those relating release quantity to through-put or equipment type (e.g., air emission factors).
- E2 Estimate is based on site specific emission factors, such as those relating release quantity to through-put or equipment type (e.g., air emission factors).
- O Estimate is based on other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgment. This would include applying an estimated removal efficiency to a waste stream, even if the composition of the stream before treatment was fully identified through monitoring data.

### 6.2c Column C: Type of Waste Management: Disposal/ Treatment/Energy Recovery/Recycling

You should enter one of the following M codes to identify the type of disposal, treatment, energy recovery, or recycling methods used by the off-site location for the reported EPCRA Section 313 chemical. You must use separate transfers and codes for a single location when distinct quantities of the reported EPCRA Section 313 chemical are subject to different waste management activities, including disposal, treatment, energy recovery, or recycling. You must use the code that represents the ultimate disposition of the chemical.

If the EPCRA Section 313 chemical is sent off-site for further direct reuse (e.g., an EPCRA Section 313 chemical in used solvent that will be used as lubricant at another facility) and does not undergo a waste management activity (i.e., release (including disposal), treatment, energy recovery, or recycling (recovery)) prior to that reuse, it need not be reported in section 6.2 or section 8.

### Incineration vs. Energy Recovery

You must distinguish between incineration which is waste treatment, and legitimate energy recovery. For you to claim that a reported EPCRA Section 313 chemical sent off-site is used for the purposes of energy recovery and not for treatment for

## *Instructions for Completing Part II of EPA Form R*

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destruction, the EPCRA Section 313 chemical must have a significant heating value and must be combusted in an energy recovery unit such as an industrial boiler, furnace, or kiln. In a situation where the reported EPCRA Section 313 chemical is in a waste that is combusted in an energy recovery unit, but the EPCRA Section 313 chemical does not have a significant heating value, e.g., CFCs, you should use code M54, Incineration/Insignificant Fuel Value, to indicate that the EPCRA Section 313 chemical was incinerated in an energy recovery unit but did not contribute to the heating value of the waste.

### **Metals and Metal Category Compounds**

Metals and metal category compounds will be managed in waste either by being released (including disposed of) or by being recycled. Remember that the release and other waste management information that you report for metal category compounds will be the total amount of the parent metal released or recycled and NOT the whole metal category compound. The metal has no heat value and thus cannot be combusted for energy recovery and cannot be treated because it cannot be destroyed. Thus, transfers of metals and metal category compounds for further waste management should be reported as either a transfer for recycling or a transfer for disposal. The applicable waste management codes for transfers of metals and metal category compounds for recycling are M24, metals recovery, M93, waste broker - recycling, or M26, other reuse/recovery. Applicable codes for transfers for disposal include M10, M41, M62, M64, M65, M66, M67, M73, M79, M81, M82, M90, M94, and M99. These codes are for off-site transfers for further waste management in which the waste stream may be treated but the metal contained in the waste stream is not treated and is ultimately released. For example, M41 should be used for a metal or metal category compound that is stabilized in preparation for disposal.

Applicable codes for Part II, Section 6.2, column C are:

#### Disposal

- M10 Storage Only
- M41 Solidification/Stabilization - Metals and Metal Category Compounds only
- M62 Wastewater Treatment (Excluding POTW) - Metals and Metal Category Compounds only
- M64 Other Landfills
- M65 RCRA Subtitle C Landfills
- M66 Subtitle C Surface Impoundment
- M67 Other Surface Impoundments
- M73 Land Treatment
- M79 Other Land Disposal
- M81 Underground Injection to Class I Wells
- M82 Underground Injection to Class II-V Wells
- M90 Other Off-Site Management
- M94 Transfer to Waste Broker - Disposal
- M99 Unknown

#### Treatment

- M40 Solidification/Stabilization
- M50 Incineration/Thermal Treatment
- M54 Incineration/Insignificant Fuel Value
- M61 Wastewater Treatment (Excluding POTW)
- M69 Other Waste Treatment
- M95 Transfer to Waste Broker - Waste Treatment

#### Energy Recovery

- M56 Energy Recovery
- M92 Transfer to Waste Broker - Energy Recovery

#### Recycling

- M20 Solvents/Organics Recovery
- M24 Metals Recovery
- M26 Other Reuse or Recovery
- M28 Acid Regeneration
- M93 Transfer to Waste Broker - Recycling



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<b>SECTION 6. TRANSFER(S) OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS</b>													
<b>6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)</b>						NA <input type="checkbox"/>							
6.1. POTW Name													
POTW Address													
City		County			State		ZIP						
A. Quantity Transferred to this POTW (pounds/year*) (Enter range code** or estimate)					B. Basis of Estimate (Enter code)								
					O								
If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box <input type="checkbox"/>													
and indicate the Part II, Section 6.1 page number in this box. <input type="checkbox"/> (Example: 1, 2, 3, etc.)													
<b>SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS</b>						NA <input checked="" type="checkbox"/>							
6.2. Off-Site EPA Identification Number (RCRA ID No.)						COD56616246							
Off-Site Location Name: Acme Waste Services													
Off-Site Address: 5 Market Street													
City		Anywhere			County		Hill	State	CO	ZIP	80461	Country (non-US)	
Is this location under control of reporting facility or parent company?										Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/>	

This off-site location receives a transfer of 15,000 pounds of toluene and will combust 5,000 pounds for the purposes of energy recovery, will enter 7,500 pounds into a recovery process, and will dispose of the remaining 2,500 pounds.

<b>SECTION 6.2. TRANSFERS TO OTHER OFF-SITE LOCATION (CONTINUED)</b>													
A. Total Transfer (pounds/year*) (Enter a range code** or estimate)				B. Basis of Estimate (Enter code)				C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (Enter code)					
1. 5,000				1. O				1. M 56					
2. 7,500				2. C				2. M 20					
3. 2,500				3. O				3. M 60					
4. NA				4.				4. M					
6.2. Off-Site EPA Identification Number (RCRA ID No.)						COD16772543							
Off-Site Location Name: Combustion, Inc.													
Off-Site Address: 25 Facility Road													
City		Dumfry			County		Burns	State	CO	ZIP	80500	Country (non-US)	
Is this location under control of reporting facility or parent company? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>													
A. Total Transfer (pounds/year*) (Enter a range code** or estimate)				B. Basis of Estimate (Enter code)				C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (Enter code)					
1. 12,500				1. O				1. M 54					
2. NA				2.				2. M					
3.				3.				3. M					
4.				4.				4. M					

This off-site location receives a transfer of 12,500 pounds of tetrachloroethylene (perchloroethylene) that is part of a waste that is combusted for the purposes of energy recovery in an industrial furnace. Note that the tetrachloroethylene should be reported using code M54 to indicate that it is combusted in an energy recovery unit but it does not contribute to the heating value of the waste.

**Figure 5. Hypothetical Section 6.2 Completed for Two Off-Site Locations**

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### **Section 7. On-Site Waste Treatment, Energy Recovery, and Recycling Methods**

You must report in this section the methods of waste treatment, energy recovery, and recycling applied to the reported EPCRA Section 313 chemical in wastes on-site. There are three separate sections for reporting such activities. Section 7A column c and Section 7A column e were deleted from Form R in 2005. Section 7A column d remained on the form until 2010. In 2011, column d was renamed column c which is addressed below.

#### **Section 7A: On-Site Waste Treatment Methods and Efficiency**

Most of the chemical-specific information required by EPCRA Section 313 that is reported on Form R is specific to the EPCRA Section 313 chemical rather than the waste stream containing the EPCRA Section 313 chemical. However, EPCRA Section 313 does require that waste treatment methods applied on-site to waste streams that contain the EPCRA Section 313 chemical be reported. This information is reportable regardless of whether the facility actively applies treatment or the treatment of the waste stream occurs passively. This information is collected in Section 7A of Form R.

In Section 7A, you must provide the following information if you treat waste streams containing the reported EPCRA Section 313 chemical on-site:

- (a) The general waste stream types containing the EPCRA Section 313 chemical being reported;
- (b) The waste treatment method(s) or sequence used on all waste streams containing the EPCRA Section 313 chemical; and
- (c) The efficiency of each waste treatment method or waste treatment sequence in destroying or removing the EPCRA Section 313 chemical.

When entering on-site treatment data in TRI-MEweb, use a separate waste treatment profile in Section 7A for each general waste stream type. Each profile contains the general waste stream type (7A Column a) and all waste treatment methods associated with that stream (7A Column b). In TRI-MEweb, each profile treatment stream is assigned a name. Each waste treatment profile generated for a facility is available to be used for other forms from the same facility for the same reporting year. Report

only information about treatment of waste streams at your facility, not information about off-site waste treatment.

For each waste treatment profile, provide the appropriate waste treatment efficiency code (7A Column c) for that chemical.

TRI-MEweb may also simultaneously collect total quantities treated on-site for the current reporting year for this chemical (see Section 8.6).

If you do not perform on-site treatment of waste streams containing the reported EPCRA Section 313 chemical, check the "Not Applicable" box for Section 7A.

#### **7A Column a: General Waste Stream**

For each waste treatment method, indicate the type of waste stream containing the EPCRA Section 313 chemical that is treated. Select the letter code that corresponds to the general waste stream type:

- A Gaseous (gases, vapors, airborne particulates)
- W Wastewater (aqueous waste)
- L Liquid waste streams (non-aqueous waste)
- S Solid waste streams (including sludges and slurries)

If a waste is a combination of water and organic liquid and the organic content is less than 50 percent, report it as a wastewater (W). Slurries and sludges containing water should be reported as solid waste if they contain appreciable amounts of dissolved solids, or solids that may settle, such that the viscosity or density of the waste is considerably different from that of process wastewater.

#### **7A Column b: Waste Treatment Method(s) Sequence**

Enter the appropriate waste treatment code from the list below for each on-site waste treatment method used on a waste stream containing the EPCRA Section 313 chemical, regardless of whether the waste treatment method actually removes the specific EPCRA Section 313 chemical being reported. Waste treatment methods must be reported for each type of waste stream being treated (i.e., gaseous waste streams, aqueous waste streams, liquid non-aqueous waste streams, and solids). Except for the air emission treatment codes, the

## ***Instructions for Completing Part II of EPA Form R***

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waste treatment codes are not restricted to any medium.

Waste streams containing the EPCRA Section 313 chemical may have a single source or may be aggregates of many sources. For example, process water from several pieces of equipment at your facility may be combined prior to waste treatment. Report waste treatment methods that apply to the aggregate waste stream, as well as waste treatment methods that apply to individual waste streams. If your facility treats various wastewater streams containing the EPCRA Section 313 chemical in different ways, the different waste treatment methods must be listed separately.

If your facility has several pieces of equipment performing a similar service in a waste treatment sequence, you may combine the reporting for such equipment. It is not necessary to enter four codes to cover four scrubber units, for example, if all four are treating waste streams of similar character (e.g., sulfuric acid mist emissions), have similar influent concentrations, and have similar removal

efficiencies. If, however, any of these parameters differs from one unit to the next, each scrubber should be listed separately.

If you are using the hard copy paper form (trade secret submissions only), and if your facility performs more than eight sequential waste treatment methods on a single general waste stream, continue listing the methods in the next row and renumber appropriately those waste treatment method code boxes you used to continue the sequence. For example, if the general waste stream in box 7A.1a had nine treatment methods applied to it, the ninth method would be indicated in the first method box for row 7A.2a. The numeral "1" would be crossed out, and a "9" would be inserted.

Treatment applied to any other general waste stream types would then be listed in the next empty row. In the scenario below, for instance, the second general waste stream would be reported in row 7A.3a. See Figure 6 for an example of a hypothetical section 7A.

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### Example 16: Calculating Releases and Other Waste Management Quantities

Your facility disposes of 14,000 pounds of lead chromate ( $\text{PbCrO}_4 \cdot \text{PbO}$ ) in an on-site landfill and transfers 16,000 pounds of lead selenite ( $\text{PbSeO}_4$ ) to an off-site land disposal facility. You would therefore be submitting three separate reports on the following: lead compounds, selenium compounds, and chromium compounds. However, the quantities you would be reporting would be the pounds of “parent” metal being released on-site or transferred off-site for further waste management. All quantities are based on mass balance calculations (See Section 5, Column B for information on Basis of Estimate and Section 6.2, Column C for waste management codes and information on transfers of EPCRA Section 313 chemicals in wastes). You would calculate releases of lead, chromium, and selenium by first determining the percentage by weight of these metals in the materials you use as follows:

#### Lead Chromate ( $\text{PbCrO}_4 \cdot \text{PbO}$ )

Lead (2 Pb atoms)

Chromium (1 Cr atom)

Molecular weight = 546.37

Atomic weight =  $207.2 \times 2 = 414.4$

Atomic weight = 51.996

Lead chromate is therefore (percent by weight):

$(414.4/546.37) = 75.85\%$  lead and

$(51.996/546.37) = 9.52\%$  chromium.

#### Lead Selenite ( $\text{PbSeO}_4$ )

Lead (1 Pb atom)

Selenium (1 Se atom)

Molecular weight = 350.17

Atomic weight = 207.2

Atomic weight = 78.96

Lead selenite is therefore (percent by weight):

$(207.2/350.17) = 59.17\%$  lead and

$(78.96/350.17) = 22.55\%$  selenium.

The total pounds of lead, chromium, and selenium disposed of on or off-site from your facility are as follows:

#### Lead

Disposal on-site:

$0.7585 \times 14,000 = 10,619$  pounds from lead chromate

Transfer off-site for disposal:

$0.5917 \times 16,000 = 9,467$  pounds from lead selenite

#### Chromium

Disposal on-site:

$0.0952 \times 14,000 = 1,333$  pounds from lead chromate

#### Selenium

Transfer off-site for disposal:

$0.2255 \times 16,000 = 3,608$  pounds from lead selenite

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<b>SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY</b>							
<input type="checkbox"/> Not Applicable (NA) - Check here if no on-site waste treatment method is applied to any waste stream containing the toxic chemical or chemical category.							
a. General Waste Stream (Enter code)	b. Waste Treatment Method(s) Sequence (Enter 3- or 4-character code(s))						c. Waste Treatment Efficiency (Enter 2 character code)
7A.1a	7A.1b		1	2	3	7A.1c	
W	3	H101	4	H123	5	H124	
	6	H082	7	H129	8	H083	
				H081		H075	
7A.2a	7A.2b		1	H077	2	NA	
	3		4		5		
	6		7		8	E4	
7A.3a	7A.3b		1	A01	2	NA	
A	3		4		5		
	6		7		8	E5	

**Figure 6. Hypothetical Section 7A**

**Waste Treatment Codes**

- A01 Flare
- A02 Condenser
- A03 Scrubber
- A04 Absorber
- A05 Electrostatic Precipitator
- A06 Mechanical Separation
- A07 Other Air Emission Treatment
- H040 Incineration--thermal destruction other than use as a fuel
- H071 Chemical reduction with or without precipitation
- H073 Cyanide destruction with or without precipitation
- H075 Chemical oxidation
- H076 Wet air oxidation
- H077 Other chemical precipitation with or without pre-treatment
- H081 Biological treatment with or without precipitation
- H082 Adsorption
- H083 Air or steam stripping
- H101 Sludge treatment and/or dewatering
- H103 Absorption
- H111 Stabilization or chemical fixation prior to disposal
- H112 Macro-encapsulation prior to disposal
- H121 Neutralization
- H122 Evaporation
- H123 Settling or clarification
- H124 Phase separation
- H129 Other treatment

percentage of the EPCRA Section 313 chemical removed from the waste stream through destruction, biological degradation, chemical conversion, or physical removal. The waste treatment efficiency (expressed as a range of percent removal) represents the percentage of the EPCRA Section 313 chemical destroyed or removed (based on amount or mass), not merely changes in volume or concentration of the EPCRA Section 313 chemical in the waste stream. The efficiency, which can reflect the overall removal from sequential treatment methods applied to the general waste stream, refers only to the percent destruction, degradation, conversion, or removal of the EPCRA Section 313 chemical from the waste stream; it does not refer to the percent conversion or removal of other constituents in the waste stream. The efficiency also does not refer to the general efficiency of the treatment method for any waste stream. For some waste treatment methods, the percent removal will represent removal by several mechanisms, as in an aeration basin, where an EPCRA Section 313 chemical may evaporate, biodegrade, or be physically removed from the sludge.

**7A Column c: Waste Treatment Efficiency Estimate**

In the space provided, enter the range code, based upon the codes listed below, indicating the

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Percent removal can be calculated as follows:

$$\frac{(I - E)}{I} \times 100\%$$

where:

I = amount of the EPCRA Section 313 chemical in the influent waste stream (entering the waste treatment step or sequence) and

E = amount of the EPCRA Section 313 chemical in the effluent waste stream (exiting the waste treatment step or sequence).

Calculate the amount of the EPCRA Section 313 chemical in the influent waste stream by multiplying the concentration (by weight) of the EPCRA Section 313 chemical in the waste stream by the total amount or weight of the waste stream. In most cases, the percent removal compares the treated effluent to the influent for the particular type of waste stream. For solidification of wastewater, the waste treatment efficiency can be reported as code E1 (greater than 99.9999 percent) if no volatile EPCRA Section 313 chemicals were removed with the water or evaporated into the air. Percent removal does not apply to incineration because the waste stream, such as wastewater or liquids, may not exist in a comparable form after waste treatment and the purpose of incineration as a waste treatment is to destroy the EPCRA Section 313 chemical by converting it to carbon dioxide and water or other byproducts. In cases where the EPCRA Section 313 chemical is incinerated, the percent efficiency must be based on the amount of the EPCRA Section 313 chemical destroyed or combusted, except for metals or metal category compounds. In the cases in which a metal or metal category compound is incinerated, the efficiency is reported as code E6 (equal to or greater than 0 percent, but less than or equal to 50 percent).

Similarly, an efficiency of zero must be reported for any waste treatment method(s) that does not destroy, chemically convert or physically remove the EPCRA Section 313 chemical from the waste stream.

For metal category compounds, the calculation of the reportable concentration and waste treatment efficiency must be based on the weight of the parent metal, not on the weight of the metal compound. Metals are not destroyed, only physically removed or chemically converted from one form into another.

The waste treatment efficiency reported must represent only physical removal of the parent metal from the waste stream (except for incineration), not the percent chemical conversion of the metal compound. If a listed waste treatment method converts but does not remove a metal (e.g., chromium reduction), the method must be reported with a waste treatment efficiency of code E6 (equal to or greater than 0 percent, but less than or equal to 50 percent).

EPCRA Section 313 chemicals that are strong mineral acids neutralized to a pH of 6 or above are considered treated at 100 percent efficiency.

When calculating waste treatment efficiency, EPCRA Section 313(g)(2) requires a facility to use readily available data (including monitoring data) collected pursuant to other provisions of law, or, where such data are not readily available, "reasonable estimates" of the amounts involved.

### **Waste Treatment Efficiency Range Codes:**

- E1 = greater than 99.9999%
- E2 = greater than 99.99%, but less than or equal to 99.9999%
- E3 = greater than 99%, but less than or equal to 99.99%
- E4 = greater than 95%, but less than or equal to 99%
- E5 = greater than 50%, but less than or equal to 95%
- E6 = equal to or greater than 0%, but less than or equal to 50%

### **Section 7B On-site Energy Recovery Processes**

In Section 7B, you must indicate the on-site energy recovery methods used on the reported EPCRA Section 313 chemical.

EPA considers an EPCRA Section 313 chemical to be combusted for energy recovery if the toxic chemical has a significant heat value and is combusted in an energy recovery device. If a reported EPCRA Section 313 chemical is incinerated on-site but does not contribute energy to the process (e.g., chlorofluorocarbons), it must be considered waste treated on-site and reported in Section 7A. Metals and metal category compounds cannot be combusted for energy recovery and should NOT be reported in this section. Do not include the combustion of fuel oils, such as fuel oil

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#6, in this section. Energy recovery may take place only in an industrial kiln, furnace, or boiler.

**NA vs. a Numerical Value (e.g., Zero).** If you do not perform on-site energy recovery for a waste stream that contains or contained the EPCRA Section 313 chemical, check the NA box at the top of Section 7B and enter NA in Section 8.2. If you perform on-site energy recovery for the waste stream that contains or contained the EPCRA Section 313 chemical, enter the appropriate code in Section 7B and enter the appropriate value in Section 8.2. If this quantity is less than or equal to 0.5 pound, round to zero (unless the chemical is a listed PBT chemical) and enter zero in 8.2. (Note: for metals and metal compounds, you should only report NA in Sections 7B and Section 8.2.)

### Energy Recovery Codes

- U01 Industrial Kiln
- U02 Industrial Furnace
- U03 Industrial Boiler

If your facility uses more than one on-site energy recovery method for the reported EPCRA Section 313 chemical, list the methods used in descending order (greatest to least) based on the amount of the EPCRA Section 313 chemical entering such methods.

TRI-MEweb will also simultaneously collect total quantity used for energy recovery on-site for the current reporting year for this chemical (see Section 8.2).

### ***Section 7C On-site Recycling Processes***

In Section 7C, you must report the recycling methods used on the EPCRA Section 313 chemical.

In this section, use the codes below to report only the recycling methods in place at your facility that are applied to the EPCRA Section 313 chemical. Do not list any off-site recycling activities. (Information about off-site recycling must be reported in Part II, Section 6, "Transfers of the Toxic Chemical in Wastes to Off-site Locations.")

**NA vs. a Numerical Value (e.g., Zero).** If you do not perform on-site recycling for the reported EPCRA Section 313 chemical, check the NA box at the top of Section 7C and enter NA in Section 8.4. If you perform on-site recycling for the reported EPCRA Section 313 chemical, enter the appropriate code in Section 7C and enter the appropriate value in Section 8.4. If this quantity is less than or equal to 0.5 pound, round to zero (unless the chemical is a listed PBT chemical) and enter 0 in Section 8.4.

### On-Site Recycling Codes

- H10 Metal recovery (by retorting, smelting, or chemical or physical extraction)
- H20 Solvent recovery (including distillation, evaporation, fractionation or extraction)
- H39 Other recovery or reclamation for reuse (including acid regeneration or other chemical reaction process)

If your facility uses more than one on-site recycling method for an EPCRA Section 313 chemical, enter the codes in the space provided in descending order (greatest to least) based on the volume of the reported EPCRA Section 313 chemical recovered by each process.

TRI-MEweb will also simultaneously collect total quantity recycled on-site for the current reporting year for this chemical (see Section 8.4).

## Instructions for Completing Part II of EPA Form R

### Example 17: On-Site Waste Treatment

A process at the facility generates a wastewater stream containing an EPCRA Section 313 chemical (chemical A). A second process generates a wastewater stream containing two EPCRA Section 313 chemicals, a metal (chemical B) and a mineral acid (chemical C). Thresholds for all three chemicals have been exceeded and you are in the process of completing separate Form Rs for each chemical.

These two wastewater streams are combined and sent to an on-site wastewater treatment system before being discharged to a POTW. This system consists of an oil/water separator that removes 99 percent of chemical A; a neutralization tank in which the pH is adjusted to 7.5, thereby destroying 100 percent of the mineral acid (chemical C); and a settling tank where 95 percent of the metal (chemical B) is removed from the water (and eventually landfilled off-site).

Section 7A should be completed slightly differently when you file the Form R for each of the chemicals. The table accompanying this example shows how Section 7A should be completed for each chemical. First, on each Form R you should identify the type of waste stream in Section 7A.1a as wastewater (aqueous waste, code W). Next, on each Form R you should list the code for each of the treatment steps that is applied to the entire waste stream, regardless of whether the operation affects the chemical for which you are completing the Form R (for instance, the first four blocks of Section 7A.1b of all three Form Rs should show: H124 (phase separation), H121 (neutralization), H123 (settling or clarification), and N/A (to signify the end of the treatment system). Note that Section 7A.1b is not chemical specific. It applies to the entire waste stream being treated. Section 7A.1c applies to the efficiency of the entire system in destroying and/or removing the chemical for which you are preparing the Form R. You should enter E4 when filing for chemical A, E5 for chemical B, and E1 for chemical C.

#### Chemical A

7A.1a	7A.1b	1. H124	2. H121	7A.1c
W	3. H123	4. N/A	5.	E4
	6.	7.	8.	

#### Chemical B

7A.1a	7A.1b	1. H124	2. H121	7A.1c
W	3. H123	4. N/A	5.	E5
	6.	7.	8.	

#### Chemical C

7A.1a	7A.1b	1. H124	2. H121	7A.1c
W	3. H123	4. N/A	5.	E1
	6.	7.	8.	

Note that the *quantity* removed and/or destroyed is not reported in Section 7 and that the efficiency reported in Section 7A.1c refers to the amount of EPCRA Section 313 chemical destroyed *and/or removed* from the applicable waste stream. The amount actually destroyed should be reported in Section 8.6 (quantity treated on-site). For example, when completing the Form R for chemical B you should report "N/A" pounds in Section 8.6 because the metal has been removed from the wastewater stream, but not actually destroyed. The quantity of chemical B that is ultimately landfilled off-site should be reported in Sections 6.2 and 8.1c. However, when completing the Form R for chemical C, you should report the entire quantity in Section 8.6 because raising the pH to 7.5 will completely destroy the mineral acid.



## Instructions for Completing Part II of EPA Form R

### Example 18: Reporting On-Site Energy Recovery

One waste stream generated by your facility contains, among other chemicals, toluene and Freon 113. Threshold quantities are exceeded for both of these EPCRA Section 313 chemicals, and you would, therefore, submit two separate Form R reports. This waste stream is sent to an on-site industrial furnace that uses the heat generated in a thermal hydrocarbon cracking process at your facility. Because toluene has a significant heat value (17,440 BTU/pound) and the energy is recovered in an industrial furnace, the code "U02-Industrial Furnace" would be selected for the energy recovery method in Section 7B for the Form R submitted for toluene.

However, as Freon 113 does not contribute any value for energy recovery purposes, the combustion of Freon 113 in the industrial furnace is considered waste treatment, not energy recovery. You would report Freon 113 as entering a waste treatment step (i.e., incineration), in Section 7A, column b. In Section 7B the facility should report zero.

### Section 8. Source Reduction and Waste Management

This section includes the data elements mandated by Section 6607 of the Pollution Prevention Act of 1990 (PPA).

In Section 8, you must provide information about source reduction activities and quantities of the EPCRA Section 313 chemicals managed as waste. For all appropriate questions, report only the quantity, in pounds, (or, for the dioxin and dioxin-like compounds category, grams) of the reported EPCRA Section 313 chemical itself. Do not include the weight of water, soil, or other waste constituents. When reporting on the metal category compounds, you should report only the amount of the metal portion of the compound as you do when estimating release and other waste management amounts.

Sections 8.1 through 8.9 must be completed for each EPCRA Section 313 chemical. Section 8.10 must be completed only if a source reduction activity was newly implemented specifically (in whole or in part) for the reported EPCRA Section 313 chemical during the reporting year. Section 8.11 allows you to submit additional optional information on source reduction, recycling, or pollution control activities implemented for the reported EPCRA Section 313 chemical at any time at your facility.

Sections 8.1 through 8.7 require reporting of production-related waste management quantities for the current reporting year, the prior year, and quantities anticipated in both the first year immediately following the reporting year and the

second year following the reporting year (future estimates).

Do not enter the values in Section 8 in gallons, tons, liters, or any measure other than pounds (or, for the dioxin and dioxin-like compounds category, grams). For non-PBT chemicals, you must generally enter the values as whole numbers; numbers following a decimal point are not acceptable for non-PBT chemicals except as noted in the instructions for Sections 8.1c-d and 8.7. For PBT chemicals (except the dioxin and dioxin-like compounds category), facilities should report release and other waste management quantities greater than 0.1 pound provided the accuracy and the underlying data on which the estimate is based supports this level of precision.

For the dioxin and dioxin-like compounds category, facilities should report at a level of precision supported by the accuracy of the underlying data and the estimation techniques on which the estimate is based. However, the smallest quantity that need be reported on the Form R for the dioxin and dioxin-like compounds category is 0.0001 grams (see Example 12). Notwithstanding the numeric precision used when determining reporting eligibility thresholds, facilities should report on Form R to the level of accuracy that their data supports, up to seven digits to the right of the decimal. EPA's reporting software and data management systems support data precision to seven digits to the right of the decimal.

**NA vs. a Numeric Value (e.g., Zero).** You should enter a numeric value in the relevant sections of Section 8 if your facility has released, treated,

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combusted for energy recovery or recycled any quantity of an EPCRA Section 313 chemical during the reporting year. If the aggregate quantity of that toxic chemical was equal to or less than 0.5 pound for a particular waste management method, you should enter the value zero (unless the chemical is a PBT chemical) in the relevant section. In the case of PBTs (excluding dioxin) if the aggregate quantity of the toxic chemical is equal to or less than 0.1 pound for a particular waste management method, you should enter the value zero in the relevant section. For dioxin, if the aggregate quantity is equal to or less than .0001 grams for a particular waste management method, you should enter the value zero in the relevant section. For both PBTs and dioxin, the accuracy of the underlying data on which the estimate is based must support the specified level of precision in order to round to zero.

However, if there has been no on-site or off-site treatment, combustion for energy recovery, or recycling of the waste stream containing the EPCRA Section 313 chemical, then you should enter NA in the relevant section. (Note: for metals and metal category compounds, you should enter NA in Sections 8.2, 8.3, 8.6 and 8.7, as treatment and combustion for energy recovery generally are not applicable waste management methods for metals and metal compounds). For Section 8.1b, NA generally is not applicable recognizing the potential for spills, leaks, or fugitive emissions of the EPCRA Section 313 chemical. You should enter NA in Section 8.8 if there were no remedial actions, catastrophic events such as earthquakes, fires, or floods or one-time events not associated with normal or routine production processes for that toxic chemical. If there was a catastrophic event at your facility, but you were able to prevent any releases from occurring, then enter zero in Section 8.8.

### **Relationship to Other Laws**

The reporting categories for quantities recycled, used for energy recovery, treated, and disposed of apply to completing Section 8 of Form R as well as to the rest of Form R. These categories are to be used only for TRI reporting. They are not intended for use in determining, under the Resource Conservation and Recovery Act (RCRA) Subtitle C regulations, whether a secondary material is a waste when recycled. These categories also do not apply to the information that may be submitted in the Biennial Report required under RCRA. In addition, these categories do not imply any future redefinition

of RCRA terms and do not affect EPA's RCRA authority or authority under any other statute administered by EPA.

Differences in terminology and reporting requirements for EPCRA Section 313 chemicals reported on Form R and for hazardous wastes regulated under RCRA occur because EPCRA and the PPA focus on specific chemicals, while the RCRA regulations and the Biennial Report focus on waste streams that may include more than one chemical. For example, assume that a RCRA hazardous waste containing an EPCRA Section 313 chemical is recycled to recover certain constituents of that waste, but not the toxic chemical reported under EPCRA Section 313. The EPCRA Section 313 chemical simply passes through the recycling process and remains in the residual from the recycling process, which is disposed of. While the waste may be considered recycled under RCRA, for TRI purposes, the EPCRA Section 313 chemical constituent would be considered to be disposed of (as part of the residual from the recycling process).

An EPCRA Section 313 chemical or an EPCRA Section 313 chemical in a mixture that is a waste under RCRA must be reported in Sections 8.1 through 8.8.

### **Sections 8.1 – 8.7: Production-Related Waste Managed**

**Column A: Prior Year.** Quantities for Sections 8.1 through 8.7 must be reported for the year immediately preceding the reporting year in column A. For reports due July 1, 2015 (reporting year 2014), the prior year is 2013. Information available at the facility that may be used to estimate the prior year's quantities include the prior year's Form R submission, supporting documentation, and recycling, energy recovery, treatment, or disposal operating logs or invoices. When reporting prior year estimates, facilities are not required to use quantities reported on the previous year's form if better information is available. TRI-MEweb prepopulates this column on the TRI form if the facility reported the previous year.

**Column B: Current Reporting Year.** Quantities for Sections 8.1 through 8.7 must be reported for the current reporting year in column B.

**Columns C and D: Following Year and Second Following Year.** Quantities for Sections 8.1 through

## Instructions for Completing Part II of EPA Form R

8.7 must be estimated for the following two years. EPA expects reasonable future quantity estimates using a logical basis. Information available at the facility to estimate quantities of the chemical expected during these years include (but are not limited to) planned source reduction activities, market projections, expected contracts, anticipated new product lines, company growth projections, and production capacity figures. Respondents should take into account protections available for trade secrets as provided in EPCRA Section 322 (42 USC 11042) for the chemical identity.

### Example 19: Reporting Future Estimates

A pharmaceutical manufacturing facility uses an EPCRA Section 313 chemical in the manufacture of a prescription drug. During the reporting year (2013), the company received approval from the Food and Drug Administration to begin marketing their product as an over-the-counter drug beginning in 2014. This approval is publicly known and does not constitute confidential business information. As a result of this expanded market, the company estimates that sales and subsequent production of this drug will increase their use of the reported EPCRA Section 313 chemical by 30 percent per year for the two years following the reporting year. The facility treats the EPCRA Section 313 chemical on-site and the quantity treated is directly proportional to production activity. The facility thus estimates the total quantity of the reported EPCRA Section 313 chemical treated for the following year (2014) by adding 30 percent to the amount in column B (the amount for the current reporting year). The second following year (2015) figure can be calculated by adding an additional 30 percent to the amount reported in column C (the amount for the following year (2014) projection).

### Quantities Reportable in Sections 8.1 - 8.7

Section 8 of Form R uses data collected to complete Part II, Sections 5 through 7. For this reason, Section 8 should be completed last. The relationship between Sections 5, 6, and 8.8 to Sections 8.1, 8.3, 8.5, and 8.7 are provided below in equation form. EPA recommends that you use these equations to complete Sections 8.1, 8.3, 8.5, and 8.7 for the current year and discourages rounding. For Column

B (current year), TRI-MEweb will use these equations to complete these Sections automatically.

**Note on Equations.** Where an equation includes a value followed by a parenthetical, this means that the equation is referring only to the portion of that value described by the parenthetical. For example, “**Section 6.2 (recycling)**” refers to the portion of the value for Section 6.2 that is recycled, while “**Section 6.2 (treatment)**” refers to the portion of the value for Section 6.2 that is treated.

**Section 8.1.** In Section 8.1, facilities report disposal and other releases. This includes on-site disposal and other releases reported in Section 5 and off-site disposal and other releases reported in Section 6, but excludes quantities reported in Section 5 and 6 due to remedial actions, catastrophic events, or non-production related one-time events (see the discussion on Section 8.8). Note that EPCRA Section 329(8) defines release as “any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment of barrels, containers, and other closed receptacles).”

Metals and metal category compounds reported in 1) Section 6.2 as sent off-site for stabilization/solidification (M41) or wastewater treatment (excluding POTWs) (M62) and/or 2) Section 6.1 - discharges to POTWs, should be reported in Section 8.1. These quantities should NOT be reported in Section 8.7 because the metals are not ultimately destroyed.

Beginning in the 2003 reporting year, Section 8.1 was divided into four Subsections (8.1a, 8.1b, 8.1c and 8.1d). Please refer to the following equations that show the relationship between Sections 5, 6, 8.8, and 8.1a through 8.1d.

## *Instructions for Completing Part II of EPA Form R*

**Sections 8.1a and 8.1b.** Toxic chemicals disposed of or otherwise released on-site are reported in 8.1a or 8.1b as appropriate. Toxic chemicals sent off-site for disposal are reported in 8.1c or 8.1d.

**Section 8.1a = Section 5.4.1 + Section 5.5.1A + Section 5.5.1B - Section 8.8 (on-site disposal to landfills or UIC Class I Wells)<sup>2</sup>**

**Section 8.1b = Section 5.1 + Section 5.2 + Section 5.3 + Section 5.4.2 + Section 5.5.2 + Section 5.5.3A + Section 5.5.3B + Section 5.5.4 - Section 8.8 (on-site disposal or other releases, other than disposal to landfills or UIC Class I Wells)<sup>2</sup>**

**Sections 8.1c and 8.1d.** Toxic chemicals transferred off-site to POTWs or other off-site locations and then disposed of or otherwise released should be reported in 8.1c or 8.1d as appropriate. For example, quantities of a toxic chemical sent to a landfill, or sent to a POTW and subsequently sent to a landfill are reported in Section 8.1c, while quantities of a toxic chemical sent to a surface impoundment, or sent to a POTW and subsequently released to a stream, are reported in Section 8.1d. Metals and metal category compounds sent to POTWs should be reported in one of these two sections and should not be reported as treated for destruction in Section 8.7.

**Section 8.1c = Section 6.1 (portion of transfer that is not treated for destruction and is ultimately disposed of in landfills or UIC Class I Wells) + Section 6.2 (quantities associated with M codes M64, M65 and M81) - Section 8.8 (off-site disposal to landfills or UIC Class I Wells)<sup>2</sup>**

**Section 8.1d = Section 6.1 (portion of transfer that is not treated for destruction and is ultimately disposed of or otherwise released, other than disposal to landfills or UIC Class I Wells) + Section 6.2 (quantities associated with M codes M10, M41, M62, M66, M67, M73, M79, M82, M90, M94, and M99) - Section 8.8 (off-site disposal or other releases, other than disposal to landfills or UIC Class I Wells)<sup>2</sup>**

<sup>2</sup>§ 8.8 includes quantities of toxic chemicals disposed of or otherwise released on-site or managed as a waste off-site due to remedial actions, catastrophic events, or one-time events not associated with the production process. In each equation, the parenthetical following "Section 8.8" indicates which portion of § 8.8 is subtracted.

Some chemicals in addition to metals and metal category compounds might not be treated for destruction at a POTW. If you know that some or all of a chemical is not treated for destruction at the POTW, you should report that quantity in Section 8.1 (as indicated in the equations above) instead of Section 8.7 (which is the quantity treated off-site). In such cases, you may report using up to two decimal places.

Removal and destruction rates for toxic chemicals sent to POTWs, based on experimental and estimated data, can be found in Table VI.

**Sections 8.2 and 8.3.** These relate to an EPCRA Section 313 chemical or a mixture containing an EPCRA Section 313 chemical that is used for energy recovery on-site or is sent off-site for energy recovery, unless it is a commercially available fuel (e.g., fuel oil no. 6). For the purposes of reporting on Form R, reportable on-site and off-site energy recovery is the combustion of a waste stream containing an EPCRA Section 313 chemical when:

- (a) The combustion unit is integrated into an energy recovery system (i.e., industrial furnaces, industrial kilns, and boilers); and
- (b) The EPCRA Section 313 chemical is combustible and has a significant heating value (e.g., 5000 BTU)

Note: Metals and metal category compounds cannot be combusted for energy recovery. For metals and metal category compounds, you should enter NA in Sections 8.2 and 8.3.

Quantities used for energy recovery off-site that are reported in Section 8.8 are excluded from Section 8.3.

**Section 8.2 is not related to Sections 5 or 6**

**Section 8.3 = Section 6.2 (energy recovery) - Section 8.8 (off-site energy recovery)<sup>2</sup>**

**Sections 8.4 and 8.5.** These relate to an EPCRA Section 313 chemical in a waste that is recycled on-site or is sent off-site for recycling. Quantities recycled off-site that are reported in Section 8.8 are excluded from Section 8.5.

**Section 8.4 is not related to Sections 5 or 6**

## Instructions for Completing Part II of EPA Form R

### Example 20: Avoiding Double-Counting Quantities in Sections 8.1 through 8.7

5,000 pounds of an EPCRA Section 313 chemical enters a treatment operation. Three thousand pounds of the EPCRA Section 313 chemical exits the treatment operation and then enters a recycling operation. Five hundred pounds of the EPCRA Section 313 chemical are in residues from the recycling operation that is subsequently sent off-site to a landfill for disposal. These quantities would be reported as follows in Section 8:

Section 8.1c: 500 pounds disposed of  
Section 8.4: 2,500 pounds recycled  
Section 8.6: 2,000 pounds treated (5,000 that initially entered - 3,000 that subsequently entered recycling)

*To report that 5,000 pounds were treated, 3,000 pounds were recycled, and that 500 pounds were sent off-site for disposal would result in over-counting the quantities of EPCRA Section 313 chemical recycled, treated, and disposed of by 3,500 pounds.*

**Section 8.7 = Section 6.1 (portion of transfer that is ultimately treated) + Section 6.2 (treatment) - Section 8.8 (off-site treatment)**<sup>3</sup>

Some chemicals in addition to metals and metal category compounds might not be treated for destruction at a POTW. If you know that some or all of a chemical is not treated for destruction at the POTW, you should report that quantity in Section 8.1 instead of Section 8.7. Facilities should use their best readily available information to determine the final disposition of the toxic chemical sent to the POTW, and then distribute the amount reported in Section 6.1 among Sections 8.1c, 8.1d, and 8.7, as appropriate. Removal and destruction rates for toxic chemicals sent to POTWs, based on experimental and estimated data, can be found in Table VI.

**Section 8.5 = Section 6.2 (recycling) - Section 8.8 (off-site recycling)**<sup>3</sup>

**Section 8.6 and 8.7.** These relate to an EPCRA Section 313 chemical (except for most metals and metal category compounds) or a waste containing an EPCRA Section 313 chemical that is treated for destruction on-site or is sent to a POTW or other off-site location for treatment for destruction. Most metal and category compounds are not reported in this section because they cannot be destroyed (see Appendix B). Quantities treated off-site that are reported in Section 8.8 are excluded from Section 8.7.

**Section 8.6 is not related to Sections 5 or 6**

<sup>3</sup> § 8.8 includes quantities of toxic chemicals disposed of or otherwise released on-site or managed as a waste off-site due to remedial actions, catastrophic events, or one-time events not associated with the production process. In each equation, the parenthetical following "Section 8.8" indicates which portion of § 8.8 is subtracted.

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### **8.8 Non-Production-Related Waste**

In Section 8.8, enter the total quantity of the EPCRA Section 313 chemical disposed of or released directly into the environment or sent off-site for recycling, energy recovery, treatment, or disposal during the reporting year due to any of the following events:

- (1) remedial actions;
- (2) catastrophic events such as earthquakes, fires, or floods; or
- (3) other one-time events not associated with normal or routine production processes.

These quantities should not be included in Sections 8.1, 8.3, 8.5, or 8.7.

The purpose of this section is to separate quantities recycled, used for energy recovery, treated, or released (including disposals) that are associated with normal or routine production operations from those that are not. While all quantities released, recycled, combusted for energy recovery, or treated may ultimately be preventable, this section separates the quantities that are more likely to be reduced or eliminated by process oriented source reduction activities from those releases that are largely unpredictable and are less amenable to such source reduction activities. For example, spills that occur as a routine part of production operations and could be reduced or eliminated by improved handling, loading, or unloading procedures are included in the quantities reported in Section 8.1 through 8.7 as appropriate. A total loss of containment resulting from a tank rupture caused by a tornado would be included in the quantity reported in Section 8.8.

Similarly, the amount of an EPCRA Section 313 chemical cleaned up from spills resulting from normal operations during the reporting year would not be included in Section 8.8. However, the quantity of the reported EPCRA Section 313 chemical disposed of from a remedial action (e.g., RCRA corrective action) to clean up the environmental contamination resulting from past practices should be reported in Section 8.8 because they cannot currently be addressed by source reduction methods. A remedial action for purposes

of Section 8.8 is a waste cleanup (including RCRA and CERCLA operations) within the facility boundary. Most remedial activities involve collecting and treating contaminated material.

Also, releases caused by catastrophic events are to be incorporated into the quantity reported in Section 8.8. Such releases may be caused by natural disasters (e.g., hurricanes and earthquakes) or by large scale accidents (e.g., fires and explosions). In addition, releases due to other one-time events not associated with production (e.g., terrorist bombing) are to be included in Section 8.8. These amounts are generally unanticipated and cannot be addressed by routine process oriented accident prevention techniques. By checking your documentation for calculating estimates made for Part II, Section 5, "Quantity of the Toxic Chemical Entering Each Environmental Medium On-site," you may be able to identify disposal and release amounts from the above sources. Emergency notifications under CERCLA and EPCRA as well as accident histories required under the Clean Air Act may provide useful information. You should also check facility incident reports and maintenance records to identify one time or catastrophic events.

Note: While the information reported in Section 8.8 represents only remedial, catastrophic, or other one-time events not associated with production processes, Section 5 of Form R (on-site disposal and other releases to the environment) and Section 6 (off-site transfers for further waste management) must include all on-site disposal and other releases and transfers for disposal as appropriate, regardless of whether they arise from catastrophic, remedial, or routine process operations.

### **Avoid Double Counting in Sections 8.1 Through 8.8**

Do not double or multiple count quantities in Sections 8.1 through 8.8. The quantities reported in each of those sections should be mutually exclusive. In TRI-MEweb, any amounts that you designate as non-production-related-waste (Section 8.8) will be automatically excluded from production-related-waste (Sections 8.1-8.7).

## Instructions for Completing Part II of EPA Form R

### Example 21: Non-Production-Related Waste Managed (Quantity Released to the Environment or Transferred Off-Site as a Result of Remedial Actions, Catastrophic Events, or Other One-Time Events Not Associated with Production Processes).

A chemical manufacturer produces an EPCRA Section 313 chemical in a reactor that operates at low pressure. The reactants and the EPCRA Section 313 chemical product are piped in and out of the reactor at monitored and controlled temperatures. During normal operations, small amounts of fugitive emissions occur from the valves and flanges in the pipelines.

Due to a malfunction in the control panel (which is state-of-the-art and undergoes routine inspection and maintenance), the temperature and pressure in the reactor increase, the reactor ruptures, and the EPCRA Section 313 chemical is released. Because the malfunction could not be anticipated and, therefore, could not be reasonably addressed by specific source reduction activities, the amount released is included in Section 8.8. In this case, much of the EPCRA Section 313 chemical is released as a liquid and pools on the ground. It is estimated that 1,000 pounds of the EPCRA Section 313 chemical pooled on the ground and was subsequently collected and sent off-site for treatment. In addition, it is estimated that another 200 pounds of the EPCRA Section 313 chemical vaporized directly to the air from the rupture. The total amount reported in Section 8.8 is the 1,000 pounds that pooled on the ground (and subsequently sent off-site), plus the 200 pounds that vaporized into the air, a total of 1,200 pounds. The quantity sent off-site must also be reported in Section 6 (but not in Section 8.7) and the quantity that vaporized must be reported as a fugitive emission in Section 5 (but not in Section 8.1b).

### 8.9 Production Ratio or Activity Ratio

For Section 8.9, you must provide either a production or activity ratio and indicate which type of ratio you reported using the checkboxes provided. The production or activity ratio allows year-to-year changes in release and other waste management quantities to be viewed within the context of production. For example, your production ratio lets data users know whether your releases per unit of output have gone up or down.

#### What Variable is Used to Calculate The Production or Activity Ratio?

To calculate a production or activity ratio, you must first select the variable(s) on which the ratio will be based. In all cases, the production or activity\_ratio must be based on the variable(s) that best reflect the output or outcome of the process(es) in which the EPCRA Section 313 chemical is involved. Examples of production or activity variables selected by various industries can be found in Example 25. Instructions for calculating a production or activity ratio based on either a single variable or multiple variables can be found below.

#### Production Ratio

A production ratio is a ratio of reporting year production to prior year production. Calculate a production ratio when the chemical is involved in

production processes. The equation for production ratio is as follows:

$$\text{Production Ratio} = \frac{[\text{Production Variable}]_{\text{Current Year}}}{[\text{Production Variable}]_{\text{Prior Year}}}$$

A production ratio may be based on production levels for either the facility's end product or on the intermediate product of the process in which the chemical is manufactured, processed, or otherwise used. If an EPCRA Section 313 chemical is used in the production of refrigerators, for example, the production ratio would be based on the number of refrigerators produced. This is shown in Example 22 and in the sample equation below:

$$\text{Example P.R.} = \frac{\# \text{ of refrigerators produced}_{\text{Current Year}}}{\# \text{ of refrigerators produced}_{\text{Prior Year}}}$$

If the EPCRA Section 313 chemical is itself the final product, the production ratio would be based on the amount of the chemical manufactured. Generally, however, the production ratio would be based on a variable other than the quantity of the EPCRA Section 313 chemical manufactured, processed, or otherwise used.

#### Activity Ratio

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An activity ratio is also a ratio of current year to prior year values, but is reported when a chemical is involved in an activity not directly related to production or production levels. An activity ratio is appropriate if a chemical is used in an auxiliary activity such as cleaning or pollution control, for example, and is calculated as follows:

$$\text{Activity Ratio} = \frac{[\text{Activity Variable}]_{\text{Current Year}}}{[\text{Activity Variable}]_{\text{Prior Year}}}$$

In all cases, the variable used to calculate an activity ratio should represent the intended outcome of the activity in which the chemical is used or produced, not the inputs of throughputs for the activity. If the EPCRA Section 313 chemical is used to clean molds, for example, the activity ratio could be based on the number of cleanings or the number of molds cleaned. It would not be based on the usage of the EPCRA Section 313 chemical or the total volume of cleaning solution used. This is shown in Example 23 and in the sample equation below:

$$\text{Example A.R.} = \frac{\# \text{ of Molds Cleaned}_{\text{Current Year}}}{\# \text{ of Molds Cleaned}_{\text{Prior Year}}}$$

### Production or Activity Ratios Based on Multiple Variables

In some cases, your facility may use the same EPCRA Section 313 chemical in more than one process. If there is no single variable that adequately reflects the output or outcome of the process(es) in which the reported EPCRA Section 313 chemical is involved, a production or activity ratio can be calculated by weighting the different production or activity variables for the different processes in which the chemical is involved. The procedure for this calculation is described in Example 26.

If the reported value is based on both production and activity variables, you would report the final value as a “production ratio” if the production ratio(s) were weighted more heavily than the activity ratio(s) in the calculations (and as an “activity ratio” if the opposite were true).

### Reporting Tips:

- TRI-MEweb includes a production or activity ratio wizard to help you calculate your ratio automatically.
- The ratio must be reported to the nearest tenths or hundredths place (i.e., one or two digits to the right of the decimal point) for all EPCRA 313 chemicals, including PBT chemicals. A zero is not an acceptable response unless the calculated value is less than 0.005, which can be rounded to zero.
- If the manufacture, processing, or other use of the reported EPCRA Section 313 chemical began during the current reporting year, select NA as the production or activity ratio. Otherwise, you must enter a value even if your facility did not exceed a reporting threshold for the chemical in the previous reporting year.
- The ratio is not to be reported as a percent change between years (i.e., for a 10 percent increase, you would report the ratio 1.10, not 10% or 10). A production ratio of 1 indicates no change in production from the prior year.
- It is important to realize that if your facility reports more than one reported EPCRA Section 313 chemical, the production or activity ratio may vary for different chemicals if the chemicals are used in different processes with different outputs.
- Details regarding the method used to calculate the Production or Activity Ratio can be included in Section 9.1, “Additional Information.” This information will provide context for the production or activity ratio and may help TRI data users better understand changes in releases or other waste management quantities. In Example 22, the facility could report, “Used the number of refrigerators painted as the production variable, because our facility uses toluene to paint refrigerators” in order to provide more information in Section 9.1.



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### **Example 22: Determining a Production Ratio**

Your facility's only use of toluene is as a paint carrier for a painting operation. You painted 12,000 refrigerators in the current reporting year and 10,000 refrigerators during the preceding year. The production ratio for toluene in this case is 1.2 (12,000/10,000) because refrigerator production levels best reflect the output of the processes in which toluene is used.

A facility manufactures inorganic pigments, including titanium dioxide. Hydrochloric acid (acid aerosols) is produced as a waste byproduct during the production process. An appropriate production ratio for hydrochloric acid (acid aerosols) is the annual titanium dioxide production, not the amount of byproduct generated. If the facility produced 20,000 pounds of titanium dioxide during the reporting year and 26,000 pounds in the preceding year, the production ratio would be 0.77 (20,000/26,000).

### **Example 23: Determining an Activity Ratio**

Your facility manufactures organic dyes in a batch process. Different colors of dyes are manufactured, and between color changes, all equipment must be thoroughly cleaned with solvent containing glycol ethers to reduce color carryover. During the preceding year, the facility produced 2,000 pounds of yellow dye in January, 9,000 pounds of green dye for February through September, 2,000 pounds of red dye in November, and another 2,000 pounds of yellow dye in December. This adds up to a total of 15,000 pounds and four color changeovers. During the reporting year, the facility produced 10,000 pounds of green dye during the first half of the year and 10,000 pounds of red dye in the second half. If your facility uses glycol ethers in this cleaning process only, an activity ratio of 0.5 (based on two color changeovers for the reporting year divided by four changeovers for the preceding year) is more appropriate than a production ratio of 1.33 (based on 20,000 pounds of dye produced in the current year divided by 15,000 pounds in the preceding year). In this case, an activity ratio is more appropriate than a production ratio because the process in which the glycol ethers are used is not directly related to production or to production levels.

A facility that manufactures thermoplastic composite parts for aircraft uses toluene as a wipe solvent to clean molds. The solvent is stored in 55-gallon drums and is transferred to 1-gallon dispensers. The molds are cleaned on an as-needed basis that is not necessarily a function of the parts production rate. Operators cleaned 5,200 molds during the reporting year, but only cleaned 2,000 molds in the previous year. An activity ratio of 2.6 (5,200/2,000) represents the outcome of the activities involving toluene usage in the facility.

A facility manufactures surgical instruments and cleans the metal parts with 1,1,1-trichloromethane in a vapor degreaser. The degreasing unit is operated in a batch mode and the metal parts are cleaned according to an irregular schedule. The activity ratio can be based upon the total time the metal parts are in the degreasing operation. If the degreasing unit operated 3,900 hours during the reporting year and 3,000 hours the prior year, the activity ratio is 1.3 (3,900/3,000).

### **Example 24: "NA" is Entered Instead of a Production Ratio or Activity Ratio**

Your facility began production of semiconductor chips during this reporting year. Perchloroethylene is used as a cleaning solvent for this operation and this is the only use of the EPCRA Section 313 chemical in your facility. You would enter NA in Section 8.9 because you have no basis of comparison in the prior year for the purposes of developing the activity ratio.

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### **Example 25: Selecting a Production or Activity Variable**

The table below provides examples of production or activity variables used by facilities in various industries to calculate a production ratio or activity ratio.

<b>Industry</b>	<b>Sample Production / Activity Variable</b>
Agriculture, Construction, and Mining Machinery Manufacturing	Drill rigs produced
Cement and Concrete Product Manufacturing	Tons of clinker produced
Clay Product and Refractory Manufacturing	Tons of brick manufactured
Chemical and Allied Products Merchant Wholesalers	Total gallons of glycol ethers packaged
Coal Mining	Mine production in tons of coal
Fossil Fuel Electric Power Generation	Number of megawatt-hours of electricity produced
National Security and International Affairs	Man-days of training per year
Nitrogenous Fertilizer Manufacturing	Ammonium thiosulfate product produced (in tons)
Plastics Product Manufacturing	Pounds extruded
Synthetic Dye and Pigment Manufacturing	Number of color changeovers
Waste Treatment and Disposal	Tons of waste landfilled on-site
Petroleum Refineries	Gallons of gasoline repackaged

### **Example 26: Determining the Production Ratio Based on a Weighted Average**

At many facilities, a reported EPCRA Section 313 chemical is used in more than one production process. In these cases, a production ratio or activity ratio can be estimated by weighting the production ratio for each process based on the respective contribution of each process to the quantity of the reported EPCRA Section 313 chemical managed as waste (recycled, used for energy recovery, treated, or disposed of).

Your facility paints bicycles with paint containing toluene. Sixteen thousand bicycles were produced in the reporting year and 14,500 were produced in the prior year. There were no significant design modifications that changed the total surface area to be painted for each bike. The production ratio for bicycles is 1.1 (16,000/14,500). You estimate 12,500 pounds of toluene was managed as waste (recycled, used for energy recovery, treated, disposed of or released) as a result of bicycle production processes.

Your facility also uses toluene as a solvent in a glue that is used to make components and add-on equipment for the bicycles. Thirteen thousand components were manufactured in the reporting year as compared to 15,000 during the prior year. The production ratio for the components using toluene is 0.87 (13,000/15,000). You estimate 1,000 pounds of toluene was managed as waste as a result of components production processes. The reported production ratio can be calculated by weighting the ratios for the different variables based on the relative contribution each has to the total quantity of toluene managed as waste during the reporting year (13,500 pounds). The production ratio is calculated as follows:

$$\text{Production ratio} = 1.1 \times (12,500/13,500) + 0.87 \times (1,000/13,500) = 1.08$$

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### **8.10 Did Your Facility Engage in Any Newly Implemented Source Reduction Activities for This Chemical During the Reporting Year?**

Section 8.10 must be completed if a source reduction activity involving the reported EPCRA Section 313 chemical was newly implemented at your facility. An activity is considered newly implemented if it went into effect, in whole or in part, during this reporting year.

#### **What Is Source Reduction?**

Source reduction, as defined by the Pollution Prevention Act, means any practice that:

- Reduces the amount of any hazardous substance, pollutant, or contaminant entering any waste stream or otherwise released into the environment (including fugitive emissions) prior to recycling, energy recovery, treatment, or disposal; and
- Reduces the hazards to public health and the environment associated with the release of such substances, pollutants, or contaminants.

The term “source reduction” does not include any practice that alters the physical, chemical, or biological characteristics or the volume of a hazardous substance, pollutant, or contaminant through a process or activity that itself is not integral to and necessary for the production of a product or the providing of a service.

Source reduction activities include equipment or technology modifications, process or procedure modifications, reformulation or redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training, or inventory control.

#### **How Does Source Reduction Relate to the Quantities Reported in Sections 8.1-8.8?**

Source reduction activities reduce the amount of the reported EPCRA Section 313 chemical disposed of or otherwise released (as reported in Section 8.1), used for energy recovery (as reported in Sections 8.2–8.3), recycled (as reported in Sections 8.4–8.5), or treated (as reported in Sections 8.6–8.7). Recycling, energy recovery, and treatment are not themselves considered source reduction activities because these practices occur *after* the chemical has entered a waste stream.

The focus of the section includes only those activities that are applied to reduce routine or reasonably anticipated releases or other quantities of the reported EPCRA Section 313 chemical managed as waste). Thus, you do not report in this section any activities taken to reduce or eliminate the quantities reported in Section 8.8.

#### **Why Is Reporting on Source Reduction Activities Important?**

The Pollution Prevention Act established the national policy “that pollution should be prevented or reduced at the source whenever feasible...” Reporting on source reduction activities provides important information for assessing progress towards this goal.

To promote pollution prevention, EPA has increased the prominence and accessibility of the pollution prevention information reported in Sections 8.10 and 8.11 of the Form R. For example, companies reporting source reduction are featured in the annual [TRI National Analysis](#) report and the popular new [TRI P2 Search](#) tool. To learn more, visit: <http://www2.epa.gov/toxics-release-inventory-tri-program/pollution-prevention-p2-and-tri>.

#### **How Do I Report Source Reduction Activities and Methods?**

Instructions on how to report source reduction activities (as defined above) and the methods used to identify such activities are provided below.

#### ***TRI-MEweb***

- **If Your Facility Implemented Source Reduction Activities.** If your facility implemented a new source reduction activity for the reported EPCRA Section 313 chemical during the reporting year, report the activity or activities that were implemented by selecting the most relevant activity code(s) from the drop down list in TRI-MEweb (see W-codes listed below).

For each “Source Reduction Activity” reported, you must also enter one or more code(s) that correspond to the internal and external method(s) or information sources you used to identify the possibility for implementing a source reduction activity at your facility. If more than three methods were used to identify the source reduction activity, enter only the three

## Instructions for Completing Part II of EPA Form R

codes that contributed most to the decision to implement the activity.

For each source reduction code you enter in TRI-MEweb, a button to the right of the entry opens a text box that allows you to provide additional details on that source reduction practice. Similarly, to describe how each source reduction practice was identified, a button to the right of the entry opens a text box that allows you to enter additional information on the identification method(s) you selected. Optional additional information about source reduction provided via these text boxes is then added to the next section of the Form R (Section 8.11, Optional Pollution Prevention Information) preceded by the W- or T-code to which it relates.

- **If Your Facility Did Not Implement Source Reduction Activities.** If your facility did not implement any new source reduction activity for the reported EPCRA Section 313 chemical, check the “NA” box in Section 8.10. *TRI-MEweb* then provides a text box that you may use to provide information on any barriers your facility might be facing with regard to the implementation of source reduction activities. (This information is then added to your entry in Section 8.11; see Section 8.11 instructions for additional information on barriers to P2.)

### Hard copy Reporting

- **If Your Facility Implemented Source Reduction Activities.** If using a paper form (trade secret submissions only), source reduction activity codes must be entered in the first column of Sections 8.10.1 through 8.10.4. Next, indicate any methods to identify the reported source reduction activity using the T-codes provided below.

If you have fewer than four source reduction codes in Section 8.10, an NA should be placed in the first column of the first unused row to indicate the termination of the sequence. If all four rows are used, there is no need to terminate the sequence. If there are more than four source reduction codes, photocopy Page 5 of Form R as many times as necessary and then number the boxes consecutively for each source reduction activity. Enter NA when the sequence has

terminated, unless the sequence ends at 4, 8, 12, 16, etc.

- **If Your Facility Did Not Implement Source Reduction Activities.** If your facility did not implement any new source reduction activity for the reported EPCRA Section 313 chemical, check the “NA” box in Section 8.10.

### How Do I Report Estimated Annual Reduction?

For each “Source Reduction Activity” reported, you have the option to provide an estimate of the resulting reduction in the annual amount of the chemical managed as waste (i.e., released, recycled, treated, or used for energy recovery). The estimated annual reduction can be calculated as follows:

$$\frac{(B - A) \times 100\%}{B}$$

where:

A = estimated amount of the EPCRA Section 313 chemical to be managed as waste in the year after the source reduction activity has been implemented and

B = estimated amount of the EPCRA Section 313 chemical that would have been managed as waste had the source reduction activity not been implemented.

If you choose to complete this field, the reductions associated with your pollution prevention efforts will be featured on EPA’s website through the Pollution Prevention Search Tool at [www.epa.gov/tri/p2](http://www.epa.gov/tri/p2). The estimated annual reduction should be reported using the range codes listed beneath the source reduction method codes.

### Reporting Tips:

- This estimate is based on the facility’s best readily available information at the time the activity is reported and will not necessarily reflect the actual reduction once implementation of the activity is completed.
- The estimated annual reduction only accounts for the impact of the particular source reduction activity. For example, if production is expected to double, but chemical quantities are expected to remain constant (when they also would have doubled if not for the source reduction activity), then the estimated annual reduction for the activity is 50%.

## *Instructions for Completing Part II of EPA Form R*

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### **Source Reduction Activity Codes**

Source reduction activity codes are listed below. In recent years many facilities have implemented green chemistry and green engineering practices to prevent pollution. In order to more closely represent these practices, EPA has developed six new source reduction codes. These codes are represented as: W15; W43; W50; W56; W57; and W84 and are provided in the list of source reductions below. Scenarios as to when these codes should be used are provided in Example 28.

### **Good Operating Practices**

- W13 Improved maintenance scheduling, record keeping, or procedures
- W14 Changed production schedule to minimize equipment and feedstock changeovers
- W15 Introduced in-line product quality monitoring or other process analysis system
- W19 Other changes made in operating practices

### **Inventory Control**

- W21 Instituted procedures to ensure that materials do not stay in inventory beyond shelf-life
- W22 Began to test outdated material — continue to use if still effective
- W23 Eliminated shelf-life requirements for stable materials
- W24 Instituted better labeling procedures
- W25 Instituted clearinghouse to exchange materials that would otherwise be discarded
- W29 Other changes made in inventory control

### **Spill and Leak Prevention**

- W31 Improved storage or stacking procedures
- W32 Improved procedures for loading, unloading, and transfer operations
- W33 Installed overflow alarms or automatic shut-off valves
- W35 Installed vapor recovery systems
- W36 Implemented inspection or monitoring program of potential spill or leak sources
- W39 Other changes made in spill and leak prevention

### **Raw Material Modifications**

- W41 Increased purity of raw materials
- W42 Substituted raw materials
- W43 Substituted a feedstock or reagent chemical with a different chemical
- W49 Other raw material modifications made

### **Process Modifications**

- W50 Optimized reaction conditions or otherwise increased efficiency of synthesis
- W51 Instituted re-circulation within a process
- W52 Modified equipment, layout, or piping
- W53 Used a different process catalyst
- W54 Instituted better controls on operating bulk containers to minimize discarding of empty containers
- W55 Changed from small volume containers to bulk containers to minimize discarding of empty containers
- W56 Reduced or eliminated use of an organic solvent
- W57 Used biotechnology in manufacturing process
- W58 Other process modifications made

### **Cleaning and Degreasing**

- W59 Modified stripping/cleaning equipment
- W60 Changed to mechanical stripping/cleaning devices (from solvents or other materials)
- W61 Changed to aqueous cleaners (from solvents or other materials)
- W63 Modified containment procedures for cleaning units
- W64 Improved draining procedures
- W65 Redesigned parts racks to reduce drag out
- W66 Modified or installed rinse systems
- W67 Improved rinse equipment design
- W68 Improved rinse equipment operation
- W71 Other cleaning and degreasing modifications made

### **Surface Preparation and Finishing**

- W72 Modified spray systems or equipment
- W73 Substituted coating materials used
- W74 Improved application techniques
- W75 Changed from spray to other system
- W78 Other surface preparation and finishing modifications made

### **Product Modifications**

- W81 Changed product specifications
- W82 Modified design or composition of product
- W83 Modified packaging
- W84 Developed a new chemical product to replace a previous chemical product
- W89 Other product modifications made

### **Methods to Identify Source Reduction Activities**

***Instructions for Completing Part II of EPA Form R***

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T01	Internal pollution prevention opportunity audit(s)	T10	Vendor assistance
T02	External pollution prevention opportunity audit(s)	T11	Other
T03	Materials balance audits	<b>Estimated Annual Reduction Range Codes</b>	
T04	Participative team management	R1 =	100% (elimination of the chemical)
T05	Employee recommendation (independent of a formal company program)	R2 =	greater than or equal to 50%, but less than 100%
T06	Employee recommendation (under a formal company program)	R3 =	greater than or equal to 25%, but less than 50%
T07	State government technical assistance program	R4 =	greater than or equal 15%, but less than to 25%
T08	Federal government technical assistance program	R5 =	greater than or equal 5%, but less than to 15%
T09	Trade association/industry technical assistance program	R6 =	greater than 0%, but less than 5%

## Instructions for Completing Part II of EPA Form R

### Example 27: Source Reduction

A facility assembles and paints furniture. Both the glue used to assemble the furniture and the paints contain EPCRA Section 313 chemicals. By examining the gluing process, the facility discovered that a new drum of glue is opened at the beginning of each shift, whether the old drum is empty or not. By adding a mechanism that prevents the drum from being changed before it is empty, the need for disposal of the glue is eliminated at the source. As a result, this activity is considered source reduction.

The painting process at this facility generates a solvent waste that contains an EPCRA Section 313 chemical that is collected and recovered. The recovered solvent is used to clean the painting equipment. The recycling activity does not reduce the amount of EPCRA Section 313 chemical recycled, and therefore is not considered a source reduction activity.

### Example 28: Green Chemistry

Six codes that describe green chemistry and green engineering practices were first added to the list of source reduction activity codes in Reporting Year 2012. These codes are listed below with a description of when to use each to report a green chemistry or engineering activity.

- W15 *Introduced in-line product quality monitoring or other process analysis system.* Select this code if the introduction of such a system led to a reduction in the amount of the EPCRA Section 313 chemical generated as waste.
- W43 *Substituted a feedstock or reagent chemical with a different chemical.* Select this code if the EPCRA Section 313 chemical was a feedstock or reagent chemical and you replaced it (in whole or in part) with a different chemical.
- For raw material substitutions not at the level of the individual chemical (e.g., the substitution of natural gas for coal), select instead W42 *Substituted raw materials*.
  - If use of a feedstock or reagent chemical was reduced or eliminated because of a change in the final product, select instead one of the codes listed under *Product Modifications*.
- W50 *Optimized reaction conditions or otherwise increased efficiency of synthesis.* Select this code if the amount of the EPCRA Section 313 chemical generated as waste was reduced by increasing the overall efficiency of the synthesis.
- If efficiency of syntheses was improved by using of a different catalyst, select instead W53 *Used a different process catalyst*.
- W56 *Reduced or eliminated use of an organic solvent.* Select this code if the EPCRA Section 313 chemical was used as a solvent in the process and the process was modified such that the EPCRA Section 313 chemical was either replaced or no longer used in as large a quantity.
- W57 *Used biotechnology in manufacturing process.* Select this code if the use of biotechnology in the process reduced or eliminated the use of the TRI chemical.
- W84 *Developed a new chemical product to replace previous chemical product.* Select this code if the EPCRA Section 313 chemical had been produced at the facility but was replaced it (in whole or in part) with the production of a different chemical or chemicals.

## Instructions for Completing Part II of EPA Form R

### 8.11 Optional Pollution Prevention Information

In Section 8.11, you have the opportunity to provide more detail about activities your facility undertook to reduce releases of the EPCRA Section 313 chemical, including source reduction, recycling, energy recovery, treatment or other pollution controls. EPA encourages you to provide detail in Section 8.11, as it offers your organization the opportunity to showcase its achievements in preventing pollution.

If you are using TRI-MEweb to submit your report, you can use the provided text boxes to describe your source reduction, recycling, or pollution control activities. If you are filing by paper (trade secret submissions only), you may provide a description in the box provided on the Form R.

While EPA welcomes submissions about recycling and pollution control activities, the Agency is most interested in collecting information about innovative and effective source reduction activities, such as green chemistry or green engineering practices. In addition, the Agency wishes to encourage reporters to provide enough detailed information about their most effective source reduction activities to spur other facilities to adopt similar practices, as well as to inform the public about such activities being implemented in their communities.

To encourage submissions with additional pollution prevention information, EPA is increasing the prominence and accessibility of this information. Visit <http://www2.epa.gov/toxics-release-inventory-tri-program/pollution-prevention-p2-and-tri> to learn how to access this information (e.g., through the [P2 Search](#) tool) and to view examples of optional pollution prevention information highlighted in EPA's annual TRI National Analysis report.

The following tips can help you provide meaningful additional information.

Be Specific:

- Which processes and products were affected?
- Which technologies and materials were used?
- Which release (to air, water land) or waste management quantities changed?
- Were there other benefits (e.g., costs, product quality?)

- Who provided the idea or assisted with implementation?
- Why did you implement this activity?

Enter useful URLs:

- For equipment manufacturers
- To other information sources related to the activity described

A tip-sheet with additional guidance and sample entries can be found at [http://www2.epa.gov/sites/production/files/documents/tri\\_p2\\_tipsheet.pdf](http://www2.epa.gov/sites/production/files/documents/tri_p2_tipsheet.pdf). If you wish to provide additional information that is not related to pollution prevention or other environmentally friendly practices, use Section 9.1.

When completing this section in TRI-MEweb, you may indicate that you have submitted information pertaining to one or more of the following topics by checking a box next to the topic to which your information pertains:

- Source Reduction
- Recycling
- Energy Recovery
- Waste Treatment
- General Environmental Management
- Methods for Identifying P2 Opportunities
- Ways P2 Was Incorporated in Original Process Design

If you do so, each topic you have selected will be included in your Section 8.11 entry, followed by the information you have provided about that topic. Using these checkboxes will facilitate searches for information about P2 and other environmentally-friendly practices by users of the TRI database.

#### **Barriers to Implementing Pollution Prevention Activities**

You may also provide details on any barriers your facility faces in implementing additional source reduction, recycling or pollution control activities. If you choose to provide this information, EPA encourages you to select one or more of the following barrier categories from the checklist provided in TRI-MEweb and describe specifically how one of these barrier categories applies to your facility:



## *Instructions for Completing Part II of EPA Form R*

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1. Insufficient capital to install new source reduction equipment or implement new source reduction activities/initiatives.
2. Require technical information on pollution prevention techniques applicable to specific production processes.
3. Concern that product quality may decline as a result of source reduction.
4. Source reduction activities were implemented but were unsuccessful.
5. Specific regulatory/permit burdens
6. Pollution prevention previously implemented- additional reduction does not appear technically or economically feasible.
7. No known substitutes or alternative technologies.
8. Other barriers.

Each category you select in TRI-MEweb will be included in your Section 8.11 entry, followed by the additional details you provided on that topic (if any).

EPA believes this information is valuable in giving a full picture of the source reduction activities your facility engages in and what barriers you face in the implementation of source reduction activities. EPA also believes this information may allow for an exchange between those that have knowledge of source reduction practices, such as the EPA P2 Program, and those that are seeking additional help. In addition, it will better enable EPA to identify those technological areas for which EPA can support basic research to identify alternative technologies that are less polluting.

### **9.1 Miscellaneous, Optional, and Additional Information for Your Form R Report**

Your facility may provide additional information pertaining to any portion of your Form R submission in the box provided in the free text box provided in TRI-MEweb or on the hard copy form (trade secret submissions only). Your submissions

to Section 9.1 regarding miscellaneous, additional, optional information may provide the Agency and/or the public with useful data that helps explain why your facility submitted data in one or more data elements that might appear unusual or inconsistent with previous TRI Form R submissions or with other data supplied by your facility during this reporting year. Such additional data may help EPA reduce the need for additional data quality control as well as additional TRI-related enforcement and compliance efforts. **Do not submit information you consider to be CBI or otherwise protected on your Form R.**

When completing this section in TRI-MEweb, you may indicate that you have submitted information pertaining to one or more of the following topics by checking a box next to the topic to which your information pertains:

- Changes in Production Levels
- Calculation Methods, e.g., Emission Factors
- One-time or Intermittent Events Impacting Reported Quantities
- Issues or Difficulties Encountered in Submitting Form
- Other Regulatory Requirements Related to This Chemical
- No TRI Reports Expected for This TRIFID Next Year
- No TRI Report Expected for This Chemical Next Year

If you do so, each topic you have selected will be included in your Section 8.11 entry, followed by the information you have provided about that topic (if any). Using these checkboxes will ensure that EPA and other TRI data users understand the factors that have contributed to any apparent data quality issues. Note that if you select one of the last two topics above, it is helpful to include the reason you will not be submitting a report next year (e.g., facility closure, move, temporary shutdown, etc.).

## **D. Instructions for Completing Form R Schedule 1 (Dioxin and Dioxin-like Compounds)**

### ***D.1 What is the Form R Schedule 1?***

The Form R Schedule 1 is an adjunct to the Form R that mirrors the data elements from Form R Part II Chemical-Specific Information sections 5, 6, and 8 (current year only) and requires the reporting of the individual grams data for each member of the dioxin and dioxin-like compounds category present. Facilities that file Form R reports for the dioxin and dioxin-like compounds category are required to determine if they have any of the information required by the Form R Schedule 1. Facilities that have any of the information required by Form R Schedule 1 must submit individual member data via the Form R Schedule 1 in addition to the Form R.

### ***D.2 Who is required to file a Form R Schedule 1?***

Only facilities that file reports for the dioxin and dioxin-like compounds category may be required to file a Form R Schedule 1. Facilities that have any of the data required by Form R Schedule 1 for the individual members of the dioxin and dioxin-like compounds category must submit a Form R Schedule 1, in addition to the Form R. EPA notes that dioxin and dioxin-like compounds are not measured as a total quantity; the measurements are based on the individual compounds within the category. Emission factors for dioxin and dioxin-like compounds are also based on emission factors for the individual compounds within the category. [EPA's guidance document for dioxin and dioxin-like compounds](#) (Emergency Planning And Community Right-To-Know Act - Section 313: Guidance for Reporting Toxic Chemicals within the Dioxin and Dioxin-like Compounds Category, EPA-745-B-00-021, December 2000) includes tables that contain the emission factors for the individual members of the dioxin and dioxin-like compounds category. Since measured data and emission factor

data are based upon data for the individual members of the dioxin and dioxin-like compounds category, the information required by Form R Schedule 1 should be available to facilities that file Form R reports for the dioxin and dioxin-like compounds category.

### ***D.3 What information is reported on the Form R Schedule 1?***

The only data reported on the Form R Schedule 1 is the mass quantity information required in sections 5, 6, and 8 (current year only) of the Form R. All of the other information required in sections 5, 6, and 8 of the Form R (off-site location names, stream or water body names, etc.) would be the same so this information is not duplicated on Form R Schedule 1. For example, if a facility reported 5.3306 grams on Form R Section 5.1 for fugitive or non-point air emissions for the dioxin and dioxin-like compounds category then the facility would report on the Form R Schedule 1 the grams data for each individual member of the category that contributed to the 5.3306 gram total. The sum of the gram quantities reported for each individual member of the category should equal the total gram quantity reported for the category on Form R for each data element (see examples in Figure 7). The NA box has the same meaning on Form R Schedule 1 as it does on the Form R and should only be marked if it is marked on the Form R.

It is extremely important that facilities enter their grams data for the individual members of the category based on the order shown in the **Individual Members of the Dioxin and Dioxin-like Compounds Category** table on page 87. This information will be used to calculate toxic equivalency values using toxic equivalency factors that are specific to each member of the category. As with reporting on the Form R, facilities should report on the Form R Schedule 1 to the level of accuracy that their data supports, up to seven digits to the right of the decimal. EPA's reporting software and data management systems support data precision to seven digits to the right of the decimal.

**Instructions for Completing Form R Schedule 1 (Dioxin and Dioxin-like Compounds)**

**Form R Section 5 Example**

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ON-SITE				
		A. Total Release (pounds/year*) (Enter a range code** or estimate)	B. Basis of Estimate (Enter code)	C. Percent from Stormwater
5.1	Fugitive or non-point air emissions	NA <input type="checkbox"/>	5.3306	M2

**Form R Schedule 1 Section 5 Example**

SECTION 5. QUANTITY OF DIOXIN AND DIOXIN-LIKE COMPOUNDS ENTERING EACH ENVIRONMENTAL MEDIUM ON-SITE							
	5.1	NA	5.2	NA	5.3 Discharges to receiving streams or water bodies (Enter data for one stream or water body per box) NA <input type="checkbox"/>		
	Fugitive or non-point air emissions		Stack or point air emissions		5.3.1	5.3.2	5.3.3
D. Mass (grams) of each compound in the category (1-17)	1	0.0035					
	2	0.0059					
	3	0.0071					
	4	0.0008					
	5	0.0065					
	6	0.0923					
	7	0.5720					
	8	0.0723					
	9	0.0695					
	10	0.0399					
	11	0.3562					
	12	0.1309					
	13	0.0132					
	14	0.0815					
	15	1.4625					
	16	0.3126					
	17	2.1039					

If additional pages of Section 5.3 are attached, indicate the total number of pages in this box

and indicate the Section 5.3 page number in this box  (Example: 1, 2, 3, etc.)

The Form R Schedule 1 provides boxes for recording the gram quantities for all 17 individual members of the dioxin and dioxin-like compounds category. The boxes on the Form R Schedule 1 for each release type are divided into 17 boxes. Each of the boxes (1-17) corresponds to the individual members of the dioxin category as presented in Table I.

**Figure 7. Hypothetical Form R, Section 5.1 and Form R Schedule 1, Section 5.1**

## Instructions for Completing Form R Schedule 1 (Dioxin and Dioxin-like Compounds)

### Individual Members of the Dioxin and Dioxin-like Compounds Category

Box #	CAS#	Chemical Name	Abbreviation
1.	01746-01-6	2,3,7,8-Tetrachlorodibenzo- p-dioxin	2,3,7,8-TCDD
2.	40321-76-4	1,2,3,7,8-Pentachlorodibenzo- p-dioxin	1,2,3,7,8-PeCDD
3.	39227-28-6	1,2,3,4,7,8-Hexachlorodibenzo- p-dioxin	1,2,3,4,7,8-HxCDD
4.	57653-85-7	1,2,3,6,7,8-Hexachlorodibenzo- p-dioxin	1,2,3,6,7,8-HxCDD
5.	19408-74-3	1,2,3,7,8,9-Hexachlorodibenzo- p-dioxin	1,2,3,7,8,9-HxCDD
6.	35822-46-9	1,2,3,4,6,7,8-Heptachlorodibenzo- p-dioxin	1,2,3,4,6,7,8-HpCDD
7.	03268-87-9	1,2,3,4,6,7,8,9-Octachlorodibenzo- p-dioxin	1,2,3,4,6,7,8,9-OCDD
8.	51207-31-9	2,3,7,8-Tetrachlorodibenzofuran	2,3,7,8-TCDF
9.	57117-41-6	1,2,3,7,8-Pentachlorodibenzofuran	1,2,3,7,8-PeCDF
10.	57117-31-4	2,3,4,7,8-Pentachlorodibenzofuran	2,3,4,7,8-PeCDF
11.	70648-26-9	1,2,3,4,7,8-Hexachlorodibenzofuran	1,2,3,4,7,8-HxCDF
12.	57117-44-9	1,2,3,6,7,8-Hexachlorodibenzofuran	1,2,3,6,7,8-HxCDF
13.	72918-21-9	1,2,3,7,8,9-Hexachlorodibenzofuran	1,2,3,7,8,9-HxCDF
14.	60851-34-5	2,3,4,6,7,8-Hexachlorodibenzofuran	2,3,4,6,7,8-HxCDF
15.	67562-39-4	1,2,3,4,6,7,8-Heptachlorodibenzofuran	1,2,3,4,6,7,8-HpCDF
16.	55673-89-7	1,2,3,4,7,8,9-Heptachlorodibenzofuran	1,2,3,4,7,8,9-HpCDF
17.	39001-02-0	1,2,3,4,6,7,8,9-Octachlorodibenzofuran	1,2,3,4,6,7,8,9-OCDF

### D.4 How do I report Form R Schedule 1 Data?

The Electronic Reporting of Toxics Release Inventory Data rule requires that all Dioxin and Dioxin-like Compound data must be submitted electronically via TRI-MEweb (except for reports containing trade secrets, which must be submitted on paper). For each data element in Sections 5, 6, and 8 (current year only), TRI-MEweb has a clickable button labeled “**Schedule 1**” that loads a separate page ‘Release/Transfer Quantities by Category Member.’ In this page, you can enter the individual quantities for each category member. TRI-MEweb will automatically calculate the category total. If any releases or transfer were due to non-production-related wastes (see Chapter 2, Part

II, Section 8.8), enter those values on the same page. If your facility does not have individual member data, you can select the checkbox labeled “I would like to enter total grams of Dioxin and Dioxin-like Compounds” and the “**Next**” button to enter total quantities.

When you have finished entering all of your data for dioxin, use the “**Validate**” tab’s “Data Quality Analyses” page to view a Dioxin Toxic Equivalency (TEQ) Calculation report. This report multiplies the quantity for each individual category member by its toxic equivalency factor (TEF) to determine the total TEQ value for each section of the Form R Schedule 1 for which data were provided.

***Facility Eligibility Determination for Alternate Threshold  
and for Reporting on TRI Form A Certification Statement***

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**E. Facility Eligibility  
Determination for Alternate  
Threshold and for  
Reporting on TRI Form A  
Certification Statement**

This section will help to determine whether you can submit the simplified Form A Certification Statement (hereafter referred to as Form A). The criteria are based on the total annual reportable amount of the listed chemical or chemical category and the amount manufactured, processed, or otherwise used. Note that, effective in Reporting Year 2008, the TRI Burden Reduction Rule has been voided by Congress. The criterion for using Form A has returned to what they were prior to Reporting Year 2006. The criteria are explained below. For more information about the final rule, see the TRI homepage at: <http://www2.epa.gov/toxics-release-inventory-tri-program/tri-laws-rulemakings-and-notice>.

***E.1 Alternate Threshold***

On November 30, 1994, EPA published a final rule (59 FR 61488) that provides qualifying facilities an alternate threshold of 1 million pounds. Eligible facilities wishing to take advantage of this option may certify on a simplified two-page form referred to as Form A Certification Statement and do not have to use Form R. The "TRI Alternate Threshold for Facilities with Low Annual Reportable Amounts," provides facilities otherwise meeting EPCRA section 313 reporting thresholds the option of certifying on Form A provided that they do not exceed 500 pounds for the total annual reportable amount (defined below) for that chemical, and that their amounts manufactured or processed or otherwise used do not exceed one-million pounds. As with determining section 313 reporting thresholds, amounts manufactured, processed, or otherwise used are to be considered independently. This modification does not apply to forms being submitted on or before July 1, 1995 (covering the 1994 reporting year). If you fill out a Form A for an EPCRA section 313 chemical, do not fill out a Form R for that same chemical.

However, there is an exception to the alternate threshold rule described in the preceding paragraph. All PBT chemicals (except certain instances of

reporting lead in stainless steel, brass or bronze alloys) are excluded from eligibility for the alternate threshold.

***E.2 What is the Form A Certification Statement?***

The Form A, which is described as the "certification statement" in 59 FR 61488, is intended as a means to reduce the compliance burden associated with EPCRA section 313. If a facility chooses to use Form A as a substitute for Form R for any eligible chemical, it must be submitted on an annual basis. Facilities wishing to take advantage of this burden reducing option may only submit Form A for chemicals that meet the conditions described in section E.1, Alternate Threshold, and should not submit a Form R to the TRI Data Processing Center for the same chemicals. The information submitted on the Form A includes facility identification information and the chemical or chemical category identity. The information submitted on the Form A will appear in the TRI data base in the same manner that information submitted on Form R appears. An approved Form A can be accessed via TRI-MEweb or from the EPA TRI website.

***E.3 What Is the Annual Reportable Amount (ARA)?***

For the purpose of this optional reporting modification, the annual reportable amount (ARA) is equal to the combined total quantities released at the facility (including disposed of within the facility), treated at the facility (as represented by amounts destroyed or converted by treatment processes), recovered at the facility as a result of recycling operations, combusted for the purpose of energy recovery at the facility, and amounts transferred from the facility to off-site locations for the purpose of recycling, energy recovery, treatment, and/or disposal. These quantities correspond to the sum of amounts reportable for data elements on EPA Form R (EPA Form 9350-1; Rev.10/09) as Part II column B of section 8, data elements 8.1 (quantity released), 8.2 (quantity used for energy recovery on-site), 8.3 (quantity used for energy recovery off-site), 8.4 (quantity recycled onsite), 8.5 (quantity recycled off-site), 8.6 (quantity treated on-site), and 8.7 (quantity treated off-site).

## ***Facility Eligibility Determination for Alternate Threshold and for Reporting on TRI Form A Certification Statement***

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### ***E.4 Recordkeeping***

Each owner or operator who determines that they are eligible, and wishes to apply the alternate threshold to a particular chemical, must retain records substantiating this determination for a period of three years from the date of the submission of the Form A. These records must include sufficient documentation to support calculations as well as the calculations made by the facility that confirm their eligibility for each chemical for which the alternate threshold was applied.

A facility that fits within the category description, and manufactures, processes or otherwise uses no more than one million pounds of an EPCRA Section 313 chemical annually, and whose owner/operator elects to take advantage of the alternate threshold, is not considered an EPCRA Section 313 covered facility for that chemical for the purpose of submitting a Form R. This determination may provide further regulatory relief from other federal or state regulations that apply to facilities on the basis of their EPCRA Section 313 reporting status. A facility will need to reference other applicable regulations to determine if their actual requirements may be affected by this reporting modification.

### ***E.5 Multi-establishment Facilities***

For the purposes of using Form A, the facility must also make its determination based upon the entire facility's operations including all of its establishments (see 59 FR 61488 for greater detail). If the facility as a whole is able to take advantage of the alternate threshold, a single Form A is required. The eligibility to submit a Form A must be made on a whole facility determination. Thus, all of the information necessary to make the determination must be assembled to the facility level.

### ***E.6 Trade Secrets***

When making a trade secret claim on a Form A submission, EPA is requiring that a facility submit a unique Form A for each EPCRA Section 313 chemical meeting the conditions of the alternate threshold. Facilities may assert a trade secrecy claim for a chemical identity on the Form A as on the Form R. Reports submitted on a per chemical basis protect against the disclosure of trade secrets. Form As with trade secrecy claims, like Form Rs with similar claims, will be separately handled upon

receipt to protect against disclosure. Commingling trade secret chemical identities with non-trade secret chemical identities on the same submission increases the risk of disclosure.

**Do not submit  
trade secret reports electronically.**

### ***E.7 Metals and Metal Category Compounds***

For metal category compounds, the amount applied toward the ARA is the amount of parent metal waste that is reported on Form R, but the thresholds apply to the amount of metal category compounds manufactured, processed, or otherwise used. For Form A certification involving both listed parent metals and associated metal compounds, the one million pound alternate threshold must be applied separately to the listed parent metal and the associated metal compound(s). Threshold determinations must be made independently for each because they are separately listed EPCRA Section 313 chemicals.

- If the threshold is exceeded for the listed parent metal but not the associated metal category compounds, then the releases of metal reported on Form R for the parent metal need not include the releases from the metal category compounds.
- If both the parent metal and the associated metal compounds exceed the alternate threshold, then the facility has the option of filing one Form R for both, using the metal category compound name and reporting total releases based on parent metal content.
- If neither the parent metal nor the associated metal compounds exceed the alternate threshold, then the facility must use a separate listing on Form A for each, since the reporting thresholds must be applied to each listed parent metal and all compounds in the associated compound category. EPA believes it is appropriate to make the distinction between filing the Form R and Form A because the Form R accounts for amounts of metal released or otherwise managed and Form A verifies that the alternate threshold for each listed chemical or chemical category has not been exceeded.

***Facility Eligibility Determination for Alternate Threshold  
and for Reporting on TRI Form A Certification Statement***

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Similarly, separate listings on Form A must be submitted for all other listed chemicals even if EPA allows one listing on Form R to be filed for two or more listed chemicals (e.g., o-xylene, p-xylene and xylene (mixed isomers)). For example, if a facility processes in three separate process streams, xylene (mixed isomers), o-xylene, and p-xylene, and exceeds the conditions of the alternate threshold for each of these listed substances, the facility may combine the appropriate information on the o-xylene, p-xylene, and xylene (mixed isomers) into one Form R, but cannot combine the reports into one listing on Form A.

Facilities that process o-xylene, p-xylene, and xylene (mixed isomers) in separate process streams and do not exceed the conditions of the alternate threshold for one or more of the compounds may submit a separate Form A for each of the forms of xylene meeting the alternate threshold and report on Form R for those forms that do not. Similar to reporting on the parent metals and their associated category compounds described above, facilities that separately process all types (i.e., isomers) of xylene with individual activity levels within the conditions of the alternate threshold should file a separate Form A for each type of xylene.

Beginning with the 1998 reporting year, facilities may enter as many chemicals as are eligible on a single Form A Certification Statement.

## **F. Instructions for Completing TRI Form A Certification Statement**

The following instructions provide information on how to enter data on a Form A.

### **Part I. Facility Identification Information**

#### **Section 1. Reporting Year**

The reporting year is the calendar year to which the reported information applies, not the year in which you are submitting the report. Information for the 2014 reporting year must be submitted on or before July 1, 2015.

#### **Section 2. Trade Secret Information**

Trade secret submission is not supported by TRI-MEweb. As such, the following sections are not to be completed by TRI-MEweb users. These sections reflect steps performed by trade secret filers only.

##### **2.1 Are you claiming the EPCRA Section 313 chemical identified on Page 3 a trade secret?**

If facilities wish to report more than one eligible chemical on the same Form A, then they are not able to make trade secrecy claims. Any trade secrecy claims should be made on a separate form, and then the process is the same as using the Form R and as described in the following instructions.

Answer this question only after you have completed the rest of the report. The specific identity of the EPCRA Section 313 chemical being reported in Part II, Section 1 may be designated as a trade secret. If you are making a trade secret claim, mark “yes” and proceed to Section 2.2. Only check “yes” if you manufacture, process, or otherwise use the EPCRA Section 313 chemical whose identity is a trade secret. (See Section A.3 of these instructions for specific information on trade secrecy claims.) If you checked “no,” you should submit your non-trade secret form data electronically using TRI-MEweb.

##### **2.2 If “yes” in 2.1, is this copy sanitized or unsanitized?**

Answer this question only after you have completed the rest of the report. Check “sanitized” if this copy of the report is the public version that does not

contain the EPCRA Section 313 chemical identity but does contain a generic name that is structurally descriptive in its place, and if you have claimed the EPCRA Section 313 chemical identity trade secret in Part I, Section 2.1. Otherwise, check “unsanitized.”

#### **Section 3. Certification**

The Form A Certification Statement must be signed by a senior official with management responsibility for the person (or persons) completing the form. A senior management official must certify the accuracy and completeness of the information reported on the form by signing and dating the Form A. Unlike the certification statement contained on Form R, the certification statement provided on the Alternate Threshold Form A pertains to the facility’s eligibility of having met the conditions as described in 40 CFR Section 372.27.

Electronic certification of completed forms prepared using TRI-MEweb is performed by certifying officials who have signed an Electronic Signature Agreement (ESA) and TRIFID Certification Agreement. For more information regarding certification of forms, see Section A.2.

#### **Section 4. Facility Identification**

##### **4.1 Facility Name, Location, TRI Facility Identification Number and Tribal Country Name**

Enter the full name that the facility presents to the public and its customers in doing business (e.g., the name that appears on invoices, signs, and other official business documents). Do not use a nickname for the facility (e.g., Main Street Plant) unless that is the legal name of the facility under which it does business. Also enter the physical street address, mailing address, city, county, three digit BIA code, if applicable, state, and ZIP code in the space provided. The street address provided must be the location where the EPCRA Section 313 chemicals are manufactured, processed, or otherwise used. You may not use PO Box as a facility address. If your mailing address and street address are the same, you should enter NA in the space for the mailing address. If the mailing address is outside of the US, include the FIPS country code, which may be found in Table IV.

If your facility is not in a county, put the name of your city, district (for example, District of



## *Instructions for Completing TRI Form A Certification Statement*

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Columbia), or parish (if you are in Louisiana) in the county block of the Form R and Form A as well as in the county field of TRI-MEweb. “NA” or “None” are not acceptable entries. TRI-MEweb provides a drop-down menu for the county name, including city districts and parish names.

If your facility is located on Indian country as defined by 18 USC §1151 you must enter the three digit Bureau of Indian Affairs (BIA) tribal code in the “City/County/Tribe/State/ZIP code” field. The BIA tribal codes are listed in Table V of the RFI. Facilities using TRI-MEweb to complete their forms will be asked if they are located within a tribe’s Indian country and, upon answering “yes”, be taken to a look-up table to determine the correct BIA code.

If your facility is not located (overwhelming majority of TRI facilities are not in Indian Country) in Indian country as defined by 18 USC §1151 you must enter only the city, county (as applicable), state and zip code. Facilities filing a trade secret paper form should leave a blank in the BIA field if the facility is not located within tribal boundaries. Facilities using TRI-MEweb to complete their forms will be required to check a specific checkbox if they are located within tribal lands and if they do not check that checkbox.

### **Location information for a facility that has previously submitted data to EPA.**

If your facility has submitted a Form R or A in previous reporting years, a TRI Facility Identification Number (TRIFID) has already been assigned to your facility. If you do not know your facility’s information used in prior years submissions, contact your Regional TRI Program representative, or utilize Envirofacts on the Web to look up the address, facility name, or TRIFID at: <http://www.epa.gov/enviro>.

**Hard copy paper Form A (trade secret submissions only):** Enter your TRIFID in Part I, Section 4.1.

**TRI-MEweb:** If you have previously submitted data for your facility using TRI-MEweb, the facility information including TRIFID remains with your profile. If you have not submitted using TRI-MEweb, then you can add your facility to your profile using the 6-digit access key, which is e-mailed to all technical contacts, preparers, and certifying officials at facilities reporting for the prior

year, or by submitting the TRIFID and technical contact information.

### **Location information for a facility that has previously submitted data to EPA, but has changed physical location.**

**Hard copy paper Form A (trade secret submissions only):** If your facility has moved, do not enter your previously assigned TRI Facility Identification Number, enter “New Facility”. If you are uncertain if a TRIFID has been assigned to your new facility location, use Envirofacts on the Web to look up the address or facility name at: <http://www.epa.gov/enviro>.

**TRI-MEweb:** If your facility has moved, you will need to request that a new TRIFID be assigned to your facility. To request a new TRIFID, add a new facility account to TRI-MEweb and choose to report as a new reporting facility (option 3). TRI-MEweb will automatically generate a new TRIFID for your facility. The TRIFID assigned to your new reporting facility should be used in all future reporting of TRI data.

### **Location information for a facility that has changed ownership, but has not changed physical location.**

The TRI Facility Identification Number (TRIFID) is established by the first Form R or A submitted by a facility at a particular location. Only a change in address warrants filing as a new facility; otherwise, the TRI Facility Identification Number is retained by the facility even if the facility changes name, ownership, production processes, NAICS codes, etc.

**Hard copy paper Form A (trade secret submissions only):** The TRIFID will always stay with the physical location of a facility. If a new facility unit moves to this location it should use this TRIFID. Establishments of a facility (for facilities that report by part) that report separately should use the TRIFID of the primary facility.

**TRI-MEweb:** If your facility has changed ownership during the reporting year but not its physical location, the facility does not require a new TRIFID. Use the TRIFID assigned to the previous owner. TRI-MEweb can be used to update facility information due to a change of ownership.

## *Instructions for Completing TRI Form A Certification Statement*

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### **Location reporting TRI releases for the first time to EPA.**

***Hard copy paper Form A Certification Statement (trade secret submissions only):*** If you are preparing a hard copy TRI form for the first time for your facility's location and have never reported to TRI in previous years, you should enter "New Facility" in the space on the hard copy form designated for the TRI Facility Identification number (TRIFID).

***TRI-MEweb:*** If your facility is reporting for the first time, upon creating your CDX account, and adding the TRI-MEweb application, you will be prompted to add a new facility account into TRI-MEweb. TRI-MEweb will automatically generate a new TRIFID for your facility. The TRIFID assigned to your new reporting facility should be used in all future reporting of TRI data.

### **4.2 Federal Facility Designation**

Executive Order 13423 directs federal facilities to comply with Right-To-Know Laws and Pollution Prevention Requirements. In TRI-MEweb, users should select the appropriate button for: 1) federal facility (Section 4.2c), 2) GOCO facility (Section 4.2d), or 3) neither. Federal facilities should select only 'federal facility' even if their TRI reports contain release and other waste management information from contractors located at the facility. Contractors at federal facilities that are required by EPCRA Section 313 to file TRI reports independently of the federal facility, should select GOCO. This information is important to prevent duplication of federal facility data. (See Appendix A for further guidance on these instructions.)

Note that the reporting by part option is not applicable for facilities submitting a Form A for a TRI chemical. Unlike the Form R, the Form A does not utilize Sections 4.2a or 4.2b which provide the option of reporting full or partial facility information if the facility is composed of several distinct establishments.

### **4.3 Technical Contact**

In TRI-MEweb, facilities must enter the name and telephone number (including area code) of a technical representative whom EPA, state, or tribal officials may contact for clarification of the information reported on Form A. If possible, this number should be for the technical representative

rather than a general number for the facility. An email address should also be entered for this person. EPA encourages facilities to provide an email address for the Technical Contact on their TRI submissions because they will be able to receive important program updates and email alerts notifying them when their eFDP has been updated and published for their review. If the technical contact does not have an email address, leave the field blank. This contact person does not have to be the same person who prepares the report or signs the certification statement and does not necessarily need to be someone at the location of the reporting facility. However, this person should be familiar with the details of the report so that he or she can answer questions about the information provided. As facilities may report unique technical contacts for each form, technical contact details are entered in TRI-MEweb with chemical-specific data rather than facility-identification information.

### **4.4 Public Contact**

In TRI-MEweb, facilities must enter the name and telephone number (including area code) of a person who can respond to questions from the public about the form. You should also enter an e-mail address for this person. If the public contact does not have an email address, leave the field blank. If you choose to designate the same person as both the Technical and the Public Contact, or you do not have a Public Contact, you may enter "Same as Section 4.3" in this space. This contact person does not have to be the same person who prepares the form or signs the Certification Statement and does not necessarily need to be someone at the location of the reporting facility. As facilities may report unique public contacts for each form, public contact details are entered in TRI-MEweb with chemical-specific data rather than facility-identification information.

### **4.5 North American Industry Classification System (NAICS) Code**

Enter the appropriate six-digit North American Industry Classification System (NAICS) Code that is the primary NAICS Code for your facility in Section 4.5(a). Use 2012 NAICS codes for RY 2013 and 2014 reporting and 2007 NAICS codes for RY 2006 – 2012 reporting. Enter any other applicable NAICS for your facility in 4.5 (b)-(f), also called "secondary NAICS codes" in TRI-MEweb. If you do not know your NAICS code(s), consult the 2012 NAICS Manual or check the SIC to NAICS crosswalk tables at: <http://www.census.gov>.

## ***Instructions for Completing TRI Form A Certification Statement***

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The North American Industry Classification System (NAICS) is the economic classification system that replaced the 1987 SIC code system. A Federal Register notice was published on June 6, 2006 (71 FR 32464) adopting 2007 NAICS codes for TRI reporting. A direct final rule was published July 18, 2013 (78 FR 42875), adopting 2012 NAICS codes for RY 2013 and subsequent years. Table I lists all industries that are covered under EPCRA 313 and their corresponding 2012 NAICS codes.

### **4.6 Dun & Bradstreet Number(s)**

Enter the nine-digit number assigned by Dun & Bradstreet (D&B) for your facility or each establishment within your facility. These numbers code the facility for financial purposes. This number may be available from your facility's treasurer or financial officer. You can also obtain the numbers from Dun & Bradstreet by calling 1-888-814-1435, or by visiting this website:

[https://www.dnb.com/product/dlw/form\\_cc4.htm](https://www.dnb.com/product/dlw/form_cc4.htm). If a facility does not subscribe to the D&B service, a number can be obtained, toll free at 800 234-3867 (8:00 AM to 6:00 PM, EST) or on the Web at:

<http://www.dnb.com>. If none of your establishments has been assigned a D&B number, you should check "D&B Numbers Not Applicable." If only some of your establishments have been assigned D&B numbers, enter those numbers in Part I, section 4.6.

### **Section 5. Parent Company Information**

You must provide information on your parent company. For TRI Reporting purposes, your parent company is as the highest level company, located in the United States, and that directly owns at least 50 percent of the voting stock of your company. If there is no higher level U.S. company, select the "No U.S. Parent Company parent (for TRI reporting purposes)" check box. Corporate names should be

treated as parent company names for companies with multiple facility sites. For example, the Bestchem Corporation is not owned or controlled by any other corporation but has sites throughout the country whose names begin with Bestchem. In this case, Bestchem Corporation should be listed as the parent company. Note that a facility that is a 50:50 joint venture is its own parent company. When a facility is owned by more than one company and none of the facility owners directly owns at least 50 percent of its voting stock, the facility should provide the name of the parent company of either the facility operator or the owner with the largest ownership interest in the facility.

### **5.1 Name of Parent Company**

Enter the name of the corporation or other business entity that is your highest level U.S. parent company. If your facility has no higher level U.S. company, select the "No U.S. Parent Company (for TRI reporting purposes)" check box.

To improve data quality, TRI standardizes parent company names. TRI-MEweb is preloaded with the standardized parent company names. A full list of parent company names for RY 2014 is available for download at: <http://www2.epa.gov/toxics-release-inventory-tri-program/standardized-parent-company-names-ry-2014-tri-reporting>.

### **5.2 Parent Company's Dun & Bradstreet Number**

Enter the D&B number for your ultimate U.S. parent company, if applicable. The number may be obtained from the treasurer or financial officer of the company or by calling 1-888-814-1435, or by visiting this website:

[https://www.dnb.com/product/dlw/form\\_cc4.htm](https://www.dnb.com/product/dlw/form_cc4.htm). If your parent company does not have a D&B number, you should check "Parent Company D&B Number Not Applicable."

## **Part II. Chemical Identification**

Reporting on the Alternate Threshold Form A Certification Statement for metals, metal category compounds, and mixed isomers differs somewhat from Form R reporting. Please refer to Section E.7 for these guidelines.

### **Section 1. Toxic Chemical Identity**

#### **1.1 CAS Number**

Initiating a Form A for a chemical or chemical category in TRI-MEweb automatically completes this section.

If you are making a trade secret claim, you must report the CAS number or category code on your unsanitized Form A and unsanitized substantiation form. Enter the CAS registry number exactly as it appears in Table II of these instructions for the chemical being reported. CAS numbers are cross-referenced with an alphabetical list of chemical names in Table II. If you are reporting one of the EPCRA Section 313 chemical categories (e.g., chromium compounds), you should enter the applicable category code in the CAS number space. EPCRA Section 313 chemical category codes are listed below and can also be found in Table IIc.

Do not include the CAS number or category code on your sanitized Form A or sanitized substantiation form.

#### **1.2 EPCRA Section 313 Chemical or Chemical Category Name**

Initiating a Form A for a chemical or chemical category in TRI-MEweb automatically completes this section.

If you are making a trade secret claim, you must report the specific EPCRA Section 313 chemical identity on your unsanitized Form A and unsanitized substantiation form. Enter the name of the EPCRA Section 313 chemical or chemical category exactly as it appears in Table II. If the EPCRA Section 313 chemical name is followed by a synonym in parentheses, report the chemical by the name that directly follows the CAS number (i.e., not the synonym). If the EPCRA Section 313 chemical identity is actually a product trade name (e.g., Dicofol), the *Chemical Abstracts 9th Collective Index* name is listed below it in brackets. You may report either name in this case.

**Do not** list the name of a chemical that does not appear in Table II, such as individual members of an EPCRA Section 313 chemical category. For example, if you use silver chloride, **do not** report silver chloride with its CAS number. Report this chemical as “silver compounds” with its category code, N740.

Do not report the name of the EPCRA Section 313 chemical on your sanitized Form A or sanitized substantiation form. Include a generic name that is structurally descriptive in Part II, Section 1.3 of your sanitized Form A report.

#### **1.3 Generic Chemical Name**

Complete Section 1.3 only if you are claiming the specific EPCRA Section 313 chemical identity of the EPCRA Section 313 chemical as a trade secret and have marked the trade secret block in Part I, Section 2.1 on Page 1 of Form A. Enter a generic chemical name that is descriptive of the chemical structure. You should limit the generic name to 70 characters (e.g., numbers, letters, spaces, punctuation) or less. Do not enter mixture names in Section 1.3; see Section 2 below.

In-house plant codes and other substitute names that are not structurally descriptive of the EPCRA Section 313 chemical identity being withheld as a trade secret are not acceptable as a generic name. The generic name must appear on both sanitized and unsanitized Form As, and the name must be the same as that used on your substantiation forms.

### **Section 2. Mixture Component Identity**

Complete this section only if you are reporting for an EPCRA 313 chemical whose identity has been withheld by the chemical supplier. You do not need to supply trade secret substantiation forms for this EPCRA Section 313 chemical because it is your supplier who is claiming the chemical identity a trade secret.

#### **2.1 Generic Chemical Name Provided by Supplier**

Enter the generic chemical name in this section only if the following three conditions apply:

1.) You determine that the mixture contains an EPCRA Section 313 chemical but the

## *Instructions for Completing TRI Form A Certification Statement*

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only identity you have for that chemical is a generic name;

2.) You know either the specific concentration of that EPCRA Section 313 chemical component or a maximum or average concentration level; and

3.) You multiply the concentration level by the total annual amount of the whole mixture processed or otherwise used and determine that you meet the process or otherwise use threshold for that single, generically identified mixture component.

To begin a TRI Form A for a generic chemical in TRI-MEweb, click the **“create a form for a Generic Chemical Name Provided by Supplier”** link from the “Add New Chemical Forms” search page, then enter generic chemical name. The generic chemical name may not be that of a listed TRI chemical or chemical category and must be less than 70 characters in length. Facilities may also use the Import Data tool to set up a reporting form for a generic chemical reported in prior years.

## **G. Optional Facility-Level Information**

Although there is no requirement to inform the EPA of updates to a facility's contact and location information outside of what is required on a TRI reporting form, each year some facilities voluntarily elect to provide this information to the EPA. Additionally, each reporting year some facilities contact EPA to indicate that they will no longer be reporting to TRI or will not be submitting a form for one or more specific TRI-listed chemicals.

As of January 2015, facilities can use TRI-MEweb to provide optional facility-level information for the following categories:

- Facility name has changed
- Facility technical contact has changed
- Facility public contact has changed
- Facility has relocated to a new physical address
- Facility merged with another location
- Facility has closed
- Facility was temporarily shut down
- Facility did not have 10 or more full-time employee equivalents
- Facility is not in a covered NAICS sector
- Facility fell below reporting threshold for one or more chemicals due to source reduction
- Facility fell below reporting threshold for one or more chemicals due to reason(s) other than source reduction

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**Table I. NAICS Codes**

**1.1 NAICS codes that correspond to SIC codes 20 through 39:**

<b>311</b>	<b>Food Manufacturing</b>	311340	Nonchocolate Confectionery Manufacturing (except facilities primarily engaged in the retail sale of candy, nuts, popcorn and other confections not for immediate consumption made on the premises)
<b>3111</b>	<b>Animal Food Manufacturing</b>	311411	Frozen Fruit, Juice, and Vegetable Manufacturing
<b>31111</b>	<b>Animal Food Manufacturing</b>	311412	Frozen Specialty Food Manufacturing
311111	Dog and Cat Food Manufacturing	<b>31142</b>	<b>Fruit and Vegetable Canning, Pickling and Drying</b>
311119	Other Animal Food Manufacturing (except facilities primarily engaged in Custom Grain Grinding for Animal Feed)	311421	Fruit and Vegetable Canning
<b>3112</b>	<b>Grain and Oilseed Milling</b>	311422	Specialty Canning
<b>31121</b>	<b>Flour Milling and Malt Manufacturing</b>	311423	Dried and Dehydrated Food Manufacturing
311211	Flour Milling	<b>3115</b>	<b>Dairy Product Manufacturing</b>
311212	Rice Milling	<b>31151</b>	<b>Dairy Product (except Frozen) Manufacturing</b>
311213	Malt Manufacturing	311511	Fluid Milk Manufacturing
<b>31122</b>	<b>Starch and Vegetable Fats and Oils Manufacturing</b>	311512	Creamery Butter Manufacturing
311221	Wet Corn Milling	311513	Cheese Manufacturing
311224	Soybean and Other Oilseed Processing	311514	Dry, Condensed, and Evaporated Dairy Product Manufacturing
311225	Fats and Oils Refining and Blending	<b>31152</b>	<b>Ice Cream and Frozen Dessert Manufacturing</b>
<b>31123</b>	<b>Breakfast Cereal Manuf.</b>	311520	Ice Cream and Frozen Dessert Manufacturing
311230	Breakfast Cereal Manufacturing	<b>3116</b>	<b>Animal Slaughtering and Processing</b>
<b>3113</b>	<b>Sugar and Confectionery Product Manufacturing</b>	<b>31161</b>	<b>Animal Slaughtering and Processing</b>
<b>31131</b>	<b>Sugar Manufacturing</b>	311611	Animal (except Poultry) Slaughtering (except for facilities primarily engaged in Custom Slaughtering for individuals)
311313	Beet Sugar Manufacturing	311612	Meat Processed from Carcasses [except for facilities primarily engaged in the cutting up and resale of purchased fresh carcasses for the trade (including boxed beef)]
311314	Cane Sugar Manufacturing	311613	Rendering and Meat Byproduct Processing
<b>31133</b>	<b>Confectionery Manufacturing from Purchased Chocolate</b>	311615	Poultry Processing
<b>31134</b>	<b>Nonchocolate Confectionery Manufacturing</b>		



Table I. NAICS Codes

<b>3117</b>	<b>Seafood Product Preparation and Packaging</b>	<b>31199</b>	<b>All Other Miscellaneous Food Manufacturing</b>
311710	Seafood Product Preparation and Packaging	311991	Perishable Prepared Food Manufacturing
		311999	All Other Miscellaneous Food Manufacturing
<b>3118</b>	<b>Bakeries and Tortilla Manufacturing</b>	<b>312</b>	<b>Beverage and Tobacco Product Manufacturing</b>
<b>31181</b>	<b>Bread and Bakery Product Manufacturing</b>	<b>3121</b>	<b>Beverage Manufacturing</b>
311812	Commercial Bakeries	<b>31211</b>	<b>Soft Drink and Ice Manufacturing</b>
311813	Frozen Cakes, Pies, and Other Pastries Manufacturing	312111	Soft Drink Manufacturing
<b>31182</b>	<b>Cookie, Cracker, and Pasta Manufacturing</b>	312112	Bottled Water Manufacturing (except facilities primarily engaged in bottling mineral or spring water)
311821	Cookie and Cracker Manufacturing	312113	Ice Manufacturing
311824	Dry Pasta ,Dough, and Flour Mixes Manufacturing from Purchased Flour	<b>31212</b>	<b>Breweries</b>
		312120	Breweries
<b>31183</b>	<b>Tortilla Manufacturing</b>	<b>31213</b>	<b>Wineries</b>
311830	Tortilla Manufacturing	312130	Wineries
<b>3119</b>	<b>Other Food Manufacturing</b>	<b>31214</b>	<b>Distilleries</b>
<b>31191</b>	<b>Snack Food Manufacturing</b>	312140	Distilleries
311911	Roasted Nuts and Peanut Butter Manufacturing	<b>3122</b>	<b>Tobacco Manufacturing</b>
311919	Other Snack Food Manufacturing	<b>31221</b>	<b>Tobacco Stemming and Redrying</b>
<b>31192</b>	<b>Coffee and Tea Manufacturing</b>	312210	Tobacco Stemming and Redrying
311920	Coffee and Tea Manufacturing	<b>31223</b>	<b>Tobacco Product Manufacturing</b>
<b>31193</b>	<b>Flavoring Syrup and Concentrate Manufacturing</b>	312230	Tobacco Manufacturing
311930	Flavoring Syrup and Concentrate Manufacturing	<b>313</b>	<b>Textile Mills</b>
<b>31194</b>	<b>Seasoning and Dressing Manufacturing</b>	<b>3131</b>	<b>Fiber, Yarn, and Thread Mills</b>
311941	Mayonnaise, Dressing, and Other Prepared Sauce Manufacturing	<b>31311</b>	<b>Fiber, Yarn, and Thread Mills</b>
311942	Spice and Extract Manufacturing		

Table I. NAICS Codes

313110	Fiber, Yarn, and Thread Mills	314910	Textile Bag and Canvas Mills
<b>3132</b>	<b>Fabric Mills</b>	<b>31499</b>	<b>All Other Textile Product Mills</b>
<b>31321</b>	<b>Broadwoven Fabric Mills</b>	314994	Rope, Cordage, Twine, Tire Cord, and Tire Fabric Mills
313210	Broadwoven Fabric Mills	314999	All Other Miscellaneous Textile Product Mills (except facilities engaged in binding carpets and rugs for the trade, carpet cutting and binding, and embroidering on textile products (except apparel) for the trade)
<b>31322</b>	<b>Narrow Fabric Mills and Schiffli Machine Embroidery</b>	<b>315</b>	<b>Apparel Manufacturing</b>
313220	Narrow Fabric Mills and Schiffli Machine Embroidery	<b>3151</b>	<b>Apparel Knitting Mills</b>
<b>31323</b>	<b>Nonwoven Fabric Mills</b>	<b>31511</b>	<b>Hosiery and Sock Mills</b>
313230	Nonwoven Fabric Mills	315110	Hosiery and Sock Mills
<b>31324</b>	<b>Knit Fabric Mills</b>	<b>31519</b>	<b>Other Apparel Knitting Mills</b>
3132401	Knit Fabric Mills	315190	Other Apparel Knitting Mills
<b>3133</b>	<b>Textile and Fabric Finishing and Fabric Coating Mills</b>	<b>3152</b>	<b>Cut and Sew Apparel Manufacturing</b>
<b>31331</b>	<b>Textile and Fabric Finishing Mills</b>	<b>31521</b>	<b>Cut and Sew Apparel Contractors</b>
313310	Textile and Fabric Finishing Mills (except facilities primarily engaged in converting broadwoven piece goods and broadwoven textiles and facilities primarily engaged in sponging fabric for tailors and dressmakers and facilities primarily engaged in converting narrow woven textiles and narrow woven piece goods)	315210	Cut and Sew Apparel Contractors
<b>31332</b>	<b>Fabric Coating Mills</b>	<b>31522</b>	<b>Men's and Boys' Cut and Sew Apparel Manufacturing</b>
313320	Fabric Coating Mills	315220	Men's and Boys' Cut and Sew Apparel Manufacturing (except custom tailors primarily engaged in making and selling men's and boy's suits, cut and sewn from purchased fabric)
<b>314</b>	<b>Textile Product Mills</b>	<b>31524</b>	<b>Women's, Girls', and Infants' Cut and Sew Apparel Manufacturing</b>
<b>3141</b>	<b>Textile Furnishing Mills</b>	315240	Women's, Girls', and Infants' Cut and Sew Apparel Manufacturing
<b>31411</b>	<b>Carpet and Rug Mills</b>	<b>31528</b>	<b>Other Cut and Sew Apparel Manufacturing</b>
314110	Carpet and Rug Mills	315280	Other Cut and Sew Apparel Manufacturing
<b>31412</b>	<b>Curtain and Linen Mills</b>		
314120	Curtain and Linen Mills (except facilities primarily engaged in making custom drapery for retail sale)		
<b>3149</b>	<b>Other Textile Product Mills</b>		
<b>31491</b>	<b>Textile Bag and Canvas Mills</b>		

Table I. NAICS Codes

<b>3159</b>	<b>Apparel Accessories and Other Apparel Manufacturing</b>	<b>32121</b>	<b>Veneer, Plywood, and Engineered Wood Product Manufacturing</b>
<b>31599</b>	<b>Apparel Accessories and Other Apparel Manufacturing</b>	321211	Hardwood Veneer and Plywood Manufacturing
315990	Apparel Accessories and Other Apparel Manufacturing	321212	Softwood Veneer and Plywood Manufacturing
<b>316</b>	<b>Leather and Allied Product Manufacturing</b>	321213	Engineered Wood Member (except Truss) Manufacturing
<b>3161</b>	<b>Leather and Hide Tanning and Finishing</b>	321214	Truss Manufacturing
<b>31611</b>	<b>Leather and Hide Tanning and Finishing</b>	321219	Reconstituted Wood Product Manufacturing
316110	Leather and Hide Tanning and Finishing	<b>3219</b>	<b>Other Wood Product Manufacturing</b>
<b>3162</b>	<b>Footwear Manufacturing</b>	<b>32191</b>	<b>Millwork</b>
<b>31621</b>	<b>Footwear Manufacturing</b>	321911	Wood Window and Door Manufacturing
316210	Footwear Manufacturing	321912	Cut Stock, Resawing Lumber, and Planing
<b>3169</b>	<b>Other Leather and Allied Product Manufacturing</b>	321918	Other Millwork (including Flooring)
<b>31699</b>	<b>Other Leather and Allied Product Manufacturing</b>	<b>32192</b>	<b>Wood Container and Pallet Manufacturing</b>
316992	Women's Handbag and Purse Manufacturing	321920	Wood Container and Pallet Manufacturing
316998	All Other Leather Good and Allied Product Manufacturing	<b>32199</b>	<b>All Other Wood Product Manufacturing</b>
<b>321</b>	<b>Wood Product Manufacturing</b>	321991	Manufactured Home (Mobile Home) Manufacturing
<b>3211</b>	<b>Sawmills and Wood Preservation</b>	321992	Prefabricated Wood Building Manufacturing
321113	Sawmills	321999	All Other Miscellaneous Wood Product Manufacturing
321114	Wood Preservation	<b>322</b>	<b>Paper Manufacturing</b>
<b>3212</b>	<b>Veneer, Plywood, and Engineered Wood Product Manufacturing</b>	<b>3221</b>	<b>Pulp, Paper, and Paperboard Mills</b>
		<b>32211</b>	<b>Pulp Mills</b>
		322110	Pulp Mills
		<b>32212</b>	<b>Paper Mills</b>
		322121	Paper (except Newsprint) Mills
		322122	Newsprint Mills
		<b>32213</b>	<b>Paperboard Mills</b>

Table I. NAICS Codes

322130	Paperboard Mills	<b>324</b>	<b>Petroleum and Coal Products Manufacturing</b>
<b>3222</b>	<b>Converted Paper Product Manufacturing</b>	<b>3241</b>	<b>Petroleum and Coal Products Manufacturing</b>
<b>32221</b>	<b>Paperboard Container Manufacturing</b>	<b>32411</b>	<b>Petroleum Refineries</b>
322211	Corrugated and Solid Fiber Box Manufacturing	324110	Petroleum Refineries
322212	Folding Paperboard Box Manufacturing	<b>32412</b>	<b>Asphalt Paving, Roofing, and Saturated Materials Manufacturing</b>
322219	Other Paperboard Container Manufacturing	324121	Asphalt Paving Mixture and Block Manufacturing
<b>32222</b>	<b>Paper Bag and Coated and Treated Paper Manufacturing</b>	324122	Asphalt Shingle and Coating Materials Manufacturing
322220	Paper Bag and Coated and Treated Paper Manufacturing	<b>32419</b>	<b>Other Petroleum and Coal Products Manufacturing</b>
<b>32223</b>	<b>Stationery Product Manufacturing</b>	324191	Petroleum Lubricating Oil and Grease Manufacturing
322230	Stationery Product Manufacturing	324199	All Other Petroleum and Coal Products Manufacturing
<b>32229</b>	<b>Other Converted Paper Product Manufacturing</b>	<b>325</b>	<b>Chemical Manufacturing</b>
322291	Sanitary Paper Product Manufacturing	<b>3251</b>	<b>Basic Chemical Manufacturing</b>
322299	All Other Converted Paper Product Manufacturing	<b>32511</b>	<b>Petrochemical Manufacturing</b>
<b>323</b>	<b>Printing and Related Support Activities</b>	325110	Petrochemical Manufacturing
<b>3231</b>	<b>Printing and Related Support Activities</b>	<b>32512</b>	<b>Industrial Gas Manufacturing</b>
<b>32311</b>	<b>Printing</b>	325120	Industrial Gas Manufacturing
323111	Commercial Printing (Except Screen and Books) (except facilities primarily engaged in reproducing text, drawings, plans, maps, or other copy by blueprinting, photocopying, mimeographing, or other methods of duplication other than printing or microfilming ( <i>i.e.</i> , instant printing))	<b>32513</b>	<b>Synthetic Dye and Pigment Manufacturing</b>
323113	Commercial Screen Printing	325130	Synthetic Dye and Pigment Manufacturing
323117	Books Printing	<b>32518</b>	<b>Other Basic Inorganic Chemical Manufacturing</b>
<b>32312</b>	<b>Support Activities for Printing</b>	325180	Other Basic Inorganic Chemical Manufacturing
3231201	Support Activities for Printing	<b>32519</b>	<b>Other Basic Organic Chemical Manufacturing</b>

Table I. NAICS Codes

325193	Ethyl Alcohol Manufacturing	325414	Biological Product (except Diagnostic) Manufacturing
323194	Cyclic Crude, Intermediate, and Gum and Wood Chemical Manufacturing	<b>3255</b>	<b>Paint, Coating, and Adhesive Manufacturing</b>
325199	All Other Basic Organic Chemical Manufacturing	<b>32551</b>	<b>Paint and Coating Manufacturing</b>
<b>3252</b>	<b>Resin, Synthetic Rubber, and Artificial Synthetic Fibers and Filaments Manufacturing</b>	325510	Paint and Coating Manufacturing
<b>32521</b>	<b>Resin and Synthetic Rubber Manufacturing</b>	<b>32552</b>	<b>Adhesive Manufacturing</b>
325211	Plastics Material and Resin Manufacturing	325520	Adhesive Manufacturing
325212	Synthetic Rubber Manufacturing	<b>3256</b>	<b>Soap, Cleaning Compound, and Toilet Preparation Manufacturing</b>
<b>32522</b>	<b>Artificial and Synthetic Fibers and Filaments Manufacturing</b>	<b>32561</b>	<b>Soap and Cleaning Compound Manufacturing</b>
325220	Artificial and Synthetic Fibers and Filaments Manufacturing	325611	Soap and Other Detergent Manufacturing
<b>3253</b>	<b>Pesticide, Fertilizer, and Other Agricultural Chemical Manufacturing</b>	325612	Polish and Other Sanitation Good Manufacturing
<b>32531</b>	<b>Fertilizer Manufacturing</b>	325613	Surface Active Agent Manufacturing
325311	Nitrogenous Fertilizer Manufacturing	<b>32562</b>	<b>Toilet Preparation Manufacturing</b>
325312	Phosphatic Fertilizer Manufacturing	325620	Toilet Preparation Manufacturing
325314	Fertilizer (Mixing Only) Manufacturing	<b>3259</b>	<b>Other Chemical Product and Preparation Manufacturing</b>
<b>32532</b>	<b>Pesticide and Other Agricultural Chemical Manufacturing</b>	<b>32591</b>	<b>Printing Ink Manufacturing</b>
325320	Pesticide and Other Agricultural Chemical Manufacturing	325910	Printing Ink Manufacturing
<b>3254</b>	<b>Pharmaceutical and Medicine Manufacturing</b>	<b>32592</b>	<b>Explosives Manufacturing</b>
<b>32541</b>	<b>Pharmaceutical and Medicine Manufacturing</b>	325920	Explosives Manufacturing
325411	Medicinal and Botanical Manufacturing	<b>32599</b>	<b>All Other Chemical Product and Preparation Manufacturing</b>
325412	Pharmaceutical Preparation Manufacturing	325991	Custom Compounding of Purchased Resins
325413	In-Vitro Diagnostic Substance Manufacturing	325992	Photographic Film, Paper, Plate, and Chemical Manufacturing

Table I. NAICS Codes

325998	All Other Miscellaneous Chemical Product and Preparation Manufacturing (except facilities primarily engaged in Aerosol can filling on a job order or contract Basis)	<b>32619</b>	<b>Other Plastics Product Manufacturing</b>
<b>326</b>	<b>Plastics and Rubber Products Manufacturing</b>	326191	Plastics Plumbing Fixture Manufacturing
<b>3261</b>	<b>Plastics Product Manufacturing</b>	326199	All Other Plastics Product Manufacturing
<b>32611</b>	<b>Plastics Packaging Materials and Unlaminated Film and Sheet Manufacturing</b>	<b>3262</b>	<b>Rubber Product Manufacturing</b>
326111	Plastics Bag and Pouch Manufacturing	<b>32621</b>	<b>Tire Manufacturing</b>
326112	Plastics Packaging Film and Sheet (including Laminated) Manufacturing	326211	Tire Manufacturing (except Retreading)
326113	Unlaminated Plastics Film and Sheet (except Packaging) Manufacturing	<b>32622</b>	<b>Rubber and Plastics Hoses and Belting Manufacturing</b>
<b>32612</b>	<b>Plastics, Pipe, Pipe Fitting, and Unlaminated Profile Shape Manufacturing</b>	326220	Rubber and Plastics Hoses and Belting Manufacturing
326121	Unlaminated Plastics Profile Shape Manufacturing	<b>32629</b>	<b>Other Rubber Product Manufacturing</b>
326122	Plastics Pipe and Pipe Fitting Manufacturing	326291	Rubber Product Manufacturing for Mechanical Use
<b>32613</b>	<b>Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing</b>	326299	All Other Rubber Product Manufacturing
326130	Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing	<b>327</b>	<b>Nonmetallic Mineral Product Manufacturing</b>
<b>32614</b>	<b>Polystyrene Foam Product Manufacturing</b>	<b>3271</b>	<b>Clay Product and Refractory Manufacturing</b>
326140	Polystyrene Foam Product Manufacturing	<b>32711</b>	<b>Pottery, Ceramics, and Plumbing Fixture Manufacturing</b>
<b>32615</b>	<b>Urethane and Other Foam Product (except Polystyrene) Manufacturing</b>	327110	Pottery, Ceramics, and Plumbing Fixture Manufacturing
326150	Urethane and Other Foam Product (except Polystyrene) Manufacturing	<b>32712</b>	<b>Clay Building Material and Refractories Manufacturing</b>
<b>32616</b>	<b>Plastics Bottle Manufacturing</b>	327120	Clay Building Material and Refractories Manufacturing
326160	Plastics Bottle Manufacturing	<b>3272</b>	<b>Glass and Glass Product Manufacturing</b>
		<b>32721</b>	<b>Glass and Glass Product Manufacturing</b>
		327211	Flat Glass Manufacturing

Table I. NAICS Codes

327212	Other Pressed and Blown Glass and Glassware Manufacturing	327992	Ground or Treated Mineral and Earth Manufacturing
327213	Glass Container Manufacturing	327993	Mineral Wool Manufacturing
327215	Glass Product Manufacturing Made of Purchased Glass	327999	All Other Miscellaneous Nonmetallic Mineral Product Manufacturing
<b>3273</b>	<b>Cement and Concrete Product Manufacturing</b>	<b>331</b>	<b>Primary Metal Manufacturing</b>
<b>32731</b>	<b>Cement Manufacturing</b>	<b>3311</b>	<b>Iron and Steel Mills and Ferroalloy Manufacturing</b>
327310	Cement Manufacturing	<b>33111</b>	<b>Iron and Steel Mills and Ferroalloy Manufacturing</b>
<b>32732</b>	<b>Ready-Mix Concrete Manufacturing</b>	331110	Iron and Steel Mills and Ferroalloy Manufacturing
327320	Ready-Mix Concrete Manufacturing	<b>3312</b>	<b>Steel Product Manufacturing from Purchased Steel</b>
<b>32733</b>	<b>Concrete Pipe, Brick, and Block Manufacturing</b>	<b>33121</b>	<b>Iron and Steel Pipe and Tube Manufacturing from Purchased Steel</b>
327331	Concrete Block and Brick Manufacturing	331210	Iron and Steel Pipe and Tube Manufacturing from Purchased Steel
327332	Concrete Pipe Manufacturing	<b>33122</b>	<b>Rolling and Drawing of Purchased Steel</b>
<b>32739</b>	<b>Other Concrete Product Manufacturing</b>	331221	Rolled Steel Shape Manufacturing
327390	Other Concrete Product Manufacturing	331222	Steel Wire Drawing
<b>3274</b>	<b>Lime and Gypsum Product Manufacturing</b>	<b>3313</b>	<b>Alumina and Aluminum Production and Processing</b>
<b>32741</b>	<b>Lime Manufacturing</b>	<b>33131</b>	<b>Alumina and Aluminum Production and Processing</b>
327410	Lime Manufacturing	331313	Alumina Refining and Primary Aluminum Production
<b>32742</b>	<b>Gypsum Product Manufacturing</b>	331314	Secondary Smelting and Alloying of Aluminum
327420	Gypsum Product Manufacturing	331315	Aluminum Sheet, Plate, and Foil Manufacturing
<b>3279</b>	<b>Other Nonmetallic Mineral Product Manufacturing</b>	331318	Other Aluminum Rolling, Drawing, and Extruding
<b>32791</b>	<b>Abrasive Product Manufacturing</b>		
327910	Abrasive Product Manufacturing		
<b>32799</b>	<b>All Other Nonmetallic Mineral Product Manufacturing</b>		
327991	Cut Stone and Stone Product Manufacturing		

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<b>3314</b>	<b>Nonferrous Metal (except Aluminum) Production and Processing</b>	332114	Custom Roll Forming
<b>33141</b>	<b>Nonferrous Metal (except Aluminum) Smelting and Refining</b>	332117	Powder Metallurgy Part Manufacturing
331410	Nonferrous Metal (except Aluminum) Smelting and Refining	332119	Metal Crown, Closure, and Other Metal Stamping (Except Automotive)
<b>33142</b>	<b>Copper Rolling, Drawing, Extruding, and Alloying</b>	<b>3322</b>	<b>Cutlery and Handtool Manufacturing</b>
331420	Copper Rolling, Drawing, Extruding, and Alloying	<b>33221</b>	<b>Cutlery and Handtool Manufacturing</b>
<b>33149</b>	<b>Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, Extruding, and Alloying</b>	332215	Metal Kitchen Cookware, Utensil, Cutlery, and Flatware (except Precious) Manufacturing
331491	Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, and Extruding	332216	Saw Blade and Handtool Manufacturing
331492	Secondary Smelting, Refining, and Alloying of Nonferrous Metal (except Copper and Aluminum)	<b>3323</b>	<b>Architectural and Structural Metals Manufacturing</b>
<b>3315</b>	<b>Foundries</b>	<b>33231</b>	<b>Plate Work and Fabricated Structural Product Manufacturing</b>
<b>33151</b>	<b>Ferrous Metal Foundries</b>	332311	Prefabricated Metal Building and Component Manufacturing
331511	Iron Foundries	332312	Fabricated Structural Metal Manufacturing
331512	Steel Investment Foundries	332313	Plate Work Manufacturing
331513	Steel Foundries (except Investment)	<b>33232</b>	<b>Ornamental and Architectural Metal Products Manufacturing</b>
<b>33152</b>	<b>Nonferrous Metal Foundries</b>	332321	Metal Window and Door Manufacturing
331523	Nonferrous Metal Die-Casting Foundries	332322	Sheet Metal Work Manufacturing
331524	Aluminum Foundries (except Die-Casting)	332323	Ornamental and Architectural Metal Work Manufacturing
331529	Other Nonferrous Metal Foundries (except Die-Casting)	<b>3324</b>	<b>Boiler, Tank, and Shipping Container Manufacturing</b>
<b>332</b>	<b>Fabricated Metal Product Manufacturing</b>	<b>33241</b>	<b>Power Boiler and Heat Exchanger Manufacturing</b>
<b>3321</b>	<b>Forging and Stamping</b>	332410	Power Boiler and Heat Exchanger Manufacturing
<b>33211</b>	<b>Forging and Stamping</b>	<b>33242</b>	<b>Metal Tank (Heavy Gauge) Manufacturing</b>
332111	Iron and Steel Forging	332420	Metal Tank (Heavy Gauge) Manufacturing
332112	Nonferrous Forging		



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<b>33243</b>	<b>Metal Can, Box, and Other Metal Container (Light Gauge) Manufacturing</b>	<b>3329</b>	<b>Other Fabricated Metal Product Manufacturing</b>
332431	Metal Can Manufacturing	<b>33291</b>	<b>Metal Valve Manufacturing</b>
332439	Other Metal Container Manufacturing	332911	Industrial Valve Manufacturing
<b>3325</b>	<b>Hardware Manufacturing</b>	332912	Fluid Power Valve and Hose Fitting Manufacturing
<b>33251</b>	<b>Hardware Manufacturing</b>	332913	Plumbing Fixture Fitting and Trim Manufacturing
332510	Hardware Manufacturing	332919	Other Metal Valve and Pipe Fitting Manufacturing
<b>3326</b>	<b>Spring and Wire Product Manufacturing</b>	<b>33299</b>	<b>All Other Fabricated Metal Product Manufacturing</b>
<b>33261</b>	<b>Spring and Wire Product Manufacturing</b>	332991	Ball and Roller Bearing Manufacturing
332613	Spring Manufacturing	332992	Small Arms Ammunition Manufacturing
332618	Other Fabricated Wire Product Manufacturing	332993	Ammunition (except Small Arms) Manufacturing
<b>3327</b>	<b>Machine Shops; Turned Product; and Screw, Nut and Bolt Manufacturing</b>	332994	Small Arms, Ordnance, and Ordnance Accessories Manufacturing
<b>33271</b>	<b>Machine Shops</b>	332996	Fabricated Pipe and Pipe Fitting Manufacturing
332710	Machine Shops	332999	All Other Miscellaneous Fabricated Metal Product Manufacturing
<b>33272</b>	<b>Turned Product and Screw, Nut and Bolt Manufacturing</b>	<b>333</b>	<b>Machinery Manufacturing</b>
332721	Precision Turned Product Manufacturing	<b>3331</b>	<b>Agriculture, Construction, and Mining Machinery Manufacturing</b>
332722	Bolt, Nut, Screw, Rivet, and Washer Manufacturing	<b>33311</b>	<b>Agricultural Implement Manufacturing</b>
<b>3328</b>	<b>Coating, Engraving, Heat Treating, and Allied Activities</b>	333111	Farm Machinery and Equipment Manufacturing
<b>33281</b>	<b>Coating, Engraving, Heat Treating, and Allied Activities</b>	333112	Lawn and Garden Tractor and Home Lawn and Garden Equipment Manufacturing
332811	Metal Heat Treating	<b>33312</b>	<b>Construction Machinery Manufacturing</b>
332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	333120	Construction Machinery Manufacturing
332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	<b>33313</b>	<b>Mining and Oil and Gas Field Machinery Manufacturing</b>

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333131	Mining Machinery and Equipment Manufacturing	333415	Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment Manufacturing
333132	Oil and Gas Field Machinery and Equipment Manufacturing	<b>3335</b>	<b>Metalworking Machinery Manufacturing</b>
<b>3332</b>	<b>Industrial Machinery Manufacturing</b>	<b>33351</b>	<b>Metalworking Machinery Manufacturing</b>
<b>33324</b>	<b>Industrial Machinery Manufacturing</b>	333511	Industrial Mold Manufacturing
333241	Food Product Machinery Manufacturing	333514	Special Die and Tool, Die Set, Jig, and Fixture Manufacturing
333242	Semiconductor Machinery Manufacturing	333515	Cutting Tool and Machine Tool Accessory Manufacturing
333243	Sawmill, Woodworking, and Paper Machinery Manufacturing	333517	Machine Tool Manufacturing
333244	Printing Machinery and Equipment Manufacturing	333519	Rolling Mill and Other Metalworking Machinery Manufacturing
333249	Other Industrial Machinery Manufacturing	<b>3336</b>	<b>Engine, Turbine, and Power Transmission Equipment Manufacturing</b>
<b>3333</b>	<b>Commercial and Service Industry Machinery Manufacturing</b>	<b>33361</b>	<b>Engine, Turbine, and Power Transmission Equipment Manufacturing</b>
<b>33331</b>	<b>Commercial and Service Industry Machinery Manufacturing</b>	333611	Turbine and Turbine Generator Set Units Manufacturing
333316	Photographic and Photocopying Equipment Manufacturing	333612	Speed Changer, Industrial High-Speed Drive, and Gear Manufacturing
333318	Other Commercial and Service Industry Machinery Manufacturing	333613	Mechanical Power Transmission Equipment Manufacturing
<b>3334</b>	<b>Ventilation, Heating, Air-Conditioning, and Commercial Refrigeration</b>	333618	Other Engine Equipment Manufacturing
<b>33341</b>	<b>Equipment Manufacturing Ventilation, Heating, Air-Conditioning, and Commercial Refrigeration Equipment Manufacturing</b>	<b>3339</b>	<b>Other General Purpose Machinery Manufacturing</b>
333413	Industrial and Commercial Fan and Blower and Air Purification Equipment Manufacturing	<b>33391</b>	<b>Pump and Compressor Manufacturing</b>
333414	Heating Equipment (except Warm Air Furnaces) Manufacturing	333911	Pump and Pumping Equipment Manufacturing
		333912	Air and Gas Compressor Manufacturing
		333913	Measuring and Dispensing Pump Manufacturing

Table I. NAICS Codes

<b>33392</b>	<b>Material Handling Equipment Manufacturing</b>	334210	Telephone Apparatus Manufacturing
333921	Elevator and Moving Stairway Manufacturing	<b>33422</b>	<b>Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing</b>
333922	Conveyor and Conveying Equipment Manufacturing	334220	Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing
333923	Overhead Traveling Crane, Hoist, and Monorail System Manufacturing	<b>33429</b>	<b>Other Communications Equipment Manufacturing</b>
333924	Industrial Truck, Tractor, Trailer, and Stacker Machinery Manufacturing	334290	Other Communications Equipment Manufacturing
<b>33399</b>	<b>All Other General Purpose Machinery Manufacturing</b>	<b>3343</b>	<b>Audio and Video Equipment Manufacturing</b>
333991	Power-Driven Handtool Manufacturing	<b>33431</b>	<b>Audio and Video Equipment Manufacturing</b>
333992	Welding and Soldering Equipment Manufacturing	334310	Audio and Video Equipment Manufacturing
333993	Packaging Machinery Manufacturing	<b>3344</b>	<b>Semiconductor and Other Electronic Component Manufacturing</b>
333994	Industrial Process Furnace and Oven Manufacturing	<b>33441</b>	<b>Semiconductor and Other Electronic Component Manufacturing</b>
333995	Fluid Power Cylinder and Actuator Manufacturing	334412	Bare Printed Circuit Board Manufacturing
333996	Fluid Power Pump and Motor Manufacturing	334413	Semiconductor and Related Device Manufacturing
333997	Scale and Balance Manufacturing	334416	Capacitor, Resistor, Coil, Transformer, and Other Inductor Manufacturing
333999	All Other Miscellaneous General Purpose Machinery Manufacturing	334417	Electronic Connector Manufacturing
<b>334</b>	<b>Computer and Electronic Product Manufacturing</b>	334418	Printed Circuit Assembly (Electronic Assembly) Manufacturing
<b>3341</b>	<b>Computer and Peripheral Equipment Manufacturing</b>	334419	Other Electronic Component Manufacturing
<b>33411</b>	<b>Computer and Peripheral Equipment Manufacturing</b>	<b>3345</b>	<b>Navigational, Measuring, Electromedical, and Control Instruments Manufacturing</b>
334111	Electronic Computer Manufacturing	<b>33451</b>	<b>Navigational, Measuring, Electromedical, and Control Instruments Manufacturing</b>
334112	Computer Storage Device Manufacturing		
334118	Computer Terminal and Other Computer Peripheral Equipment Manufacturing		
<b>3342</b>	<b>Communications Equipment Manufacturing</b>		
<b>33421</b>	<b>Telephone Apparatus Manufacturing</b>		

Table I. NAICS Codes

334510	Electromedical and Electrotherapeutic Apparatus Manufacturing	<b>33512</b>	<b>Lighting Fixture Manufacturing</b>
334511	Search, Detection, Navigation, Guidance, Aeronautical, and Nautical System and Instrument Manufacturing	335121	Residential Electric Lighting Fixture Manufacturing
334512	Automatic Environmental Control Manufacturing for Residential, Commercial, and Appliance Use	335122	Commercial, Industrial, and Institutional Electric Lighting Fixture Manufacturing
334513	Instruments and Related Products Manufacturing for Measuring, Displaying, and Controlling Industrial Process Variables	335129	Other Lighting Equipment Manufacturing
334514	Totalizing Fluid Meter and Counting Device Manufacturing	<b>3352</b>	<b>Household Appliance Manufacturing</b>
334515	Instrument Manufacturing for Measuring and Testing Electricity and Electrical Signals	<b>33521</b>	<b>Small Electrical Appliance Manufacturing</b>
334516	Analytical Laboratory Instrument Manufacturing	335210	Small Electrical Appliance Manufacturing
334517	Irradiation Apparatus Manufacturing	<b>33522</b>	<b>Major Appliance Manufacturing</b>
334519	Other Measuring and Controlling Device Manufacturing	335221	Household Cooking Appliance Manufacturing
<b>3346</b>	<b>Manufacturing and Reproducing Magnetic and Optical Media</b>	335222	Household Refrigerator and Home Freezer Manufacturing
<b>33461</b>	<b>Manufacturing and Reproducing Magnetic and Optical Media</b>	335224	Household Laundry Equipment Manufacturing
334613	Blank Magnetic and Optical Recording Media Manufacturing	335228	Other Major Household Appliance Manufacturing
334614	Software and Other Prerecorded Compact Disc, Tape and Record Reproducing (except facilities primarily engaged in mass reproducing pre-recorded Video Cassettes, and mass reproducing Video tape or disk)	<b>3353</b>	<b>Electrical Equipment Manufacturing</b>
<b>335</b>	<b>Electrical Equipment, Appliance, and Component Manufacturing</b>	<b>33531</b>	<b>Electrical Equipment Manufacturing</b>
<b>3351</b>	<b>Electric Lighting Equipment Manufacturing</b>	335311	Power, Distribution, and Specialty Transformer Manufacturing
<b>33511</b>	<b>Electric Lamp Bulb and Part Manufacturing</b>	335312	Motor and Generator Manufacturing (except facilities primarily engaged in armature rewinding on a factory basis)
335110	Electric Lamp Bulb and Part Manufacturing	335313	Switchgear and Switchboard Apparatus Manufacturing
		335314	Relay and Industrial Control Manufacturing
		<b>3359</b>	<b>Other Electrical Equipment and Component Manufacturing</b>
		<b>33591</b>	<b>Battery Manufacturing</b>
		335911	Storage Battery Manufacturing

Table I. NAICS Codes

335912	Primary Battery Manufacturing	336214	Travel Trailer and Camper Manufacturing
<b>33592</b>	<b>Communication and Energy Wire and Cable Manufacturing</b>	<b>3363</b>	<b>Motor Vehicle Parts Manufacturing</b>
335921	Fiber Optic Cable Manufacturing	<b>33631</b>	<b>Motor Vehicle Gasoline Engine and Engine Parts Manufacturing</b>
335929	Other Communication and Energy Wire Manufacturing	336310	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing
<b>33593</b>	<b>Wiring Device Manufacturing</b>	<b>33632</b>	<b>Motor Vehicle Electrical and Electronic Equipment Manufacturing</b>
335931	Current-Carrying Wiring Device Manufacturing	336320	Motor Vehicle Electrical and Electronic Equipment Manufacturing
335932	Noncurrent-Carrying Wiring Device Manufacturing	<b>33633</b>	<b>Motor Vehicle Steering and Suspension Components (except Spring) Manufacturing</b>
<b>33599</b>	<b>All Other Electrical Equipment and Component Manufacturing</b>	336330	Motor Vehicle Steering and Suspension Components (except Spring) Manufacturing
335991	Carbon and Graphite Product Manufacturing	<b>33634</b>	<b>Motor Vehicle Brake System Manufacturing</b>
335999	All Other Miscellaneous Electrical Equipment and Component Manufacturing	336340	Motor Vehicle Brake System Manufacturing
<b>336</b>	<b>Transportation Equipment Manufacturing</b>	<b>33635</b>	<b>Motor Vehicle Transmission and Power Train Parts Manufacturing</b>
<b>3361</b>	<b>Motor Vehicle Manufacturing</b>	336350	Motor Vehicle Transmission and Power Train Parts Manufacturing
<b>33611</b>	<b>Automobile and Light Duty Motor Vehicle Manufacturing</b>	<b>33636</b>	<b>Motor Vehicle Seating and Interior Trim Manufacturing</b>
336111	Automobile Manufacturing	336360	Motor Vehicle Seating and Interior Trim Manufacturing
336112	Light Truck and Utility Vehicle Manufacturing	<b>33637</b>	<b>Motor Vehicle Metal Stamping</b>
<b>33612</b>	<b>Heavy Duty Truck Manufacturing</b>	336370	Motor Vehicle Metal Stamping
336120	Heavy Duty Truck Manufacturing	<b>33639</b>	<b>Other Motor Vehicle Parts Manufacturing</b>
<b>3362</b>	<b>Motor Vehicle Body and Trailer Manufacturing</b>	336390	Motor Vehicle Parts Manufacturing
<b>33621</b>	<b>Motor Vehicle Body and Trailer Manufacturing</b>		
336211	Motor Vehicle Body Manufacturing		
336212	Truck Trailer Manufacturing		
336213	Motor Home Manufacturing		

Table I. NAICS Codes

<b>3364</b>	<b>Aerospace Product and Parts Manufacturing</b>	<b>3371</b>	<b>Household and Institutional Furniture and Kitchen Cabinet Manufacturing</b>
<b>33641</b>	<b>Aerospace Product and Parts Manufacturing</b>	<b>33711</b>	<b>Wood Kitchen Cabinet and Countertop Manufacturing</b>
336411	Aircraft Manufacturing	337110	Wood Kitchen Cabinet and Countertop Manufacturing (except facilities primarily engaged in the retail sale of household furniture and that manufacture custom wood kitchen cabinets and counter tops)
336412	Aircraft Engine and Engine Parts Manufacturing	<b>33712</b>	<b>Household and Institutional Furniture Manufacturing</b>
336413	Other Aircraft Parts and Auxiliary Equipment Manufacturing	337121	Upholstered Household Furniture Manufacturing (except facilities primarily engaged in the retail sale of household furniture and that manufacture custom made upholstered household furniture)
336414	Guided Missile and Space Vehicle Manufacturing	337122	Nonupholstered Wood Household Furniture Manufacturing (except facilities primarily engaged in the retail sale of household furniture and that manufacture nonupholstered, household type, custom wood furniture)
336415	Guided Missile and Space Vehicle Propulsion Unit and Propulsion Unit Parts Manufacturing	337124	Metal Household Furniture Manufacturing
336419	Other Guided Missile and Space Vehicle Parts and Auxiliary Equipment Manufacturing	337125	Household Furniture (except Wood and Metal) Manufacturing
<b>3365</b>	<b>Railroad Rolling Stock Manufacturing</b>	337127	Institutional Furniture Manufacturing
<b>33651</b>	<b>Railroad Rolling Stock Manufacturing</b>	<b>3372</b>	<b>Office Furniture (including Fixtures) Manufacturing</b>
336510	Railroad Rolling Stock Manufacturing	<b>33721</b>	<b>Office Furniture (including Fixtures) Manufacturing</b>
<b>3366</b>	<b>Ship and Boat Building</b>	337211	Wood Office Furniture Manufacturing
<b>33661</b>	<b>Ship and Boat Building</b>	337212	Custom Architectural Woodwork and Millwork Manufacturing
336611	Ship Building and Repairing	337214	Office Furniture (except Wood) Manufacturing
336612	Boat Building	337215	Showcase, Partition, Shelving, and Locker Manufacturing
<b>3369</b>	<b>Other Transportation Equipment Manufacturing</b>	<b>3379</b>	<b>Other Furniture Related Product Manufacturing</b>
<b>33699</b>	<b>Other Transportation Equipment Manufacturing</b>	<b>33791</b>	<b>Mattress Manufacturing</b>
336991	Motorcycle, Bicycle, and Parts Manufacturing		
336992	Military Armored Vehicle, Tank, and Tank Component Manufacturing		
336999	All Other Transportation Equipment Manufacturing		
<b>337</b>	<b>Furniture and Related Product Manufacturing</b>		

Table I. NAICS Codes

337910	Mattress Manufacturing	339932	Game, Toy, and Children's Vehicle Manufacturing
<b>33792</b>	<b>Blind and Shade Manufacturing</b>	<b>33994</b>	<b>Office Supplies (except Paper) Manufacturing</b>
337920	Blind and Shade Manufacturing	339940	Office Supplies (except Paper) Manufacturing
<b>339</b>	<b>Miscellaneous Manufacturing</b>	339942	Lead Pencil and Art Good Manufacturing
<b>3391</b>	<b>Medical Equipment and Supplies Manufacturing</b>	339943	Marking Device Manufacturing
<b>33911</b>	<b>Medical Equipment and Supplies Manufacturing</b>	339944	Carbon Paper and Inked Ribbon Manufacturing
339112	Surgical and Medical Instrument Manufacturing	<b>33995</b>	<b>Sign Manufacturing</b>
339113	Surgical Appliance and Supplies Manufacturing (except facilities primarily engaged in manufacturing orthopedic devices to prescription in a retail environment )	339950	Sign Manufacturing
339114	Dental Equipment and Supplies Manufacturing	<b>33999</b>	<b>All Other Miscellaneous Manufacturing</b>
339115	Ophthalmic Goods Manufacturing (except lens grinding facilities that are primarily engaged in the retail sale of eyeglasses and contact lenses to prescription for individuals)	339991	Gasket, Packing, and Sealing Device Manufacturing
<b>3399</b>	<b>Other Miscellaneous Manufacturing</b>	339992	Musical Instrument Manufacturing
<b>33991</b>	<b>Jewelry and Silverware Manufacturing</b>	339993	Fastener, Button, Needle, and Pin Manufacturing
339910	Jewelry and Silverware Manufacturing	339994	Broom, Brush, and Mop Manufacturing
339912	Silverware and Hollowware Manufacturing	339995	Burial Casket Manufacturing
339913	Jewelers' Material and Lapidary Work Manufacturing	339999	All Other Miscellaneous Manufacturing
339914	Costume Jewelry and Novelty Manufacturing	113310	<b>Logging</b>
<b>33992</b>	<b>Sporting and Athletic Goods Manufacturing</b>	111998	<b>All Other Miscellaneous Crop Farming</b> (Limited to facilities primarily engaged in reducing maple sap to maple syrup)
339920	Sporting and Athletic Goods Manufacturing	211112	<b>Natural Gas Liquid Extraction</b> (limited to facilities that recover sulfur from natural gas)
<b>33993</b>	<b>Doll, Toy, and Game Manufacturing</b>	212324	<b>Kaolin and Ball Clay Mining</b> (limited to facilities operating without a mine or quarry and that are primarily engaged in beneficiating kaolin and clay)
339930	Doll Toy, and Game Manufacturing	212325	<b>Clay and Ceramic and Refractory Minerals Mining</b> (limited to facilities operating without a mine or quarry and that are primarily engaged in beneficiating clay and ceramic and refractory minerals)
		212393	<b>Other Chemical and Fertilizer Mineral Mining</b> (limited to facilities operating without a mine or quarry that are primarily engaged in beneficiating chemical or fertilizer mineral raw materials)

*Table I. NAICS Codes*

212399	<p><b>All Other Nonmetallic Mineral Mining</b> (limited to facilities operating without a mine or quarry that are primarily engaged in beneficiating nonmetallic minerals)</p>	811490	<p><b>Other Personal and Household Goods Repair and Maintenance (limited to facilities that are primarily engaged in repairing and servicing pleasure and sail boats without retailing new boats (previously classified under SIC 3732, Boat Building and Repairing (pleasure boat building))</b></p>
488390	<p><b>Other Support Activities for Water Transportation</b> (limited to facilities that are primarily engaged in providing routine repair and maintenance of ships and boats from floating drydocks)</p>		
511110	<p><b>Newspaper Publishers</b></p>		
511120	<p><b>Periodical Publishers</b></p>		
511130	<p><b>Book Publishers</b></p>		
511140	<p><b>Directory and Mailing List Publishers</b> (except Facilities that are primarily engaged in furnishing services for direct mail advertising including address list compilers, address list publishers, address list publishers and printing combined, address list publishing, business directory publishers, catalog of collections publishers, catalog of collections publishers and printing combined, mailing list compilers, directory compilers, and mailing list compiling services)</p>		
511191	<p><b>Greeting Card Publishers</b></p>		
511199	<p><b>All Other Publishers</b></p>		
512220	<p><b>Integrated Record Production/Distribution</b></p>		
512230	<p><b>Music Publishers</b> (except facilities primarily Engaged in Music copyright authorizing use, Music copyright buying and licensing, and Music publishers working on their own account)</p>		
519130	<p><b>Internet Publishing and Broadcasting and Web Search portals</b> (limited to facilities primarily engaged in Internet newspaper publishing, Internet periodical publishing, internet book publishing, Miscellaneous Internet publishing, Internet greeting card publishers except web search portals)</p>		
541712	<p><b>Research and Development in the Physical, Engineering, and Life Sciences (except Biotechnology)</b> (limited to facilities that are primarily engaged in Guided missile and space vehicle engine research and development, and in Guided missile and space vehicle parts (except engines) research and development)</p>		



Table II

**1.2 NAICS codes that correspond to SIC codes other than 20 through 39:**

<b>212</b>	<b>Mining (except Oil and Gas)</b>
<b>2121</b>	<b>Coal Mining</b>
212111	Bituminous Coal and Lignite Surface Mining
212112	Bituminous Coal Underground Mining
212113	Anthracite Mining
<b>2122</b>	<b>Metal Ore Mining</b>
212221	Gold Ore Mining
212222	Silver Ore Mining
212231	Lead Ore and Zinc Ore Mining
212234	Copper Ore and Nickel Ore Mining
212299	All Other Metal Ore Mining
<b>221</b>	<b>Utilities</b>
<b>22111</b>	<b>Electric Power Generation (limited to facilities that combust coal and/or oil for the purpose of generating power for distribution in commerce)</b>
221111	Hydroelectric Power Generation
221112	Fossil Fuel Electric Power Generation
221113	Nuclear Electric Power Generation
221118	Other Electric Power Generation
221121	Electric Bulk Power Transmission and Control
221122	Electric Power Distribution

221330	<b>Steam and Air Conditioning Supply</b> Limited to facilities engaged in providing combinations of electric, gas and other services, not elsewhere classified (NEC) (previously classified under SIC 4939, Combination Utility Services Not Elsewhere Classified.)
424690	<b>Other Chemical and Allied Products Merchant Wholesalers</b>
424710	<b>Petroleum Bulk Stations and Terminals</b>
425110	<b>Business to Business Electronic Markets</b> (limited to facilities previously classified in 5169, Chemicals and Allied Products, NEC)
425120	<b>Wholesale Trade Agents and Brokers</b> (limited to facilities previously classified in 5169, Chemicals and Allied Products, NEC)
562112	<b>Hazardous Waste Collection</b> (limited to facilities primarily engaged in solvent recovery services on a contract or fee basis)
562211	<b>Hazardous Waste Treatment and Disposal</b> (limited to facilities regulated under the Resource Conservation and Recovery Act, subtitle C, 42 U.S.C. 6921, <i>et seq.</i> )
562212	<b>Solid Waste Landfill</b> (limited to facilities regulated under the Resource Conservation and Recovery Act, subtitle C, 42 U.S.C. 6921, <i>et seq.</i> )
562213	<b>Solid Waste Combustors and Incinerators</b> (Limited to facilities regulated under the Resource Conservation and Recovery Act, subtitle C, 42 U.S.C. 6921 <i>et seq.</i> )
562219	<b>Other Nonhazardous Waste Treatment and Disposal</b> (Limited to facilities regulated under the Resource Conservation and Recovery Act, subtitle C, 42 U.S.C. 6921 <i>et seq.</i> )
562920	<b>Materials Recovery Facilities</b> (Limited to facilities regulated under the Resource Conservation and Recovery Act, subtitle C, 42 U.S.C. 6921 <i>et seq.</i> )

## Table II. EPCRA Section 313 Chemical List For Reporting Year 2014 (including Toxic Chemical Categories)

Individually listed EPCRA Section 313 chemicals with CAS numbers are arranged alphabetically starting on page II-3. Following the alphabetical list, the EPCRA Section 313 chemicals are arranged in CAS number order. Covered chemical categories follow.

Certain EPCRA Section 313 chemicals listed in Table II have parenthetical “qualifiers.” These qualifiers indicate that these EPCRA Section 313 chemicals are subject to the section 313 reporting requirements if manufactured, processed, or otherwise used in a specific form or when a certain activity is performed. The following chemicals are reportable only if they are manufactured, processed, or otherwise used in the specific form(s) listed below:

Chemical/ Chemical Category	CAS Number	Qualifier
<b>Aluminum</b> (fume or dust)	7429-90-5	<b>Only</b> if it is a fume or dust form.
<b>Aluminum oxide</b> (fibrous forms)	1344-28-1	<b>Only</b> if it is a fibrous form.
<b>Ammonia</b> (includes anhydrous ammonia and aqueous ammonia from water dissociable ammonium salts and other sources; 10 percent of total aqueous ammonia is reportable under this listing)	7664-41-7	<b>Only</b> 10% of aqueous forms. 100% of anhydrous forms.
<b>Asbestos</b> (friable)	1332-21-4	<b>Only</b> if it is a friable form.
<b>Hydrochloric acid</b> (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)	7647-01-0	<b>Only</b> if it is an aerosol form as defined.
<b>Nitrate compounds</b> (water dissociable; reportable only when in aqueous solution)	NA	<b>Only</b> if in aqueous solution
<b>Phosphorus</b> (yellow or white)	7723-14-0	<b>Only</b> if it is a yellow or white form.
<b>Sulfuric acid</b> (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)	7664-93-9	<b>Only</b> if it is an aerosol form as defined.
<b>Vanadium</b> (except when contained in an alloy)	7440-62-2	<b>Except</b> if it is contained in an alloy.
<b>Zinc</b> (fume or dust)	7440-66-6	<b>Only</b> if it is in a fume or dust form.

The qualifier for the following three chemicals is based on the chemical activity rather than the form of the chemical. These chemicals are subject to EPCRA section 313 reporting requirements only when the indicated activity is performed.

Chemical/ Chemical Category	CAS Number	Qualifier
<b>Dioxin and dioxin-like compounds</b> (manufacturing; and the processing or otherwise use of dioxin and dioxin-like compounds if the dioxin and dioxin-like compounds are present as contaminants in a chemical and if they were created during the manufacture of that chemical.)	NA	<b>Only</b> if they are manufactured at the facility; or are processed or otherwise used when present as contaminants in a chemical but only if they were created during the manufacture of that chemical.
<b>Isopropyl alcohol</b> (only persons who manufacture by the strong acid process are subject, no supplier notification)	67-63-0	<b>Only</b> if it is being manufactured by the strong acid process. Facilities that process or otherwise use isopropyl alcohol are <u>not</u> covered and should <u>not</u> file a report.
<b>Saccharin</b> (only persons who manufacture are subject, no supplier notification)	81-07-2	<b>Only</b> if it is being manufactured.

There are no supplier notification requirements for isopropyl alcohol and saccharin since the processors and users of these chemicals are not required to report. Manufacturers of these chemicals do not need to notify their customers that these are reportable EPCRA section 313 chemicals.

**Table II. EPCRA Section 313 Chemical List for Reporting Year 2014**

**Note:** Chemicals may be added to or deleted from the list. The Emergency Planning and Community Right-to-Know Call Center will provide up-to-date information on the status of these changes. See section B.3.c of the instructions for more information on the *de minimis* % limits listed below. There are no *de minimis* levels for PBT chemicals since the *de minimis* exemption is not available for these chemicals (an asterisk appears where a *de minimis* limit would otherwise appear in Table II). However, for purposes of the supplier notification requirement only, such limits are provided in Appendix D.

## Chemical Qualifiers

This table contains the list of individual EPCRA Section 313 chemicals and categories of chemicals subject to 2014 calendar year reporting. Some of the EPCRA Section 313 chemicals listed have parenthetical qualifiers listed next to them. An EPCRA Section 313 chemical that is listed without a qualifier is subject to reporting in all forms in which it is manufactured, processed, and otherwise used.

**Fume or dust.** Two of the metals on the list (aluminum and zinc) contain the qualifier “fume or dust.” Fume or dust refers to dry forms of these metals but does not refer to “wet” forms such as solutions or slurries. As explained in Section B.3.a of these instructions, the term manufacture includes the generation of an EPCRA Section 313 chemical as a byproduct or impurity. In such cases, a facility should determine if, for example, it generated more than 25,000 pounds of aluminum fume or dust in the reporting year as a result of its activities. If so, the facility must report that it manufactures “aluminum (fume or dust).” Similarly, there may be certain technologies in which one of these metals is processed in the form of a fume or dust to make other EPCRA Section 313 chemicals or other products for distribution in commerce. In reporting releases, the facility would only report releases of the fume or dust.

EPA considers dusts to consist of solid particles generated by any mechanical processing of materials including crushing, grinding, rapid impact, handling, detonation, and decrepitation of organic and inorganic materials such as rock, ore, and metal. Dusts do not tend to flocculate, except under electrostatic forces.

EPA considers a fume to be an airborne dispersion consisting of small solid particles created by condensation from a gaseous state, in distinction to a gas or vapor. Fumes arise from the heating of solids such as lead. The condensation is often accompanied by a chemical reaction, such as oxidation. Fumes flocculate and sometimes coalesce.

**Manufacturing qualifiers.** Two of the entries in the EPCRA Section 313 chemical list contain a qualifier relating to manufacture. For isopropyl alcohol, the qualifier is “only persons who manufacture by the strong acid process are subject, no supplier notification.” For saccharin, the qualifier is “only persons who manufacture are subject, no supplier notification.” For isopropyl alcohol, the qualifier means that only facilities manufacturing isopropyl alcohol by the strong acid process are required to report. In the case of saccharin, only manufacturers of the EPCRA Section 313 chemical are subject to the reporting requirements. A facility that only processes or otherwise uses either of these EPCRA Section 313 chemicals is not required to report for these EPCRA Section 313 chemicals. In both cases,

supplier notification does not apply because only manufacturers, not users, of these two EPCRA Section 313 chemicals must report.

**Ammonia (includes anhydrous ammonia and aqueous ammonia from water dissociable ammonium salts and other sources; 10 percent of total aqueous ammonia is reportable under this listing).** The qualifier for ammonia means that anhydrous forms of ammonia are 100% reportable and aqueous forms are limited to 10% of total aqueous ammonia. Therefore when determining threshold and releases and other waste management quantities all anhydrous ammonia is included but only 10% of total aqueous ammonia is included. Any evaporation of ammonia from aqueous ammonia solutions is considered anhydrous ammonia and should be included in threshold determinations and release and other waste management calculations.

**Sulfuric acid and Hydrochloric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size).** The qualifier for sulfuric acid and hydrochloric acid means that the only forms of these chemicals that are reportable are airborne forms. Aqueous solutions are not covered by this listing but any aerosols generated from aqueous solutions are covered.

**Nitrate compounds (water dissociable; reportable only when in aqueous solution).** The qualifier for the nitrate compounds category limits the reporting to nitrate compounds that dissociate in water, generating nitrate ion. For the purposes of threshold determinations the entire weight of the nitrate compound must be included in all calculations. For the purposes of reporting releases and other waste management quantities only the weight of the nitrate ion should be included in the calculations of these quantities.

**Phosphorus (yellow or white).** The listing for phosphorus is qualified by the term “yellow or white.” This means that only manufacturing, processing, or otherwise use of phosphorus in the yellow or white chemical form triggers reporting. Conversely, manufacturing, processing, or otherwise use of “black” or “red” phosphorus does not trigger reporting. Supplier notification also applies only to distribution of yellow or white phosphorus.

**Asbestos (friable).** The listing for asbestos is qualified by the term “friable,” referring to the physical characteristic of being able to be crumbled, pulverized, or reducible to a powder with hand pressure. Only manufacturing, processing, or otherwise use of asbestos in the friable form triggers reporting. Supplier notification applies only to distribution of mixtures or other trade name products containing friable asbestos.

**Table II. EPCRA Section 313 Chemical List for Reporting Year 2014**

**Aluminum Oxide (fibrous forms).** The listing for aluminum oxide is qualified by the term “fibrous forms.” Fibrous refers to a man-made form of aluminum oxide that is processed to produce strands or filaments which can be cut to various lengths depending on the application. Only manufacturing, processing, or otherwise use of aluminum oxide in the fibrous form triggers reporting. Supplier notification applies only to distribution of mixtures or other trade name products containing fibrous forms of aluminum oxide.

**Notes for Sections A and B of following list of TRI chemicals:**

“Color Index” indicated by “C.I.”

\* There are no *de minimis* levels for PBT chemicals, except for supplier notification purposes (see Appendix D).

**a. Individually-Listed Toxic Chemicals Arranged Alphabetically**

CAS Number	Chemical Name	<i>De minimus</i> % Limit
71751-41-2	Abamectin [Avermectin B1]	1.0
30560-19-1	Acephate (Acetylphosphoramidothioic acid O,S-dimethyl ester)	1.0
75-07-0	Acetaldehyde	0.1
60-35-5	Acetamide	0.1
75-05-8	Acetonitrile	1.0
98-86-2	Acetophenone	1.0
53-96-3	2-Acetylaminofluorene	0.1
62476-59-9	Acifluorfen, sodium salt [5-(2-Chloro-4-(trifluoromethyl)phenoxy)-2-nitrobenzoic acid, sodium salt]	1.0
107-02-8	Acrolein	1.0
79-06-1	Acrylamide	0.1
79-10-7	Acrylic acid	1.0
107-13-1	Acrylonitrile	0.1
15972-60-8	Alachlor	1.0
116-06-3	Aldicarb	1.0
309-00-2	Aldrin	*
	[1,4:5,8-Dimethanonaphthalene, 1,2,3,4,10,10-hexachloro-1,4,4a,5,8,8a-hexahydro-(1.alpha.,4.alpha.,4a.beta.,5.alpha.,8.alpha.,8a.beta.)-]	
28057-48-9	d-trans-Allethrin [d-trans-Chrysanthemic acid of d-allethrine]	1.0
107-18-6	Allyl alcohol	1.0
107-11-9	Allylamine	1.0
107-05-1	Allyl chloride	1.0
7429-90-5	Aluminum (fume or dust)	1.0
20859-73-8	Aluminum phosphide	1.0
1344-28-1	Aluminum oxide (fibrous forms)	1.0

CAS Number	Chemical Name	<i>De minimus</i> % Limit
834-12-8	Ametryn (N-Ethyl-N=(1-methylethyl)-6-(methylthio)-1,3,5-triazine-2,4-diamine)	1.0
117-79-3	2-Aminoanthraquinone	0.1
60-09-3	4-Aminoazobenzene	0.1
92-67-1	4-Aminobiphenyl	0.1
82-28-0	1-Amino-2-methylanthraquinone	0.1
81-49-2	1-Amino-2,4-dibromoanthraquinone	0.1
33089-61-1	Amitraz	1.0
61-82-5	Amitrole	0.1
7664-41-7	Ammonia (includes anhydrous ammonia and aqueous ammonia from water dissociable ammonium salts and other sources; 10 percent of total aqueous ammonia is reportable under this listing)	1.0
101-05-3	Anilazine [4,6-Dichloro-N-(2-chlorophenyl)-1,3,5-triazin-2-amine]	1.0
62-53-3	Aniline	1.0
90-04-0	o-Anisidine	0.1
104-94-9	p-Anisidine	1.0
134-29-2	o-Anisidine hydrochloride	0.1
120-12-7	Anthracene	1.0
7440-36-0	Antimony	1.0
7440-38-2	Arsenic	0.1
1332-21-4	Asbestos (friable)	0.1
1912-24-9	Atrazine (6-Chloro-N-ethyl-N=(1-methylethyl)-1,3,5-triazine-2,4-diamine)	1.0
7440-39-3	Barium	1.0
22781-23-3	Bendiocarb [2,2-Dimethyl-1,3-benzodioxol-4-ol methylcarbamate]	1.0
1861-40-1	Benfluralin (N-Butyl-N-ethyl-2,6-dinitro-4-(trifluoromethyl)benzenamine)	1.0
17804-35-2	Benomyl	1.0
98-87-3	Benzal chloride	1.0
55-21-0	Benzamide	1.0
71-43-2	Benzene	0.1
92-87-5	Benidine	0.1
98-07-7	Benzoic trichloride (Benzotrichloride)	0.1
191-24-2	Benzo(g,h,i)perylene	*
98-88-4	Benzoyl chloride	1.0
94-36-0	Benzoyl peroxide	1.0
100-44-7	Benzyl chloride	1.0
7440-41-7	Beryllium	0.1
82657-04-3	Bifenthrin	1.0
92-52-4	Biphenyl	1.0
3296-90-0	2,2-bis(Bromomethyl)-1,3-propanediol	0.1
111-91-1	Bis(2-chloroethoxy) methane	1.0

Table II. EPCRA Section 313 Chemical List for Reporting Year 2014

CAS Number	Chemical Name	De minimus % Limit	CAS Number	Chemical Name	De minimus % Limit
111-44-4	Bis(2-chloroethyl) ether	1.0	133-90-4	Chloramben	1.0
542-88-1	Bis(chloromethyl) ether	0.1		[Benzoic acid, 3-amino-2,5-dichloro-]	
108-60-1	Bis(2-chloro-1-methylethyl) ether	1.0	57-74-9	Chlordane	*
56-35-9	Bis(tributyltin) oxide	1.0		[4,7-Methanoindan, 1,2,4,5,6,7,8,8-octachloro-2,3,3a,4,7,7a-hexahydro-]	
10294-34-5	Boron trichloride	1.0	115-28-6	Chlorendic acid	0.1
7637-07-2	Boron trifluoride	1.0	90982-32-4	Chlorimuron ethyl	1.0
314-40-9	Bromacil	1.0		[Ethyl-2-[[[(4-chloro-6-methoxyprimidin-2-yl)amino]carbonyl]amino]sulfonyl] benzoate]	
	(5-Bromo-6-methyl-3-(1-methylpropyl)-2,4(1H,3H)-pyrimidinedione)		7782-50-5	Chlorine	1.0
53404-19-6	Bromacil, lithium salt	1.0	10049-04-4	Chlorine dioxide	1.0
	[2,4(1H,3H)-Pyrimidinedione,5-bromo-6-methyl-3-(1-methylpropyl), lithium salt]		79-11-8	Chloroacetic acid	1.0
7726-95-6	Bromine	1.0	532-27-4	2-Chloroacetophenone	1.0
35691-65-7	1-Bromo-1-(bromomethyl)-propanedicarbonitrile	1.0	4080-31-3	1-(3-Chloroallyl)-3,5,7-triazol-1-azoniaadamantane chloride	1.0
353-59-3	Bromochlorodifluoromethane (Halon 1211)	1.0	106-47-8	p-Chloroaniline	0.1
75-25-2	Bromoform (Tribromomethane)	1.0	108-90-7	Chlorobenzene	1.0
74-83-9	Bromomethane (Methyl bromide)	1.0	510-15-6	Chlorobenzilate	1.0
75-63-8	Bromotrifluoromethane (Halon 1301)	1.0		[Benzeneacetic acid, 4-chloro-.alpha.- (4-chlorophenyl)-.alpha.-hydroxy-, ethyl ester]	
1689-84-5	Bromoxynil	1.0	75-68-3	1-Chloro-1,1-difluoroethane (HCFC-142b)	1.0
	(3,5-Dibromo-4-hydroxybenzonitrile)		75-45-6	Chlorodifluoromethane (HCFC-22)	1.0
1689-99-2	Bromoxynil octanoate	1.0		(Octanoic acid, 2,6-dibromo-4-cyanophenylester)	
357-57-3	Brucine	1.0	75-00-3	Chloroethane (Ethyl chloride)	1.0
106-99-0	1,3-Butadiene	0.1	67-66-3	Chloroform	0.1
141-32-2	Butyl acrylate	1.0	74-87-3	Chloromethane (Methyl chloride)	1.0
71-36-3	n-Butyl alcohol	1.0	107-30-2	Chloromethyl methyl ether	0.1
78-92-2	sec-Butyl alcohol	1.0	563-47-3	3-Chloro-2-methyl-1-propene	0.1
75-65-0	tert-Butyl alcohol	1.0	104-12-1	p-Chlorophenyl isocyanate	1.0
106-88-7	1,2-Butylene oxide	0.1	76-06-2	Chloropicrin	1.0
123-72-8	Butyraldehyde	1.0	126-99-8	Chloroprene	0.1
7440-43-9	Cadmium	0.1	542-76-7	3-Chloropropionitrile	1.0
156-62-7	Calcium cyanamide	1.0	63938-10-3	Chlorotetrafluoroethane	1.0
133-06-2	Captan	1.0	354-25-6	1-Chloro-1,1,2,2-tetrafluoroethane (HCFC-124a)	1.0
	[1H-Isoindole-1,3(2H)-dione, 3a,4,7,7a-tetrahydro-2-[(trichloromethyl)thio]-]		2837-89-0	2-Chloro-1,1,1,2-tetrafluoroethane (HCFC-124)	1.0
63-25-2	Carbaryl [1-Naphthalenol, methylcarbamate]	1.0	1897-45-6	Chlorothalonil	0.1
1563-66-2	Carbofuran	1.0		[1,3-Benzenedicarbonitrile, 2,4,5,6-tetrachloro-]	
75-15-0	Carbon disulfide	1.0	95-69-2	p-Chloro-o-toluidine	0.1
56-23-5	Carbon tetrachloride	0.1	75-88-7	2-Chloro-1,1,1-trifluoroethane (HCFC-133a)	1.0
463-58-1	Carbonyl sulfide	1.0	75-72-9	Chlorotrifluoromethane (CFC-13)	1.0
5234-68-4	Carboxin	1.0	460-35-5	3-Chloro-1,1,1-trifluoropropane (HCFC-253fb)	1.0
	(5,6-Dihydro-2-methyl-N-phenyl-1,4-oxathiin-3-carboxamide)		5598-13-0	Chlorpyrifos methyl	1.0
120-80-9	Catechol	0.1		[O,O-Dimethyl-O-(3,5,6-trichloro-2-pyridyl)phosphorothioate]	
2439-01-2	Chinomethionat	1.0			
	[6-Methyl-1,3-dithiolo[4,5-b]quinoxalin-2-one]				

**Table II. EPCRA Section 313 Chemical List for Reporting Year 2014**

CAS Number	Chemical Name	De minimus % Limit
64902-72-3	Chlorsulfuron [2-Chloro-N-[[[4-methoxy-6-methyl-1,3,5-triazin-2-yl)amino]carbonyl]benzenesulfonamide]	1.0
7440-47-3	Chromium	1.0
4680-78-8	C.I. Acid Green 3	1.0
6459-94-5	C.I. Acid Red 114	0.1
569-64-2	C.I. Basic Green 4	1.0
989-38-8	C.I. Basic Red 1	1.0
1937-37-7	C.I. Direct Black 38	0.1
2602-46-2	C.I. Direct Blue 6	0.1
28407-37-6	C.I. Direct Blue 218	1.0
16071-86-6	C.I. Direct Brown 95	0.1
2832-40-8	C.I. Disperse Yellow 3	1.0
3761-53-3	C.I. Food Red 5	0.1
81-88-9	C.I. Food Red 15	1.0
3118-97-6	C.I. Solvent Orange 7	1.0
97-56-3	C.I. Solvent Yellow 3	0.1
842-07-9	C.I. Solvent Yellow 14	1.0
492-80-8	C.I. Solvent Yellow 34 (Auramine)	0.1
128-66-5	C.I. Vat Yellow 4	1.0
7440-48-4	Cobalt	0.1
7440-50-8	Copper	1.0
8001-58-9	Creosote	0.1
120-71-8	p-Cresidine	0.1
108-39-4	m-Cresol	1.0
95-48-7	o-Cresol	1.0
106-44-5	p-Cresol	1.0
1319-77-3	Cresol (mixed isomers)	1.0
4170-30-3	Crotonaldehyde	1.0
98-82-8	Cumene	1.0
80-15-9	Cumene hydroperoxide	1.0
135-20-6	[Benzeneamine, N-hydroxy- N-nitroso, ammonium salt]	0.1
21725-46-2	Cyanazine	1.0
1134-23-2	Cycloate	1.0
110-82-7	Cyclohexane	1.0
108-93-0	Cyclohexanol	1.0
68359-37-5	Cyfluthrin [3-(2,2-Dichloroethenyl)-2,2-dimethylcyclopropanecarboxylic acid, cyano(4-fluoro-3-phenoxyphenyl) methyl ester]	1.0
68085-85-8	Cyhalothrin [3-(2-Chloro-3,3,3-trifluoro-1-propenyl)-2,2-dimethylcyclopropane-carboxylic acid cyano(3-phenoxyphenyl)methyl ester]	1.0
94-75-7	2,4-D [Acetic acid, (2,4-dichlorophenoxy)-]	0.1
533-74-4	Dazomet (Tetrahydro-3,5-dimethyl-2H-1,3,5-thiadiazine-2-thione)	1.0

CAS Number	Chemical Name	De minimus % Limit
53404-60-7	Dazomet, sodium salt [Tetrahydro-3,5-dimethyl-2H-1,3,5-thiadiazine-2-thione, ion(1-), sodium]	1.0
94-82-6	2,4-DB	1.0
1929-73-3	2,4-D butoxyethyl ester	0.1
94-80-4	2,4-D butyl ester	0.1
2971-38-2	2,4-D chlorocrotyl ester	0.1
1163-19-5	Decabromodiphenyl oxide	1.0
13684-56-5	Desmedipham	1.0
1928-43-4	2,4-D 2-ethylhexyl ester	0.1
53404-37-8	2,4-D 2-ethyl-4- methylpentyl ester	0.1
2303-16-4	Diallate [Carbamothioic acid, bis(1-methylethyl)-S-(2,3-dichloro-2-propenyl) ester]	1.0
615-05-4	2,4-Diaminoanisole	0.1
39156-41-7	2,4-Diaminoanisole sulfate	0.1
101-80-4	4,4'-Diaminodiphenyl ether	0.1
95-80-7	2,4-Diaminotoluene	0.1
25376-45-8	Diaminotoluene (mixed isomers)	0.1
333-41-5	Diazinon	1.0
334-88-3	Diazomethane	1.0
132-64-9	Dibenzofuran	1.0
96-12-8	1,2-Dibromo-3- chloropropane (DBCP)	0.1
106-93-4	1,2-Dibromoethane (Ethylene dibromide)	0.1
124-73-2	Dibromotetrafluoroethane (Halon 2402)	1.0
84-74-2	Dibutyl phthalate	1.0
1918-00-9	Dicamba (3,6-Dichloro-2-methoxybenzoic acid)	1.0
99-30-9	Dichloran [2,6-Dichloro-4-nitroaniline]	1.0
95-50-1	1,2-Dichlorobenzene	1.0
541-73-1	1,3-Dichlorobenzene	1.0
106-46-7	1,4-Dichlorobenzene	0.1
25321-22-6	Dichlorobenzene (mixed isomers)	0.1
91-94-1	3,3'-Dichlorobenzidine	0.1
612-83-9	3,3'-Dichlorobenzidine dihydrochloride	0.1
64969-34-2	3,3'-Dichlorobenzidine sulfate	0.1
75-27-4	Dichlorobromomethane	0.1
764-41-0	1,4-Dichloro-2-butene	1.0
110-57-6	trans-1,4-Dichloro-2-butene	1.0
1649-08-7	1,2-Dichloro-1,1- difluoroethane (HCFC-132b)	1.0
75-71-8	Dichlorodifluoromethane (CFC-12)	1.0
107-06-2	1,2-Dichloroethane (Ethylene dichloride)	0.1
540-59-0	1,2-Dichloroethylene	1.0
1717-00-6	1,1-Dichloro-1-fluoroethane (HCFC-141b)	1.0

**Table II. EPCRA Section 313 Chemical List for Reporting Year 2014**

CAS Number	Chemical Name	De minimus % Limit	CAS Number	Chemical Name	De minimus % Limit
75-43-4	Dichlorofluoromethane (HCFC-21)	1.0	115-32-2	Dicofol [Benzenemethanol, 4-chloro-.alpha]	1.0
75-09-2	Dichloromethane (Methylene chloride)	0.1	77-73-6	Dicyclopentadiene	1.0
127564-92-5	Dichloropentafluoropropane	1.0	1464-53-5	Diepoxybutane	0.1
13474-88-9	1,1-Dichloro-1,2,2,3,3-pentafluoropropane (HCFC-225cc)	1.0	111-42-2	Diethanolamine	1.0
111512-56-2	1,1-Dichloro-1,2,3,3,3-pentafluoropropane (HCFC-225eb)	1.0	38727-55-8	Diethyl ethyl	1.0
422-44-6	1,2-Dichloro-1,1,2,3,3-pentafluoropropane (HCFC-225bb)	1.0	117-81-7	Di(2-ethylhexyl) phthalate (DEHP)	0.1
431-86-7	1,2-Dichloro-1,1,3,3,3-pentafluoropropane (HCFC-225da)	1.0	64-67-5	Diethyl sulfate	0.1
507-55-1	1,3-Dichloro-1,1,2,2,3-pentafluoropropane (HCFC-225cb)	1.0	35367-38-5	Diflubenzuron	1.0
136013-79-1	1,3-Dichloro-1,1,2,3,3-pentafluoropropane (HCFC-225ea)	1.0	101-90-6	Diglycidyl resorcinol ether	0.1
128903-21-9	2,2-Dichloro-1,1,1,3,3-pentafluoropropane (HCFC-225aa)	1.0	94-58-6	Dihydrosafrole	0.1
422-48-0	pentafluoropropane (HCFC-225ba)	1.0	55290-64-7	Dimethipin [2,3-Dihydro-5,6-dimethyl-1,4-dithiin 1,1,4,4-tetraoxide]	1.0
422-56-0	3,3-Dichloro-1,1,1,2,2-pentafluoropropane (HCFC-225ca)	1.0	60-51-5	Dimethoate	1.0
97-23-4	Dichlorophene [2,2'-Methylenebis(4-chlorophenol)]	1.0	119-90-4	3,3'-Dimethoxybenzidine	0.1
120-83-2	2,4-Dichlorophenol	1.0	20325-40-0	3,3'-Dimethoxybenzidine dihydrochloride (o-Dianisidine dihydrochloride)	0.1
78-87-5	1,2-Dichloropropane	1.0	111984-09-9	3,3'-Dimethoxybenzidine hydrochloride (o-Dianisidine hydrochloride)	0.1
10061-02-6	trans-1,3-Dichloropropene	0.1	124-40-3	Dimethylamine	1.0
78-88-6	2,3-Dichloropropene	1.0	2300-66-5	Dimethylamine dicamba	1.0
542-75-6	1,3-Dichloropropylene	0.1	60-11-7	4-Dimethylaminoazobenzene	0.1
76-14-2	Dichlorotetrafluoroethane (CFC-114)	1.0	121-69-7	N,N-Dimethylaniline	1.0
34077-87-7	Dichlorotrifluoroethane	1.0	119-93-7	3,3'-Dimethylbenzidine (o-Tolidine)	0.1
90454-18-5	Dichloro-1,1,2-trifluoroethane	1.0	612-82-8	3,3'-Dimethylbenzidine dihydrochloride (o-Tolidine dihydrochloride)	0.1
812-04-4	1,1-Dichloro-1,2,2-trifluoroethane (HCFC-123b)	1.0	41766-75-0	3,3'-Dimethylbenzidine dihydrofluoride (o-Tolidine dihydrofluoride)	0.1
354-23-4	1,2-Dichloro-1,1,2-trifluoroethane (HCFC-123a)	1.0	79-44-7	Dimethylcarbamyl chloride	0.1
306-83-2	2,2-Dichloro-1,1,1-trifluoroethane (HCFC-123)	1.0	2524-03-0	Dimethyl chlorothiophosphate	1.0
62-73-7	Dichlorvos [Phosphoric acid, 2,2-dichloroethenyl dimethyl ester]	0.1	68-12-2	N,N-Dimethylformamide	1.0
51338-27-3	Diclofop methyl [2-[4-(2,4-Dichlorophenoxy)phenoxy]propanoic acid, methyl ester]	1.0	57-14-7	1,1-Dimethyl hydrazine	0.1
			105-67-9	2,4-Dimethylphenol	1.0
			131-11-3	Dimethyl phthalate	1.0
			77-78-1	Dimethyl sulfate	0.1
			99-65-0	m-Dinitrobenzene	1.0
			528-29-0	o-Dinitrobenzene	1.0
			100-25-4	p-Dinitrobenzene	1.0
			88-85-7	Dinitrobutyl phenol (Dinoseb)	1.0
			534-52-1	4,6-Dinitro-o-cresol	1.0
			51-28-5	2,4-Dinitrophenol	1.0
			121-14-2	2,4-Dinitrotoluene	0.1
			606-20-2	2,6-Dinitrotoluene	0.1
			25321-14-6	Dinitrotoluene (mixed isomers)	1.0
			39300-45-3	Dinocap	1.0
			123-91-1	1,4-Dioxane	0.1
			957-51-7	Diphenamid	1.0
			122-39-4	Diphenylamine	1.0
			122-66-7	1,2-Diphenylhydrazine (Hydrazobenzene)	0.1

**Table II. EPCRA Section 313 Chemical List for Reporting Year 2014**

CAS Number	Chemical Name	De minimus % Limit
2164-07-0	Dipotassium endothall [7-Oxabicyclo(2.2.1)heptane-2,3-dicarboxylic acid, dipotassium salt]	1.0
136-45-8	Dipropyl isocinchomeronate	1.0
138-93-2	Disodium cyanodithioimidocarbonate	1.0
94-11-1	2,4-D isopropyl ester	0.1
541-53-7	2,4-Dithiobiuret	1.0
330-54-1	Diuron	1.0
2439-10-3	Dodine [Dodecylguanidine monoacetate]	1.0
120-36-5	2,4-DP	0.1
1320-18-9	2,4-D propylene glycol butyl ether ester	0.1
2702-72-9	2,4-D sodium salt	0.1
106-89-8	Epichlorohydrin	0.1
13194-48-4	Ethoprop [Phosphorodithioic acid O-ethyl S,S-dipropyl ester]	1.0
110-80-5	2-Ethoxyethanol	1.0
140-88-5	Ethyl acrylate	0.1
100-41-4	Ethylbenzene	0.1
541-41-3	Ethyl chloroformate	1.0
759-94-4	Ethyl dipropylthiocarbamate (EPTC)	1.0
74-85-1	Ethylene	1.0
107-21-1	Ethylene glycol	1.0
151-56-4	Ethyleneimine (Aziridine)	0.1
75-21-8	Ethylene oxide	0.1
96-45-7	Ethylene thiourea	0.1
75-34-3	Ethylidene dichloride	1.0
52-85-7	Famphur	1.0
60168-88-9	Fenarimol [.alpha.-(2-Chlorophenyl)-.alpha.-(4-chlorophenyl)-5-pyrimidinemethanol]	1.0
13356-08-6	Fenbutatin oxide (Hexakis(2-methyl-2-phenylpropyl) distannoxane)	1.0
66441-23-4	Fenoxaprop ethyl [2-(4-((6-Chloro-2-benzoxazolyl)oxy)phenoxy)propionic acid, ethyl ester]	1.0
72490-01-8	Fenoxycarb [[2-(4-Phenoxyphenoxy)ethyl]carbamic acid ethyl ester]	1.0
39515-41-8	Fenpropathrin [2,2,3,3-Tetramethylcyclopropane carboxylic acid cyano(3-phenoxyphenyl)methyl ester]	1.0
55-38-9	Fenthion [O,O-Dimethyl O-[3-methyl-4-(methylthio)phenyl] ester, phosphorothioic acid]	1.0

CAS Number	Chemical Name	De minimus % Limit
51630-58-1	Fenvalerate [4-Chloro-alpha-(1-methylethyl)benzeneacetic acid cyano(3-phenoxyphenyl) methyl ester]	1.0
14484-64-1	Ferbam [Tris(dimethylcarbamodithioato-S,S')iron]	1.0
69806-50-4	Fluazifop butyl [2-[4-[[5-(Trifluoromethyl)-2-pyridinyl]oxy]phenoxy]propanoic acid, butyl ester]	1.0
2164-17-2	Fluometuron [Urea, N,N-dimethyl-N=[3-(trifluoromethyl)phenyl]-]	1.0
7782-41-4	Fluorine	1.0
51-21-8	Fluorouracil (5-Fluorouracil)	1.0
69409-94-5	Fluvalinate [N-[2-Chloro-4-(trifluoromethyl)phenyl]-DL-valine(+)-cyano(3-phenoxyphenyl)methyl ester]	1.0
133-07-3	Folpet	1.0
72178-02-0	Fomesafen [5-(2-Chloro-4-(trifluoromethyl)phenoxy)-N-methylsulfonyl-2-nitrobenzamide]	1.0
50-00-0	Formaldehyde	0.1
64-18-6	Formic acid	1.0
76-13-1	Freon 113 [Ethane, 1,1,2-trichloro-1,2,2,-trifluoro-]	1.0
110-00-9	Furan	0.1
556-52-5	Glycidol	0.1
76-44-8	Heptachlor [1,4,5,6,7,8,8-Heptachloro-3a,4,7,7a-tetrahydro-4,7-methano-1H-indene]	*
118-74-1	Hexachlorobenzene	*
87-68-3	Hexachloro-1,3-butadiene	1.0
319-84-6	alpha-Hexachlorocyclohexane	0.1
77-47-4	Hexachlorocyclopentadiene	1.0
67-72-1	Hexachloroethane	0.1
1335-87-1	Hexachloronaphthalene	1.0
70-30-4	Hexachlorophene	1.0
680-31-9	Hexamethylphosphoramide	0.1
110-54-3	n-Hexane	1.0
51235-04-2	Hexazinone	1.0
67485-29-4	Hydramethylnon [Tetrahydro-5,5-dimethyl-2(1H)-pyrimidinone[3-[4-(trifluoromethyl)phenyl]-1-[2-[4-(trifluoromethyl)phenyl]ethenyl]-2-propenylidene]hydrazone]	1.0
302-01-2	Hydrazine	0.1
10034-93-2	Hydrazine sulfate	0.1



Table II. EPCRA Section 313 Chemical List for Reporting Year 2014

CAS Number	Chemical Name	De minimus % Limit	CAS Number	Chemical Name	De minimus % Limit
7647-01-0	Hydrochloric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)	1.0	20354-26-1	Methazole	1.0
74-90-8	Hydrogen cyanide	1.0	2032-65-7	[2-(3,4-Dichlorophenyl)-4-methyl-1,2,4-oxadiazolidine-3,5-dione]	1.0
7664-39-3	Hydrogen fluoride	1.0	94-74-6	Methiocarb	0.1
7783-06-4	Hydrogen sulfide	1.0		Methoxone	0.1
123-31-9	Hydroquinone	1.0		((4-Chloro-2-methylphenoxy) acetic acid) (MCPA)	
35554-44-0	Imazalil	1.0	3653-48-3	Methoxone sodium salt	0.1
	[1-[2-(2,4-Dichlorophenyl)-2-(2-propenyloxy)ethyl]-1H-imidazole]			((4-Chloro-2-methylphenoxy) acetate sodium salt)	
55406-53-6	3-Iodo-2-propynyl butylcarbamate	1.0	72-43-5	Methoxychlor	*
13463-40-6	Iron pentacarbonyl	1.0		[Benzene, 1,1'-(2,2,2-trichloroethylidene)bis[4-methoxy-]]	
78-84-2	Isobutyraldehyde	1.0	109-86-4	2-Methoxyethanol	1.0
465-73-6	Isodrin	*	96-33-3	Methyl acrylate	1.0
25311-71-1	Isofenphos[2-[[Ethoxyl[(1-methylethyl)amino]phosphinothioyl]oxy] benzoic acid 1-methylethyl ester]	1.0	1634-04-4	Methyl tert-butyl ether	1.0
78-79-5	Isoprene	0.1	79-22-1	Methyl chlorocarbonate	1.0
67-63-0	Isopropyl alcohol (only persons who manufacture by the strong acid process are subject, no supplier notification)	1.0	101-14-4	4,4'-Methylenebis(2-chloroaniline) (MBOCA)	0.1
80-05-7	4,4'-Isopropylidenediphenol	1.0	101-61-1	4,4'-Methylenebis(N,N-dimethyl) benzenamine	0.1
120-58-1	Isosafrole	1.0	74-95-3	Methylene bromide	1.0
77501-63-4	[Benzoic acid, 5-[2-Chloro-4-(trifluoromethyl)phenoxy]-2-nitro-, 2-ethoxy-1-methyl-2-oxoethyl ester]	1.0	101-77-9	4,4'-Methylenedianiline	0.1
7439-92-1	Lead (when lead is contained in stainless steel, brass or bronze alloys the <i>de minimis</i> level is 0.1)	*	93-15-2	Methyleugenol	0.1
58-89-9	Lindane	0.1	60-34-4	Methyl hydrazine	1.0
	[Cyclohexane, 1,2,3,4,5,6-hexachloro-, (1.alpha.,2.alpha.,3.beta.,4.alpha.,5.alpha., 6.beta.)-]		74-88-4	Methyl iodide	1.0
330-55-2	Linuron	1.0	108-10-1	Methyl isobutyl ketone	1.0
554-13-2	Lithium carbonate	1.0	624-83-9	Methyl isocyanate	1.0
121-75-5	Malathion	1.0	556-61-6	Methyl isothiocyanate	1.0
108-31-6	Maleic anhydride	1.0		[Isothiocyanatomethane]	
109-77-3	Malononitrile	1.0	75-86-5	2-Methylacetonitrile	1.0
12427-38-2	Maneb	1.0	80-62-6	Methyl methacrylate	1.0
	[Carbamodithioic acid, 1,2-ethanediybis-, manganese complex]		924-42-5	N-Methylolacrylamide	1.0
7439-96-5	Manganese	1.0	298-00-0	Methyl parathion	1.0
93-65-2	Mecoprop	0.1	109-06-8	2-Methylpyridine	1.0
149-30-4	2-Mercaptobenzothiazole (MBT)	1.0	872-50-4	N-Methyl-2-pyrrolidone	1.0
7439-97-6	Mercury	*	9006-42-2	Metiram	1.0
150-50-5	Merphos	1.0	21087-64-9	Metribuzin	1.0
126-98-7	Methacrylonitrile	1.0	7786-34-7	Mevinphos	1.0
137-42-8	Metham sodium (Sodium methylthiocarbamate)	1.0	90-94-8	Michler's ketone	0.1
67-56-1	Methanol	1.0	2212-67-1	Molinate	1.0
				(1H-Azepine-1-carbothioic acid, hexahydro-, S-ethyl ester)	
			1313-27-5	Molybdenum trioxide	1.0
			76-15-3	(CFC-115)	1.0
			150-68-5	Monuron	1.0
			505-60-2	[Ethane, 1,1'-thiobis[2-chloro-]]	0.1
			88671-89-0	Myclobutanil	1.0
				[.alpha.-Butyl-.alpha.-(4-chlorophenyl)-1H-1,2,4-triazole-1-propanenitrile]	
			142-59-6	Nabam	1.0
			300-76-5	Naled	1.0
			91-20-3	Naphthalene	0.1
			134-32-7	alpha-Naphthylamine	0.1
			91-59-8	beta-Naphthylamine	0.1
			7440-02-0	Nickel	0.1

**Table II. EPCRA Section 313 Chemical List for Reporting Year 2014**

CAS Number	Chemical Name	De minimus % Limit	CAS Number	Chemical Name	De minimus % Limit
1929-82-4	Nitrapyrin (2-Chloro-6-(trichloromethyl)pyridine)	1.0	56-38-2	Parathion [Phosphorothioic acid, O,O-diethyl-O-(4-nitrophenyl)ester]	1.0
7697-37-2	Nitric acid	1.0	1114-71-2	Pebulate [Butylethylcarbamothioic acid S-propyl ester]	1.0
139-13-9	Nitriiotriacetic acid	0.1	40487-42-1	Pendimethalin [N-(1-Ethylpropyl)-3,4-dimethyl-2,6-dinitrobenzenamine]	*
100-01-6	p-Nitroaniline	1.0	608-93-5	Pentachlorobenzene	*
91-23-6	o-Nitroanisole	0.1	76-01-7	Pentachloroethane	1.0
99-59-2	5-Nitro-o-anisidine	1.0	87-86-5	Pentachlorophenol (PCP)	0.1
98-95-3	Nitrobenzene	0.1	57-33-0	Pentobarbital sodium	1.0
92-93-3	4-Nitrobiphenyl	0.1	79-21-0	Peracetic acid	1.0
1836-75-5	Nitrofen [Benzene, 2,4-dichloro-1-(4-nitrophenoxy)-]	0.1	594-42-3	Perchloromethyl mercaptan	1.0
51-75-2	Nitrogen mustard [2-Chloro-N-(2-chloroethyl)-N-methylethanamine]	0.1	52645-53-1	Permethrin [3-(2,2-Dichloroethenyl)-2,2-dimethylcyclopropanecarboxylic acid, (3-phenoxyphenyl) methyl ester]	1.0
55-63-0	Nitroglycerin	1.0	85-01-8	Phenanthrene	1.0
75-52-5	Nitromethane	0.1	108-95-2	Phenol	1.0
88-75-5	2-Nitrophenol	1.0	77-09-8	Phenolphthalein	0.1
100-02-7	4-Nitrophenol	1.0	26002-80-2	Phenothrin [2,2-Dimethyl-3-(2-methyl-1-propenyl)cyclopropanecarboxylic acid (3-phenoxyphenyl)methyl ester]	1.0
79-46-9	2-Nitropropane	0.1	95-54-5	1,2-Phenylenediamine	1.0
924-16-3	N-Nitrosodi-n-butylamine	0.1	108-45-2	1,3-Phenylenediamine	1.0
55-18-5	N-Nitrosodiethylamine	0.1	106-50-3	p-Phenylenediamine	1.0
62-75-9	N-Nitrosodimethylamine	0.1	615-28-1	1,2-Phenylenediamine dihydrochloride	1.0
86-30-6	N-Nitrosodiphenylamine	1.0	624-18-0	1,4-Phenylenediamine dihydrochloride	1.0
156-10-5	p-Nitrosodiphenylamine	1.0	90-43-7	2-Phenylphenol	1.0
621-64-7	N-Nitrosodi-n-propylamine	0.1	57-41-0	Phenytoin	0.1
759-73-9	N-Nitroso-N-ethylurea	0.1	75-44-5	Phosgene	1.0
684-93-5	N-Nitroso-N-methylurea	0.1	7803-51-2	Phosphine	1.0
4549-40-0	N-Nitrosomethylvinylamine	0.1	7723-14-0	Phosphorus (yellow or white)	1.0
59-89-2	N-Nitrosomorpholine	0.1	85-44-9	Phthalic anhydride	1.0
16543-55-8	N-Nitrosomonicotine	0.1	1918-02-1	Picloram	1.0
100-75-4	N-Nitrosopiperidine	0.1	88-89-1	Picric acid	1.0
88-72-2	o-Nitrotoluene	0.1	51-03-6	Piperonyl butoxide	1.0
99-55-8	5-Nitro-o-toluidine	1.0	29232-93-7	Pirimiphos methyl [O-(2-(Diethylamino)-6-methyl-4-pyrimidinyl)-O,O-dimethylphosphorothioate]	1.0
27314-13-2	Norflurazon [4-Chloro-5-(methylamino)-2-[3-(trifluoromethyl)phenyl]-3(2H)-pyridazinone]	1.0	1336-36-3	Polychlorinated biphenyls (PCBs)	*
2234-13-1	Octachloronaphthalene	1.0	7758-01-2	Potassium bromate	0.1
29082-74-4	Octachlorostyrene	*	128-03-0	Potassium dimethyldithiocarbamate	1.0
19044-88-3	Oryzalin [4-(Dipropylamino)-3,5-dinitrobenzene sulfonamide]	1.0	137-41-7	Potassium N-methyldithiocarbamate	1.0
20816-12-0	Osmium tetroxide	1.0	41198-08-7	Profenofos [O-(4-Bromo-2-chlorophenyl)-O-ethyl-S-propyl phosphorothioate]	1.0
301-12-2	Oxydemeton methyl [S-(2-(Ethylsulfinyl)ethyl) O,O-dimethyl ester phosphorothioic acid]	1.0			
19666-30-9	Oxydiazon [3-[2,4-Dichloro-5-(1-methylethoxy)phenyl]- 5-(1,1-dimethylethyl)-1,3,4-oxadiazol-2(3H)-one]	1.0			
42874-03-3	Oxyfluorfen	1.0			
10028-15-6	Ozone	1.0			
123-63-7	Paraldehyde	1.0			
1910-42-5	Paraquat dichloride	1.0			

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CAS Number	Chemical Name	De minimus % Limit	CAS Number	Chemical Name	De minimus % Limit
7287-19-6	Prometryn	1.0	1982-69-0	Sodium dicamba [3,6-Dichloro-2-methoxybenzoic acid, sodium salt]	1.0
23950-58-5	Pronamide	1.0	128-04-1	Sodium dimethyldithiocarbamate	1.0
1918-16-7	Propachlor	1.0	62-74-8	Sodium fluoroacetate	1.0
1120-71-4	Propane sultone	0.1	7632-00-0	Sodium nitrite	1.0
709-98-8	[N-(3,4-Dichlorophenyl)propanamide]	1.0	131-52-2	Sodium pentachlorophenate	1.0
2312-35-8	Propargite	1.0	132-27-4	Sodium o-phenylphenoxide	0.1
107-19-7	Propargyl alcohol	1.0	100-42-5	Styrene	0.1
31218-83-4	Propetamphos	1.0	96-09-3	Styrene oxide	0.1
60207-90-1	Propiconazole	1.0	7664-93-9	Sulfuric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)	1.0
57-57-8	beta-Propiolactone	0.1	2699-79-8	Sulfuryl fluoride (Vikane)	1.0
123-38-6	Propionaldehyde	1.0	35400-43-2	Sulprofos	1.0
114-26-1	Propoxur	1.0		[O-Ethyl O-[4-(methylthio)phenyl]phosphorodithioic acid S-propylester]	
115-07-1	Propylene (Propene)	1.0	34014-18-1	Tebuthiuron	1.0
75-55-8	Propyleneimine	0.1		[N-[5-(1,1-Dimethylethyl)-1,3,4-thiadiazol-2-yl]-N,N'-dimethylurea]	
75-56-9	Propylene oxide	0.1	3383-96-8	Temephos	1.0
110-86-1	Pyridine	1.0	5902-51-2	Terbacil	1.0
91-22-5	Quinoline	1.0		[5-Chloro-3-(1,1-dimethylethyl)-6-methyl-2,4(1H,3H)-pyrimidinedione]	
106-51-4	Quinone	1.0	79-94-7	Tetrabromobisphenol A	*
82-68-8	Quintozene (Pentachloronitrobenzene)	1.0	630-20-6	1,1,1,2-Tetrachloroethane	1.0
76578-14-8	Quizalofop-ethyl	1.0	79-34-5	1,1,2,2-Tetrachloroethane	1.0
10453-86-8	Resmethrin	1.0	127-18-4	Tetrachloroethylene (Perchloroethylene)	0.1
81-07-2	Saccharin (only persons who manufacture are subject, no supplier notification)	1.0	354-11-0	1,1,1,2-Tetrachloro-2-fluoroethane (HCFC-121a)	1.0
94-59-7	Safrole	0.1	354-14-3	1,1,2,2-Tetrachloro-1-fluoroethane (HCFC-121)	1.0
7782-49-2	Selenium	1.0	961-11-5	Tetrachlorvinphos	1.0
74051-80-2	Sethoxydim	1.0		[Phosphoric acid, 2-chloro-1-(2,4,5-trichlorophenyl) ethenyl dimethyl ester]	
7440-22-4	Silver	1.0	64-75-5	Tetracycline hydrochloride	1.0
122-34-9	Simazine	1.0	116-14-3	Tetrafluoroethylene	0.1
26628-22-8	Sodium azide	1.0	509-14-8	Tetranitromethane	0.1
			7696-12-0	Tetramethrin	1.0
				[2,2-Dimethyl-3-(2-methyl-1-propenyl) cyclopropanecarboxylic acid (1,3,4,5,6,7-hexahydro-1,3-dioxo-2H-isoindol-2-yl)methyl ester]	
			7440-28-0	Thallium	1.0
			148-79-8	Thiabendazole	1.0
				[2-(4-Thiazolyl)-1H-benzimidazole]	
			62-55-5	Thioacetamide	0.1

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CAS Number	Chemical Name	De minimus % Limit
28249-77-6	Thiobencarb [Carbamic acid, diethylthio-, S-(p-chlorobenzyl)ester]	1.0
139-65-1	4,4'-Thiodianiline	0.1
59669-26-0	Thiodicarb	1.0
23564-06-9	Thiophanate ethyl [[1,2-Phenylenebis(iminocarbonothioyl) ] biscarbamic acid diethylester]	1.0
23564-05-8	Thiophanate methyl	1.0
79-19-6	Thiosemicarbazide	1.0
62-56-6	Thiourea	0.1
137-26-8	Thiram	1.0
1314-20-1	Thorium dioxide	1.0
7550-45-0	Titanium tetrachloride	1.0
108-88-3	Toluene	1.0
584-84-9	Toluene-2,4-diisocyanate	0.1
91-08-7	Toluene-2,6-diisocyanate	0.1
26471-62-5	Toluene diisocyanate (mixed isomers)	0.1
95-53-4	o-Toluidine	0.1
636-21-5	o-Toluidine hydrochloride	0.1
8001-35-2	Toxaphene	*
43121-43-3	Triadimefon [1-(4-Chlorophenoxy)-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl)-2-butanone]	1.0
2303-17-5	Triallate	1.0
68-76-8	Triaziquone [2,5-Cyclohexadiene-1,4-dione, 2,3,5-tris(1-aziridinyl)-]	1.0
101200-48-0	Tribenuron methyl [2-[[[(4-Methoxy-6-methyl-1,3,5-triazin-2-yl)-methylamino]-carbonyl]amino]sulfonyl] benzoic acid methyl ester)	1.0
1983-10-4	Tributyltin fluoride	1.0
2155-70-6	Tributyltin methacrylate	1.0
78-48-8	S,S,S-Tributyltrithio- phosphate (DEF)	1.0
52-68-6	Trichlorfon [Phosphoric acid,(2,2,2-trichloro-1-hydroxy-ethyl)-, dimethyl ester]	1.0
76-02-8	Trichloroacetyl chloride	1.0
120-82-1	1,2,4-Trichlorobenzene	1.0
71-55-6	1,1,1-Trichloroethane (Methyl chloroform)	1.0
79-00-5	1,1,2-Trichloroethane	1.0
79-01-6	Trichloroethylene	0.1
75-69-4	Trichlorofluoromethane (CFC-11)	1.0
95-95-4	2,4,5-Trichlorophenol	1.0
88-06-2	2,4,6-Trichlorophenol	0.1
96-18-4	1,2,3-Trichloropropane	0.1
57213-69-1	Triclopyr triethylammonium salt	1.0
121-44-8	Triethylamine	1.0
1582-09-8	Trifluralin [Benzeneamine, 2,6-dinitro-N,N-dipropyl-4-(trifluoromethyl)-]	*

CAS Number	Chemical Name	De minimus % Limit
26644-46-2	Triforine [N,N'-[1,4-Piperazinediylbis-(2,2,2-trichloroethylidene)]bisformamide ]	1.0
95-63-6	1,2,4-Trimethylbenzene	1.0
2655-15-4	2,3,5-Trimethylphenyl methylcarbamate	1.0
639-58-7	Triphenyltin chloride	1.0
76-87-9	Triphenyltin hydroxide	1.0
126-72-7	Tris(2,3-dibromopropyl) phosphate	0.1
72-57-1	Trypan blue	0.1
51-79-6	Urethane (Ethyl carbamate)	0.1
7440-62-2	Vanadium (except when contained in an alloy)	1.0
50471-44-8	Vinclozolin [3-(3,5-Dichlorophenyl)-5-ethenyl-5-methyl-2,4-oxazolidinedione]	1.0
108-05-4	Vinyl acetate	0.1
593-60-2	Vinyl bromide	0.1
75-01-4	Vinyl chloride	0.1
75-02-5	Vinyl fluoride	0.1
75-35-4	Vinylidene chloride	1.0
108-38-3	m-Xylene	1.0
95-47-6	o-Xylene	1.0
106-42-3	p-Xylene	1.0
1330-20-7	Xylene (mixed isomers)	1.0
87-62-7	2,6-Xylidine	0.1
7440-66-6	Zinc (fume or dust)	1.0
12122-67-7	Zineb [Carbamodithioic acid, 1,2-ethanediyibis-, zinc complex]	1.0

b. Individually Listed Toxic Chemicals Arranged by CAS Number

CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>		
50-00-0	Formaldehyde	0.1
51-03-6	Piperonyl butoxide	1.0
51-21-8	Fluorouracil (5-Fluorouracil)	1.0
51-28-5	2,4-Dinitrophenol	1.0
51-75-2	Nitrogen mustard [2-Chloro-N-(2-chloroethyl)-N-methylethanamine]	0.1
51-79-6	Urethane (Ethyl carbamate)	0.1
52-68-6	Trichlorfon [Phosphonic acid, (2,2,2-trichloro-1-hydroxyethyl)-, dimethyl ester]	1.0
52-85-7	Famphur	1.0
53-96-3	2-Acetylaminofluorene	0.1
55-18-5	N-Nitrosodiethylamine	0.1
55-21-0	Benzamide	1.0

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CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>		
55-38-9	Fenthion [O,O-Dimethyl O-[3-methyl-4-(methylthio)phenyl] ester, phosphorothioic acid]	1.0
55-63-0	Nitroglycerin	1.0
56-23-5	Carbon tetrachloride	0.1
56-35-9	Bis(tributyltin) oxide	1.0
56-38-2	Parathion [Phosphorothioic acid, O,O-diethyl-O-(4-nitrophenyl) ester]	1.0
57-14-7	1,1-Dimethylhydrazine	0.1
57-33-0	Pentobarbital sodium	1.0
57-41-0	Phenytoin	0.1
57-57-8	beta-Propiolactone	0.1
57-74-9	Chlordane [4,7-Methanoindan, 1,2,4,5,6,7,8,8-octachloro-2,3,3a,4,7,7a-hexahydro-]	*
58-89-9	[Cyclohexane, 1,2,3,4,5,6-hexachloro-, (1.alpha.,2.alpha.,3.beta.,4.alpha.,5.alpha.,6.beta.)-]	0.1
59-89-2	N-Nitrosomorpholine	0.1
60-09-3	4-Aminoazobenzene	0.1
60-11-7	4-Dimethylaminoazobenzene	0.1
60-34-4	Methyl hydrazine	1.0
60-35-5	Acetamide	0.1
60-51-5	Dimethoate	1.0
61-82-5	Amitrole	0.1
62-53-3	Aniline	1.0
62-55-5	Thioacetamide	0.1
62-56-6	Thiourea	0.1
62-73-7	Dichlorvos [Phosphoric acid, 2,2-dichloroethenyl dimethyl ester]	0.1
62-74-8	Sodium fluoroacetate	1.0
62-75-9	N-Nitrosodimethylamine	0.1
63-25-2	Carbaryl [1-Naphthalenol, methylcarbamate]	1.0
64-18-6	Formic acid	1.0
64-67-5	Diethyl sulfate	0.1
64-75-5	Tetracycline hydrochloride	1.0
67-56-1	Methanol	1.0
67-63-0	Isopropyl alcohol (only persons who manufacture by the strong acid process are subject, no supplier notification)	1.0
67-66-3	Chloroform	0.1
67-72-1	Hexachloroethane	0.1
68-12-2	N,N-Dimethylformamide	1.0
68-76-8	Triaziquone [2,5-Cyclohexadiene-1,4-dione, 2,3,5-tris(1-aziridinyl)-]	1.0
70-30-4	Hexachlorophene	1.0
71-36-3	n-Butyl alcohol	1.0
71-43-2	Benzene	0.1

CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>		
71-55-6	1,1,1-Trichloroethane (Methyl chloroform)	1.0
72-43-5	Methoxychlor [Benzene, 1,1'-(2,2,2-trichloroethylidene)bis[4-methoxy-]]	*
72-57-1	Trypan blue	0.1
74-83-9	Bromomethane (Methyl bromide)	1.0
74-85-1	Ethylene	1.0
74-87-3	Chloromethane (Methyl chloride)	1.0
74-88-4	Methyl iodide	1.0
74-90-8	Hydrogen cyanide	1.0
74-95-3	Methylene bromide	1.0
75-00-3	Chloroethane (Ethyl chloride)	1.0
75-01-4	Vinyl chloride	0.1
75-02-5	Vinyl fluoride	0.1
75-05-8	Acetonitrile	1.0
75-07-0	Acetaldehyde	0.1
75-09-2	Dichloromethane (Methylene chloride)	0.1
75-15-0	Carbon disulfide	1.0
75-21-8	Ethylene oxide	0.1
75-25-2	Bromoform (Tribromomethane)	1.0
75-27-4	Dichlorobromomethane	0.1
75-34-3	Ethylidene dichloride	1.0
75-35-4	Vinylidene chloride	1.0
75-43-4	Dichlorofluoromethane (HCFC-21)	1.0
75-44-5	Phosgene	1.0
75-45-6	Chlorodifluoromethane (HCFC-22)	1.0
75-52-5	Nitromethane	0.1
75-55-8	Propyleneimine	0.1
75-56-9	Propylene oxide	0.1
75-63-8	Bromotrifluoromethane (Halon 1301)	1.0
75-65-0	tert-Butyl alcohol	1.0
75-68-3	1-Chloro-1,1-difluoroethane (HCFC-142b)	1.0
75-69-4	Trichlorofluoromethane (CFC-11)	1.0
75-71-8	Dichlorodifluoromethane (CFC-12)	1.0
75-72-9	Chlorotrifluoromethane (CFC-13)	1.0
75-86-5	2-Methylacetonitrile	1.0
75-88-7	2-Chloro-1,1,1-trifluoroethane (HCFC-133a)	1.0
76-01-7	Pentachloroethane	1.0
76-02-8	Trichloroacetyl chloride	1.0
76-06-2	Chloropicrin	1.0
76-13-1	Freon 113 [Ethane, 1,1,2-trichloro-1,2,2-trifluoro-]	1.0
76-14-2	Dichlorotetrafluoroethane (CFC-114)	1.0
76-15-3	Monochloropentafluoroethane (CFC-115)	1.0

**Table II. EPCRA Section 313 Chemical List for Reporting Year 2014**

CAS Number	Chemical Name	De minimus % Limit	CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>			<i>Arranged by CAS Number</i>		
76-44-8	Heptachlor	*	91-22-5	Quinoline	1.0
	[1,4,5,6,7,8,8-Heptachloro-3a,4,7,7a-tetrahydro-4,7-methano-1H-indene]		91-23-6	o-Nitroanisole	0.1
76-87-9	Triphenyltin hydroxide	1.0	91-59-8	beta-Naphthylamine	0.1
77-09-8	Phenolphthalein	0.1	91-94-1	3,3'-Dichlorobenzidine	0.1
77-47-4	Hexachlorocyclopentadiene	1.0	92-52-4	Biphenyl	1.0
77-73-6	Dicyclopentadiene	1.0	92-67-1	4-Aminobiphenyl	0.1
77-78-1	Dimethyl sulfate	0.1	92-87-5	Benzidine	0.1
78-48-8	S,S,S-Tributyltrithiophosphate (DEF)	1.0	92-93-3	4-Nitrobiphenyl	0.1
78-79-5	Isoprene	0.1	93-15-2	Methyleugenol	0.1
78-84-2	Isobutyraldehyde	1.0	93-65-2	Mecoprop	0.1
78-87-5	1,2-Dichloropropane	1.0	94-11-1	2,4-D isopropyl ester	0.1
78-88-6	2,3-Dichloropropene	1.0	94-36-0	Benzoyl peroxide	1.0
78-92-2	sec-Butyl alcohol	1.0	94-58-6	Dihydrosafrole	0.1
79-00-5	1,1,2-Trichloroethane	1.0	94-59-7	Safrole	0.1
79-01-6	Trichloroethylene	0.1	94-74-6	Methoxone	0.1
79-06-1	Acrylamide	0.1		((4-Chloro-2-methylphenoxy) acetic acid) (MCPA)	
79-10-7	Acrylic acid	1.0	94-75-7	2,4-D [Acetic acid, (2,4-dichlorophenoxy)-]	0.1
79-11-8	Chloroacetic acid	1.0	94-80-4	2,4-D butyl ester	0.1
79-19-6	Thiosemicarbazide	1.0	94-82-6	2,4-DB	1.0
79-21-0	Peracetic acid	1.0	95-47-6	o-Xylene	1.0
79-22-1	Methyl chlorocarbonate	1.0	95-48-7	o-Cresol	1.0
79-34-5	1,1,2,2-Tetrachloroethane	1.0	95-50-1	1,2-Dichlorobenzene	1.0
79-44-7	Dimethylcarbamyl chloride	0.1	95-53-4	o-Toluidine	0.1
79-46-9	2-Nitropropane	0.1	95-54-5	1,2-Phenylenediamine	1.0
79 94 7	Tetrabromobisphenol A	*	95-63-6	1,2,4-Trimethylbenzene	1.0
80-05-7	4,4'-Isopropylidenediphenol	1.0	95-69-2	p-Chloro-o-toluidine	0.1
80-15-9	Cumene hydroperoxide	1.0	95-80-7	2,4-Diaminotoluene	0.1
80-62-6	Methyl methacrylate	1.0	95-95-4	2,4,5-Trichlorophenol	1.0
81-07-2	Saccharin (only persons who manufacture are subject, no supplier notification)	1.0	96-09-3	Styrene oxide	0.1
81-49-2	1-Amino-2,4-dibromoanthraquinone	0.1	96-12-8	1,2-Dibromo-3-chloropropane (DBCP)	0.1
81-88-9	C.I. Food Red 15	1.0	96-18-4	1,2,3-Trichloropropane	0.1
82-28-0	1-Amino-2-methylanthraquinone	0.1	96-33-3	Methyl acrylate	1.0
82-68-8	Quintozene [Pentachloronitrobenzene]	1.0	96-45-7	Ethylene thiourea	0.1
84-74-2	Dibutyl phthalate	1.0	97-23-4	Dichlorophene [2,2'-Methylenebis(4-chlorophenol)]	1.0
85-01-8	Phenanthrene	1.0	97-56-3	C.I. Solvent Yellow 3	0.1
85-44-9	Phthalic anhydride	1.0	98-07-7	Benzoic trichloride (Benzotrichloride)	0.1
86-30-6	N-Nitrosodiphenylamine	1.0	98-82-8	Cumene	1.0
87-62-7	2,6-Xylidine	0.1	98-86-2	Acetophenone	1.0
87-68-3	Hexachloro-1,3-butadiene	1.0	98-87-3	Benzal chloride	1.0
87-86-5	Pentachlorophenol (PCP)	0.1	98-88-4	Benzoyl chloride	1.0
88-06-2	2,4,6-Trichlorophenol	0.1	98-95-3	Nitrobenzene	0.1
88-72-2	o-Nitrotoluene	0.1	99-30-9	Dichloran [2,6-Dichloro-4-nitroaniline]	1.0
88-75-5	2-Nitrophenol	1.0	99-55-8	5-Nitro-o-toluidine	1.0
88-85-7	Dinitrobutyl phenol (Dinoseb)	1.0	99-59-2	5-Nitro-o-anisidine	1.0
88-89-1	Picric acid	1.0	99-65-0	m-Dinitrobenzene	1.0
90-04-0	o-Anisidine	0.1	100-01-6	p-Nitroaniline	1.0
90-43-7	2-Phenylphenol	1.0	100-02-7	4-Nitrophenol	1.0
90-94-8	Michler's ketone	0.1	100-25-4	p-Dinitrobenzene	1.0
91-08-7	Toluene-2,6-diisocyanate	0.1	100-41-4	Ethylbenzene	0.1
91-20-3	Naphthalene	0.1	100-42-5	Styrene	0.1

**Table II. EPCRA Section 313 Chemical List for Reporting Year 2014**

CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>		
100-44-7	Benzyl chloride	1.0
100-75-4	N-Nitrosopiperidine	0.1
101-05-3	Anilazine	1.0
101-14-4	[4,6-Dichloro-N-(2-chlorophenyl)-1,3,5-triazin-2-amine]	0.1
101-61-1	4,4'-Methylenebis(2-chloroaniline) (MBOCA)	0.1
101-61-1	4,4'-Methylenebis(N,N-dimethyl)benzenamine	0.1
101-77-9	4,4'-Methylenedianiline	0.1
101-80-4	4,4'-Diaminodiphenyl ether	0.1
101-90-6	Diglycidyl resorcinol ether	0.1
104-12-1	p-Chlorophenyl isocyanate	1.0
104-94-9	p-Anisidine	1.0
105-67-9	2,4-Dimethylphenol	1.0
106-42-3	p-Xylene	1.0
106-44-5	p-Cresol	1.0
106-46-7	1,4-Dichlorobenzene	0.1
106-47-8	p-Chloroaniline	0.1
106-50-3	p-Phenylenediamine	1.0
106-51-4	Quinone	1.0
106-88-7	1,2-Butylene oxide	0.1
106-89-8	Epichlorohydrin	0.1
106-93-4	1,2-Dibromoethane (Ethylene dibromide)	0.1
106-99-0	1,3-Butadiene	0.1
107-02-8	Acrolein	1.0
107-05-1	Allyl chloride	1.0
107-06-2	1,2-Dichloroethane (Ethylene dichloride)	0.1
107-11-9	Allylamine	1.0
107-13-1	Acrylonitrile	0.1
107-18-6	Allyl alcohol	1.0
107-19-7	Propargyl alcohol	1.0
107-21-1	Ethylene glycol	1.0
107-30-2	Chloromethyl methyl ether	0.1
108-05-4	Vinyl acetate	0.1
108-10-1	Methyl isobutyl ketone	1.0
108-31-6	Maleic anhydride	1.0
108-38-3	m-Xylene	1.0
108-39-4	m-Cresol	1.0
108-45-2	1,3-Phenylenediamine	1.0
108-60-1	Bis(2-chloro-1-methylethyl) ether	1.0
108-88-3	Toluene	1.0
108-90-7	Chlorobenzene	1.0
108-93-0	Cyclohexanol	1.0
108-95-2	Phenol	1.0
109-06-8	2-Methylpyridine	1.0
109-77-3	Malononitrile	1.0
109-86-4	2-Methoxyethanol	1.0
110-00-9	Furan	0.1
110-54-3	n-Hexane	1.0
110-57-6	trans-1,4-Dichloro-2-butene	1.0
110-80-5	2-Ethoxyethanol	1.0
110-82-7	Cyclohexane	1.0
110-86-1	Pyridine	1.0
111-42-2	Diethanolamine	1.0

CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>		
111-44-4	Bis(2-chloroethyl) ether	1.0
111-91-1	Bis(2-chloroethoxy) methane	1.0
114-26-1	Propoxur [Phenol, 2-(1-methylethoxy)-, methylcarbamate]	1.0
115-07-1	Propylene (Propene)	1.0
115-28-6	Chlorendic acid	0.1
115-32-2	Dicofol [Benzenemethanol, 4-chloro-.alpha.-4-(chlorophenyl)-.alpha.-(trichloromethyl)-]	1.0
116-06-3	Aldicarb	1.0
116-14-3	Tetrafluoroethylene	0.1
117-79-3	2-Aminoanthraquinone	0.1
117-81-7	Di(2-ethylhexyl) phthalate	0.1
118-74-1	Hexachlorobenzene	*
119-90-4	3,3'-Dimethoxybenzidine	0.1
119-93-7	3,3'-Dimethylbenzidine(o-Tolidine)	0.1
120-12-7	Anthracene	1.0
120-36-5	2,4-DP	0.1
120-58-1	Isosafrole	1.0
120-71-8	p-Cresidine	0.1
120-80-9	Catechol	0.1
120-82-1	1,2,4-Trichlorobenzene	1.0
120-83-2	2,4-Dichlorophenol	1.0
121-14-2	2,4-Dinitrotoluene	0.1
121-44-8	Triethylamine	1.0
121-69-7	N,N-Dimethylaniline	1.0
121-75-5	Malathion	1.0
122-34-9	Simazine	1.0
122-39-4	Diphenylamine	1.0
122-66-7	1,2-Diphenylhydrazine (Hydrazobenzene)	0.1
123-31-9	Hydroquinone	1.0
123-38-6	Propionaldehyde	1.0
123-63-7	Paraldehyde	1.0
123-72-8	Butyraldehyde	1.0
123-91-1	1,4-Dioxane	0.1
124-40-3	Dimethylamine	1.0
124-73-2	Dibromotetrafluoroethane (Halon 2402)	1.0
126-72-7	Tris(2,3-dibromopropyl) phosphate	0.1
126-98-7	Methacrylonitrile	1.0
126-99-8	Chloroprene	0.1
127-18-4	Tetrachloroethylene (Perchloroethylene)	0.1
128-03-0	Potassium dimethyldithiocarbamate	1.0
128-04-1	Sodium dimethyldithiocarbamate	1.0
128-66-5	C.I. Vat Yellow 4	1.0
131-11-3	Dimethyl phthalate	1.0
131-52-2	Sodium pentachlorophenate	1.0
132-27-4	Sodium o-phenylphenoxide	0.1
132-64-9	Dibenzofuran	1.0

**Table II. EPCRA Section 313 Chemical List for Reporting Year 2014**

CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>		
133-06-2	Captan [1H-Isoindole-1,3(2H)-dione, 3a,4,7,7a-tetrahydro-2- [(trichloromethyl)thio]-]	1.0
133-07-3	Folpet	1.0
133-90-4	Chloramben [Benzoic acid, 3-amino-2,5- dichloro-]	1.0
134-29-2	o-Anisidine hydrochloride	0.1
134-32-7	alpha-Naphthylamine	0.1
135-20-6	Cupferron [Benzeneamine, N-hydroxy-N- nitroso, ammonium salt]	0.1
136-45-8	Dipropyl isocinchomeronate	1.0
137-26-8	Thiram	1.0
137-41-7	Potassium N-methyldithio- carbamate	1.0
137-42-8	Metham sodium (Sodium methyldithiocarbamate)	1.0
138-93-2	Disodium cyanodithioimido- carbonate	1.0
139-13-9	Nitrilotriacetic acid	0.1
139-65-1	4,4'-Thiodianiline	0.1
140-88-5	Ethyl acrylate	0.1
141-32-2	Butyl acrylate	1.0
142-59-6	Nabam	1.0
148-79-8	Thiabendazole [2-(4-Thiazolyl)-1H- benzimidazole]	1.0
149-30-4	2-Mercaptobenzothiazole (MBT)	1.0
150-50-5	Merphos	1.0
150-68-5	Monuron	1.0
151-56-4	Ethyleneimine (Aziridine)	0.1
156-10-5	p-Nitrosodiphenylamine	1.0
156-62-7	Calcium cyanamide	1.0
191-24-2	Benzo(g,h,i)perylene	*
298-00-0	Methyl parathion	1.0
300-76-5	Naled	1.0
301-12-2	Oxydemeton methyl [S-(2-(Ethylsulfinyl)ethyl) O,O- dimethyl ester phosphorothioic acid]	1.0
302-01-2	Hydrazine	0.1
306-83-2	2,2-Dichloro-1,1,1-trifluoroethane (HCFC-123)	1.0
309-00-2	Aldrin [1,4:5,8-Dimethanonaphthalene, 1,2,3,4,10,10-hexachloro- 1,4,4a,5,8,8a-hexahydro- (1.alpha.,4.alpha.,4a.beta., 5.alpha.,8.alpha.,8a.beta.)-]	*
314-40-9	(5-Bromo-6-methyl-3-(1- methylpropyl)-2,4(1H,3H)- pyrimidinedione)	1.0
319-84-6	alpha-Hexachlorocyclohexane	0.1
330-54-1	Diuron	1.0

CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>		
330-55-2	Linuron	1.0
333-41-5	Diazinon	1.0
334-88-3	Diazomethane	1.0
353-59-3	Bromochlorodifluoromethane (Halon 1211)	1.0
354-11-0	1,1,1,2-Tetrachloro-2-fluoroethane (HCFC-121a)	1.0
354-14-3	1,1,2,2-Tetrachloro-1-fluoroethane (HCFC-121)	1.0
354-23-4	1,2-Dichloro-1,1,2-trifluoroethane (HCFC-123a)	1.0
354-25-6	1-Chloro-1,1,2,2-tetrafluoroethane (HCFC-124a)	1.0
357-57-3	Brucine	1.0
422-44-6	1,2-Dichloro-1,1,2,3,3- pentafluoropropane (HCFC- 225bb)	1.0
422-48-0	2,3-Dichloro-1,1,1,2,3- pentafluoropropane (HCFC- 225ba)	1.0
422-56-0	3,3-Dichloro-1,1,1,2,2- pentafluoropropane (HCFC- 225ca)	1.0
431-86-7	1,2-Dichloro-1,1,3,3,3- pentafluoropropane (HCFC- 225da)	1.0
460-35-5	3-Chloro-1,1,1-trifluoropropane (HCFC-253fb)	1.0
463-58-1	Carbonyl sulfide	1.0
465-73-6	Isodrin	*
492-80-8	C.I. Solvent Yellow 34 (Auramine)	0.1
505-60-2	Mustard gas [Ethane, 1,1'-thiobis[2-chloro-]]	0.1
507-55-1	1,3-Dichloro-1,1,2,2,3- pentafluoropropane (HCFC- 225cb)	1.0
509-14-8	Tetranitromethane	0.1
510-15-6	[Benzeneacetic acid, 4-chloro- .alpha.-(4-chlorophenyl)-.alpha.- hydroxy-, ethyl ester]	1.0
528-29-0	o-Dinitrobenzene	1.0
532-27-4	2-Chloroacetophenone	1.0
533-74-4	Dazomet (Tetrahydro-3,5-dimethyl-2H- 1,3,5-thiadiazine-2-thione)	1.0
534-52-1	4,6-Dinitro-o-cresol	1.0
540-59-0	1,2-Dichloroethylene	1.0
541-41-3	Ethyl chloroformate	1.0
541-53-7	2,4-Dithiobiuret	1.0
541-73-1	1,3-Dichlorobenzene	1.0
542-75-6	1,3-Dichloropropylene	0.1
542-76-7	3-Chloropropionitrile	1.0
542-88-1	Bis(chloromethyl) ether	0.1
554-13-2	Lithium carbonate	1.0
556-52-5	Glycidol	0.1



Table II. EPCRA Section 313 Chemical List for Reporting Year 2014

CAS Number	Chemical Name	De minimus % Limit	CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>			<i>Arranged by CAS Number</i>		
556-61-6	Methyl isothiocyanate [Isothiocyanatomethane]	1.0	1319-77-3	Cresol (mixed isomers)	1.0
563-47-3	3-Chloro-2-methyl-1-propene	0.1	1320-18-9	2,4-D propylene glycol butyl ether ester	0.1
569-64-2	C.I. Basic Green 4	1.0	1330-20-7	Xylene (mixed isomers)	1.0
584-84-9	Toluene-2,4-diisocyanate	0.1	1332-21-4	Asbestos (friable)	0.1
593-60-2	Vinyl bromide	0.1	1335-87-1	Hexachloronaphthalene	1.0
594-42-3	Perchloromethyl mercaptan	1.0	1336-36-3	Polychlorinated biphenyls (PCBs)	*
606-20-2	2,6-Dinitrotoluene	0.1	1344-28-1	Aluminum oxide (fibrous forms)	1.0
608 93 5	Pentachlorobenzene	*	1464-53-5	Diepoxybutane	0.1
612-82-8	3,3'-Dimethylbenzidine dihydrochloride (o-Tolidine dihydrochloride)	0.1	1563-66-2	Carbofuran	1.0
612-83-9	3,3'-Dichlorobenzidine dihydrochloride	0.1	1582-09-8	Trifluralin [Benzeneamine, 2,6-dinitro-N,N-dipropyl-4-(trifluoromethyl)-]	*
615-05-4	2,4-Diaminoanisole	0.1	1634-04-4	Methyl tert-butyl ether	1.0
615-28-1	1,2-Phenylenediamine dihydrochloride	1.0	1649-08-7	1,2-Dichloro-1,1-difluoroethane (HCFC-132b)	1.0
621-64-7	N-Nitrosodi-n-propylamine	0.1	1689-84-5	Bromoxynil (3,5-Dibromo-4-hydroxybenzonitrile)	1.0
624-18-0	1,4-Phenylenediamine dihydrochloride	1.0	1689-99-2	Bromoxynil octanoate (Octanoic acid, 2,6-dibromo-4-cyanophenyl ester)	1.0
624-83-9	Methyl isocyanate	1.0	1717-00-6	1,1-Dichloro-1-fluoroethane (HCFC-141b)	1.0
630-20-6	1,1,1,2-Tetrachloroethane	1.0	1836-75-5	Nitrofen [Benzene, 2,4-dichloro-1-(4-nitrophenoxy)-]	0.1
636-21-5	o-Toluidine hydrochloride	0.1	1861-40-1	Benfluralin (N-Butyl-N-ethyl-2,6-dinitro-4-(trifluoromethyl)benzenamine)	1.0
639-58-7	Triphenyltin chloride	1.0	1897-45-6	Chlorothalonil [1,3-Benzenedicarbonitrile, 2,4,5,6-tetrachloro-]	0.1
680-31-9	Hexamethylphosphoramide	0.1	1910-42-5	Paraquat dichloride	1.0
684-93-5	N-Nitroso-N-methylurea	0.1	1912-24-9	Atrazine (6-Chloro-N-ethyl-N'-(1-methylethyl)-1,3,5-triazine-2,4-diamine)	1.0
709-98-8	Propanil (N-(3,4-Dichlorophenyl) propanamide)	1.0	1918-00-9	Dicamba (3,6-Dichloro-2-methoxybenzoic acid)	1.0
759-73-9	N-Nitroso-N-ethylurea	0.1	1918-02-1	Picloram	1.0
759-94-4	Ethyl dipropylthiocarbamate (EPTC)	1.0	1918-16-7	Propachlor [2-Chloro-N-(1-methylethyl)-N-phenylacetamide]	1.0
764-41-0	1,4-Dichloro-2-butene	1.0	1928-43-4	2,4-D 2-ethylhexyl ester	0.1
812-04-4	1,1-Dichloro-1,2,2-trifluoroethane (HCFC-123b)	1.0	1929-73-3	2,4-D butoxyethyl ester	0.1
834-12-8	Ametryn (N-Ethyl-N'-(1-methylethyl)-6-(methylthio)-1,3,5,-triazine-2,4-diamine)	1.0	1929-82-4	Nitrapyrin (2-Chloro-6-(trichloromethyl)pyridine)	1.0
842-07-9	C.I. Solvent Yellow 14	1.0	1937-37-7	C.I. Direct Black 38	0.1
872-50-4	N-Methyl-2-pyrrolidone	1.0	1982-69-0	Sodium dicamba [3,6-Dichloro-2-methoxybenzoic acid, sodium salt]	1.0
924-16-3	N-Nitrosodi-n-butylamine	0.1	1983-10-4	Tributyltin fluoride	1.0
924-42-5	N-Methylolacrylamide	1.0	2032-65-7	Methiocarb	1.0
957-51-7	Diphenamid	1.0	2155-70-6	Tributyltin methacrylate	1.0
961-11-5	Tetrachlorvinphos [Phosphoric acid, 2-chloro-1-(2,4,5-trichlorophenyl)ethenyldimethyl ester]	1.0			
989-38-8	C.I. Basic Red 1	1.0			
1114-71-2	Pebulate [Butylethylcarbamothioic acid S-propyl ester]	1.0			
1120-71-4	Propane sultone	0.1			
1134-23-2	Cycloate	1.0			
1163-19-5	Decabromodiphenyl oxide	1.0			
1313-27-5	Molybdenum trioxide	1.0			
1314-20-1	Thorium dioxide	1.0			

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CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>		
2164-07-0	Dipotassium endothall [7-Oxabicyclo(2.2.1)heptane-2,3-dicarboxylic acid, dipotassium salt]	1.0
2164-17-2	Fluometuron [Urea, N,N-dimethyl-N'-[3-(trifluoromethyl)phenyl]-]	1.0
2212-67-1	Molinate (1H-Azepine-1-carbothioic acid, hexahydro-S-ethyl ester)	1.0
2234-13-1	Octachloronaphthalene	1.0
2300-66-5	Dimethylamine dicamba	1.0
2303-16-4	Diallate [Carbamothioic acid, bis(1-methylethyl)-S-(2,3-dichloro-2-propenyl) ester]	1.0
2303-17-5	Triallate	1.0
2312-35-8	Propargite	1.0
2439-01-2	Chinomethionat [6-Methyl-1,3-dithiolo[4,5-b]quinoxalin-2-one]	1.0
2439-10-3	Dodine [Dodecylguanidine monoacetate]	1.0
2524-03-0	Dimethyl chlorothiophosphate	1.0
2602-46-2	C.I. Direct Blue 6	0.1
2655-15-4	2,3,5-Trimethylphenyl methyl carbamate	1.0
2699-79-8	Sulfuryl fluoride (Vikane)	1.0
2702-72-9	2,4-D sodium salt	0.1
2832-40-8	C.I. Disperse Yellow 3	1.0
2837-89-0	2-Chloro-1,1,1,2-tetrafluoroethane (HCFC-124)	1.0
2971-38-2	2,4-D Chlorocrotyl ester	0.1
3118-97-6	C.I. Solvent Orange 7	1.0
3296-90-0	2,2-bis(Bromomethyl)-1,3-propanediol	0.1
3383-96-8	Temephos	1.0
3653-48-3	Methoxone sodium salt (4-Chloro-2-methylphenoxy) acetate sodium salt)	0.1
3761-53-3	C.I. Food Red 5	0.1
4080-31-3	1-(3-Chloroallyl)-3,5,7-triaza-1-azoniaadamantane chloride	1.0
4170-30-3	Crotonaldehyde	1.0
4549-40-0	N-Nitrosomethylvinylamine	0.1
4680-78-8	C.I. Acid Green 3	1.0
5234-68-4	Carboxin (5,6-Dihydro-2-methyl-N-phenyl-1,4-oxathiin-3-carboxamide)	1.0
5598-13-0	Chlorpyrifos methyl [O,O-Dimethyl-O-(3,5,6-trichloro-2-pyridyl)phosphorothioate]	1.0
5902-51-2	[5-Chloro-3-(1,1-dimethylethyl)-6-methyl-2,4(1H,3H)-pyrimidinedione]	1.0
6459-94-5	C.I. Acid Red 114	0.1

CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>		
7287-19-6	Prometryn [N,N'-Bis(1-methylethyl)-6-methylthio-1,3,5-triazine-2,4-diamine]	1.0
7429-90-5	Aluminum (fume or dust)	1.0
7439-92-1	Lead (when lead is contained in stainless steel, brass or bronze alloys the de minimis level is 0.1)	*
7439-96-5	Manganese	1.0
7439-97-6	Mercury	*
7440-02-0	Nickel	0.1
7440-22-4	Silver	1.0
7440-28-0	Thallium	1.0
7440-36-0	Antimony	1.0
7440-38-2	Arsenic	0.1
7440-39-3	Barium	1.0
7440-41-7	Beryllium	0.1
7440-43-9	Cadmium	0.1
7440-47-3	Chromium	1.0
7440-48-4	Cobalt	0.1
7440-50-8	Copper	1.0
7440-62-2	Vanadium (except when contained in an alloy)	1.0
7440-66-6	Zinc (fume or dust)	1.0
7550-45-0	Titanium tetrachloride	1.0
7632-00-0	Sodium nitrite	1.0
7637-07-2	Boron trifluoride	1.0
7647-01-0	Hydrochloric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)	1.0
7664-39-3	Hydrogen fluoride	1.0
7664-41-7	Ammonia (includes anhydrous ammonia and aqueous ammonia from water dissociable ammonium salts and other sources; 10 percent of total aqueous ammonia is reportable under this listing)	1.0
7664-93-9	Sulfuric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)	1.0
7696-12-0	Tetramethrin [2,2-Dimethyl-3-(2-methyl-1-propenyl)cyclopropanecarboxylic acid (1,3,4,5,6,7-hexahydro-1,3-dioxo-2H-isoindol-2-yl)methyl ester]	1.0
7697-37-2	Nitric acid	1.0
7723-14-0	Phosphorus (yellow or white)	1.0
7726-95-6	Bromine	1.0
7758-01-2	Potassium bromate	0.1
7782-41-4	Fluorine	1.0

Table II. EPCRA Section 313 Chemical List for Reporting Year 2014

CAS Number	Chemical Name	De minimus % Limit	CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>			<i>Arranged by CAS Number</i>		
7782-49-2	Selenium	1.0	20816-12-0	Osmium tetroxide	1.0
7782-50-5	Chlorine	1.0	20859-73-8	Aluminum phosphide	1.0
7783-06-4	Hydrogen sulfide	1.0	21087-64-9	Metribuzin	1.0
7786-34-7	Mevinphos	1.0	21725-46-2	Cyanazine	1.0
7803-51-2	Phosphine	1.0	22781-23-3	[2,2-Dimethyl-1,3-benzodioxol-4-ol methylcarbamate]	1.0
8001-35-2	Toxaphene	*	23564-05-8	Thiophanate methyl	1.0
8001-58-9	Creosote	0.1	23564-06-9	Thiophanate ethyl	1.0
9006-42-2	Metiram	1.0		[[1,2-Phenylenebis(iminocarbonothioyl) biscarbamic acid diethyl ester]	
10028-15-6	Ozone	1.0	23950-58-5	Pronamide	1.0
10034-93-2	Hydrazine sulfate	0.1	25311-71-1	Isofenphos	1.0
10049-04-4	Chlorine dioxide	1.0		[2-[[Ethoxyl[(1-methylethyl)-amino]phosphinothioyl]oxy]benzoic acid 1-methylethyl ester]	
10061-02-6	trans-1,3-Dichloropropene	0.1	25321-14-6	Dinitrotoluene (mixed isomers)	1.0
10294-34-5	Boron trichloride	1.0	25321-22-6	Dichlorobenzene (mixed isomers)	0.1
10453-86-8	Resmethrin	1.0	25376-45-8	Diaminotoluene (mixed isomers)	0.1
	[[5-(Phenylmethyl)-3-furanyl]methyl-2,2-dimethyl-3-(2-methyl-1-propenyl) cyclopropanecarboxylate]]		26002-80-2	Phenothrin	1.0
12122-67-7	Zineb	1.0		[2,2-Dimethyl-3-(2-methyl-1-propenyl)cyclopropanecarboxylic acid (3-phenoxyphenyl)methyl ester]	
	[Carbamodithioic acid, 1,2-ethanediybis-, zinc complex]		26471-62-5	Toluene diisocyanate (mixed isomers)	0.1
12427-38-2	Maneb	1.0	26628-22-8	Sodium azide	1.0
	[Carbamodithioic acid, 1,2-ethanediybis-, manganese complex]		26644-46-2	Triforine	1.0
13194-48-4	Ethoprop	1.0		[N,N'-[1,4-Piperazinediybis(2,2,2-trichloroethylidene)]bisformamide]	
	[Phosphorodithioic acid O-ethyl S,S-dipropyl ester]		27314-13-2	Norflurazon	1.0
13356-08-6	Fenbutatin oxide	1.0		[4-Chloro-5-(methylamino)-2-[3-(trifluoromethyl)phenyl]-3(2H)-pyridazinone]	
	(Hexakis(2-methyl-2-phenylpropyl) distannoxane)		28057-48-9	d-trans-Allethrin	1.0
13463-40-6	Iron pentacarbonyl	1.0		[d-trans-Chrysanthemic acid of d-allethrine]	
13474-88-9	1,1-Dichloro-1,2,2,3,3-pentafluoropropane (HCFC-225cc)	1.0	28249-77-6	Thiobencarb	1.0
				[Carbamic acid, diethylthio-, S-(p-chlorobenzyl)ester]	
13684-56-5	Desmedipham	1.0	28407-37-6	C.I. Direct Blue 218	1.0
14484-64-1	Ferbam	1.0	29082 74 4	Octachlorostyrene	*
	[Tris(dimethylcarbamodithioato-S,S')iron]		29232-93-7	Pirimiphos methyl	1.0
15972-60-8	Alachlor	1.0		[O-(2-(Diethylamino)-6-methyl-4-pyrimidinyl)-O,O-dimethylphosphorothioate]	
16071-86-6	C.I. Direct Brown 95	0.1	30560-19-1	Acephate	1.0
16543-55-8	N-Nitrosomnicotine	0.1		(Acetylphosphoramidodithioic acid O,S-dimethyl ester)	
17804-35-2	Benomyl	1.0	31218-83-4	Propetamphos	1.0
19044-88-3	Oryzalin	1.0		[3-[(Ethylamino) methoxyphosphinothioyl]oxy]-2-butenic acid, 1-methylethyl ester]	
	[4-(Dipropylamino)-3,5-dinitrobenzenesulfonamide]		33089-61-1	Amitraz	1.0
19666-30-9	Oxydiazon	1.0			
	[3-[2,4-Dichloro-5-(1-methylethoxy) phenyl]-5-(1,1-dimethylethyl)-1,3,4-oxadiazol-2(3H)-one]				
20325-40-0	3,3'-Dimethoxybenzidine dihydrochloride (o-Dianisidine dihydrochloride)	0.1			
20354-26-1	Methazole	1.0			
	[2-(3,4-Dichlorophenyl)-4-methyl-1,2,4-oxadiazolidine-3,5-dione]				

Table II. EPCRA Section 313 Chemical List for Reporting Year 2014

CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>		
34014-18-1	Tebuthiuron [N-[5-(1,1-Dimethylethyl)-1,3,4-thiadiazol-2-yl]-N,N'-dimethylurea]	1.0
34077-87-7	Dichlorotrifluoroethane	1.0
35367-38-5	Diflubenzuron	1.0
35400-43-2	Sulprofos [O-Ethyl O-[4-(methylthio)phenyl]-phosphorodithioic acid S-propyl ester]	1.0
35554-44-0	Imazalil [1-[2-(2,4-Dichlorophenyl)-2-(2-propenyloxy)ethyl]-1H-imidazole]	1.0
35691-65-7	1-Bromo-1-(bromomethyl)-1,3-propanedicarbonitrile	1.0
38727-55-8	Diethyl ethyl	1.0
39156-41-7	2,4-Diaminoanisoole sulfate	0.1
39300-45-3	Dinocap	1.0
39515-41-8	Fenpropathrin [2,2,3,3-Tetramethylcyclopropane carboxylic acid cyano(3-phenoxyphenyl)methyl ester]	1.0
40487-42-1	Pendimethalin [N-(1-Ethylpropyl)-3,4-dimethyl-2,6-dinitrobenzenamine]	*
41198-08-7	Profenofos [O-(4-Bromo-2-chlorophenyl)-O-ethyl-S-propyl phosphorothioate]	1.0
41766-75-0	3,3'-Dimethylbenzidine dihydrofluoride (o-Tolidinedihydrofluoride)	0.1
42874-03-3	Oxyfluorfen	1.0
43121-43-3	Triadimefon [1-(4-Chlorophenoxy)-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl)-2-butanone]	1.0
50471-44-8	Vinclozolin [3-(3,5-Dichlorophenyl)-5-ethenyl-5-methyl-2,4-oxazolidinedione]	1.0
51235-04-2	Hexazinone	1.0
51338-27-3	Diclofop methyl [2-[4-(2,4-Dichlorophenoxy)-phenoxy]propanoic acid, methyl ester]	1.0
51630-58-1	Fenvalerate [4-Chloro-alpha-(1-methylethyl)-benzeneacetic acid cyano(3-phenoxyphenyl)methyl ester]	1.0
52645-53-1	Permethrin [3-(2,2-Dichloroethenyl)-2,2-dimethylcyclopropane carboxylic acid, (3-phenoxyphenyl)methyl ester]	1.0

CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>		
53404-19-6	Bromacil, lithium salt [2,4(1H,3H)-Pyrimidinedione, 5-bromo-6-methyl-3-(1-methylpropyl), lithium salt]	1.0
53404-37-8	2,4-D 2-ethyl-4-methylpentyl ester	0.1
53404-60-7	Dazomet, sodium salt [Tetrahydro-3,5-dimethyl-2H-1,3,5-thiadiazine-2-thione, ion(1-), sodium]	1.0
55290-64-7	Dimethipin [2,3-Dihydro-5,6-dimethyl-1,4-dithiin 1,1,4,4-tetraoxide]	1.0
55406-53-6	3-Iodo-2-propynyl butyl carbamate	1.0
57213-69-1	Triclopyr triethylammonium salt	1.0
59669-26-0	Thiodicarb	1.0
60168-88-9	[.alpha.-(2-Chlorophenyl)-.alpha.-(4-chlorophenyl)-5-pyrimidinemethanol]	1.0
60207-90-1	Propiconazole [1-[2-(2,4-Dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl]-methyl-1H-1,2,4-triazole]	1.0
62476-59-9	Acifluorfen, sodium salt [5-(2-Chloro-4-(trifluoromethyl)phenoxy)-2-nitrobenzoic acid, sodium salt]	1.0
63938-10-3	Chlorotetrafluoroethane	1.0
64902-72-3	Chlorsulfuron [2-Chloro-N-[[[(4-methoxy-6-methyl-1,3,5-triazin-2-yl)amino]carbonyl] benzenesulfonamide]	1.0
64969-34-2	3,3'-Dichlorobenzidine sulfate	0.1
66441-23-4	[2-(4-((6-Chloro-2-benzoxazolyl)oxy)phenoxy)propionic acid, ethyl ester]	1.0
67485-29-4	Hydramethylnon [Tetrahydro-5,5-dimethyl-2(1H)-pyrimidinone[3-[4-(trifluoromethyl)phenyl]-1-[2-[4-(trifluoromethyl)phenyl]ethenyl]-2-propenylidene]hydrazone]	1.0
68085-85-8	Cyhalothrin [3-(2-Chloro-3,3,3-trifluoro-1-propenyl)-2,2-dimethylcyclopropanecarboxylic acid cyano(3-phenoxyphenyl)methyl ester]	1.0
68359-37-5	Cyfluthrin [3-(2,2-Dichloroethenyl)-2,2-dimethylcyclopropanecarboxylic acid, cyano(4-fluoro-3-phenoxyphenyl)methyl ester]	1.0

Table II. EPCRA Section 313 Chemical List for Reporting Year 2014

CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>		
69409-94-5	Fluvalinate [N-[2-Chloro-4-(trifluoromethyl)phenyl]DL-valine(+)-cyano(3-phenoxyphenyl)methyl ester]	1.0
69806-50-4	Fluazifop butyl [2-[4-[[5-(Trifluoromethyl)-2-pyridinyl]oxy]phenoxy]propanoic acid, butyl ester]	1.0
71751-41-2	Abamectin [Avermectin B1]	1.0
72178-02-0	Fomesafen [5-(2-Chloro-4-(trifluoromethyl)phenoxy)-N-methylsulfonyl]-2-nitrobenzamide]	1.0
72490-01-8	Fenoxycarb [[2-(4-Phenoxyphenoxy)ethyl]carbamic acid ethyl ester]	1.0
74051-80-2	Sethoxydim [2-[1-(Ethoxyimino)butyl]-5-[2-(ethylthio)propyl]-3-hydroxyl-2-cyclohexen-1-one]	1.0
76578-14-8	Quizalofop-ethyl [2-[4-[(6-Chloro-2-quinoxalinyloxy]phenoxy]propanoic acid ethyl ester]	1.0
77501-63-4	Lactofen [Benzoic acid, 5-[2-Chloro-4-(trifluoromethyl)phenoxy]-2-nitro-, 2-ethoxy-1-methyl-2-oxoethyl ester]	1.0
82657-04-3	Bifenthrin	1.0
88671-89-0	Myclobutanil [.alpha.-Butyl-.alpha.-(4-chlorophenyl)-1H-1,2,4-triazole-1-propanenitrile]	1.0
90454-18-5	Dichloro-1,1,2-trifluoroethane	1.0
90982-32-4	Chlorimuron ethyl [Ethyl-2-[[[(4-chloro-6-methoxyprimidin-2-yl)amino]carbonyl]amino]sulfonyl]benzoate]	1.0
101200-48-0	Tribenuron methyl [2-[[[(4-Methoxy-6-methyl-1,3,5-triazin-2-yl)methylamino]carbonyl]amino]sulfonyl]benzoic acid methyl ester]	1.0
111512-56-2	1,1-Dichloro-1,2,3,3,3-pentafluoropropane (HCFC-225eb)	1.0
111984-09-9	3,3'-Dimethoxybenzidine hydrochloride (o-Dianisidine hydrochloride)	0.1
127564-92-5	Dichloropentafluoropropane	1.0

CAS Number	Chemical Name	De minimus % Limit
<i>Arranged by CAS Number</i>		
128903-21-9	2,2-Dichloro-1,1,1,3,3,3-pentafluoropropane (HCFC-225aa)	1.0
136013-79-1	1,3-Dichloro-1,1,2,3,3,3-pentafluoropropane (HCFC-225ea)	1.0

**c. Chemical Categories**

Section 313 requires reporting on the EPCRA Section 313 chemical categories listed below, in addition to the specific EPCRA Section 313 chemicals listed above.

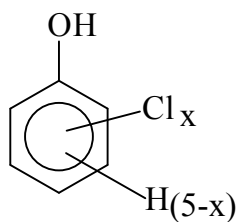
The metal compound categories listed below, unless otherwise specified, are defined as including any unique chemical substance that contains the named metal (e.g., antimony, nickel, etc.) as part of that chemical's structure.

EPCRA Section 313 chemical categories are subject to the 1% *de minimis* concentration unless the substance involved meets the definition of an OSHA carcinogen in which case the 0.1% *de minimis* concentration applies. The *de minimis* concentration for each category is provided in parentheses. The *de minimis* exemption is not available for PBT chemicals, therefore an asterisk appears where a *de minimis* limit would otherwise appear. However, for purposes of the supplier notification requirement only, such limits are provided in Appendix D.

- N010 Antimony Compounds (1.0)**  
*Includes any unique chemical substance that contains antimony as part of that chemical's infrastructure.*
- N020 Arsenic Compounds (inorganic compounds: 0.1; organic compounds: 1.0)**  
*Includes any unique chemical substance that contains arsenic as part of that chemical's infrastructure.*
- N040 Barium Compounds (1.0)**  
*Includes any unique chemical substance that contains barium as part of that chemical's infrastructure. This category does not include: Barium sulfate CAS Number 7727-43-7*
- N050 Beryllium Compounds (0.1)**  
*Includes any unique chemical substance that contains beryllium as part of that chemical's infrastructure.*
- N078 Cadmium Compounds (0.1)**  
*Includes any unique chemical substance that contains cadmium as part of that chemical's infrastructure.*

Table II. EPCRA Section 313 Chemical List for Reporting Year 2014

**N084 Chlorophenols (0.1)**



Where  $x = 1$  to  $5$

**N090 Chromium Compounds**

(except for chromite ore mined in the Transvaal Region of South Africa and the unreacted ore component of the chromite ore processing residue (COPR). COPR is the solid waste remaining after aqueous extraction of oxidized chromite ore that has been combined with soda ash and kiln roasted at approximately 2,000 °F.)

(chromium VI compounds: 0.1; chromium III compounds: 1.0)

Includes any unique chemical substance that contains chromium as part of that chemical's infrastructure.

**N096 Cobalt Compounds (inorganic compounds: 0.1; organic compounds: 1.0)**

Includes any unique chemical substance that contains cobalt as part of that chemical's infrastructure.

**N100 Copper Compounds (1.0)**

Includes any unique chemical substance that contains copper as part of that chemical's infrastructure. This category does not include copper phthalocyanine compounds that are substituted with only hydrogen, and/or chlorine, and/or bromine.

**N106 Cyanide Compounds (1.0)**

$X^+CN^-$  where  $X = H^+$  or any other group where a formal dissociation can be made. For example KCN or  $Ca(CN)_2$

**N120 Diisocyanates (1.0)**

This category includes only those chemicals listed below.

CAS Number	Chemical Name
38661-72-2	1,3-Bis(methylisocyanate) - cyclohexane
10347-54-3	1,4-Bis(methylisocyanate)-cyclohexane
2556-36-7	1,4-Cyclohexane diisocyanate
134190-37-7	Diethyldiisocyanatobenzene
4128-73-8	4,4'-Diisocyanatodiphenyl ether
75790-87-3	2,4'-Diisocyanatodiphenyl sulfide
91-93-0	3,3'-Dimethoxybenzidine-4,4'-diisocyanate
91-97-4	3,3'-Dimethyl-4,4'-diphenylene diisocyanate
139-25-3	3,3'-Dimethyldiphenylmethane-4,4'-diisocyanate
822-06-0	Hexamethylene-1,6-diisocyanate
4098-71-9	Isophorone diisocyanate
75790-84-0	4-Methyldiphenylmethane-3,4-diisocyanate
5124-30-1	1,1-Methylenebis(4-isocyanatocyclohexane)
101-68-8	Methylenebis(phenylisocyanate) (MDI)
3173-72-6	1,5-Naphthalene diisocyanate
123-61-5	1,3-Phenylene diisocyanate
104-49-4	1,4-Phenylene diisocyanate
9016-87-9	Polymeric diphenylmethane diisocyanate
16938-22-0	2,2,4-Trimethylhexamethylene diisocyanate
15646-96-5	2,4,4-Trimethylhexamethylene diisocyanate

**Table II. EPCRA Section 313 Chemical List for Reporting Year 2014**

**N150 Dioxin and dioxin-like compounds (Manufacturing; and the processing or otherwise use of dioxin and dioxin-like compounds if the dioxin and dioxin-like compounds are present as contaminants in a chemical and if they were created during the manufacturing of that chemical.) (\*)** This category includes only those chemicals listed below. [Note: When completing the Form R Schedule 1, enter the data for each member of the category in the order they are listed here (i.e., 1-17).]

Box #	CAS Number	Chemical Name
1	1746-01-6	2,3,7,8-Tetrachlorodibenzo- <i>p</i> -dioxin
2	40321-76-4	1,2,3,7,8-Pentachlorodibenzo- <i>p</i> -dioxin
3	39227-28-6	1,2,3,4,7,8-Hexachlorodibenzo- <i>p</i> -dioxin
4	57653-85-7	1,2,3,6,7,8-Hexachlorodibenzo- <i>p</i> -dioxin
5	19408-74-3	1,2,3,7,8,9-Hexachlorodibenzo- <i>p</i> -dioxin
6	35822-46-9	1,2,3,4,6,7,8-Heptachlorodibenzo- <i>p</i> -dioxin
7	3268-87-9	1,2,3,4,6,7,8,9-Octachlorodibenzo- <i>p</i> -dioxin
8	51207-31-9	2,3,7,8-Tetrachlorodibenzofuran
9	57117-41-6	1,2,3,7,8-Pentachlorodibenzofuran
10	57117-31-4	2,3,4,7,8-Pentachlorodibenzofuran
11	70648-26-9	1,2,3,4,7,8-Hexachlorodibenzofuran
12	57117-44-9	1,2,3,6,7,8-Hexachlorodibenzofuran
13	72918-21-9	1,2,3,7,8,9-Hexachlorodibenzofuran
14	60851-34-5	2,3,4,6,7,8-Hexachlorodibenzofuran
15	67562-39-4	1,2,3,4,6,7,8-Heptachlorodibenzofuran
16	55673-89-7	1,2,3,4,7,8,9-Heptachlorodibenzofuran
17	39001-02-0	1,2,3,4,6,7,8,9-Octachlorodibenzofuran

**N171 Ethylenebisdithiocarbamic acid, salts and esters EBDCs) (1.0)**  
Includes any unique chemical substance that contains an EBDC or an EBDC salt as part of that chemical's infrastructure.

**N230 Certain Glycol Ethers (1.0)**  
R - (OCH<sub>2</sub>CH<sub>2</sub>)<sub>n</sub> - OR'  
where:  
n = 1, 2, or 3;  
R = Alkyl C7 or less; or  
R = phenyl or alkyl substituted phenyl;  
R' = H or alkyl C7 or less; or  
OR' consisting of carboxylic acid ester, sulfate, phosphate, nitrate, or sulfonate.

**N420 Lead Compounds (\*)**  
Includes any unique chemical substance that contains lead as part of that chemical's infrastructure.

**N450 Manganese Compounds (1.0)**  
Includes any unique chemical substance that contains manganese as part of that chemical's infrastructure.

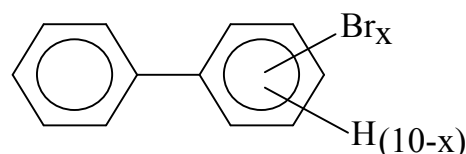
**N458 Mercury Compounds (\*)**  
Includes any unique chemical substance that contains mercury as part of that chemical's infrastructure.

**N495 Nickel Compounds (0.1)**  
Includes any unique chemical substance that contains nickel as part of that chemical's infrastructure.

**N503 Nicotine and salts (1.0)**  
Includes any unique chemical substance that contains nicotine or a nicotine salt as part of that chemical's infrastructure.

**N511 Nitrate compounds (water dissociable; reportable only when in aqueous solution) (1.0)**

**N575 Polybrominated Biphenyls (PBBs) (0.1)**

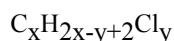


where x = 1 to 10

**Table II. EPCRA Section 313 Chemical List for Reporting Year 2014**

**N583 Polychlorinated alkanes (C<sub>10</sub> to C<sub>13</sub>) (1.0, except for those members of the category that have an average chain length of 12 carbons and contain an average chlorine content of 60% by weight which are subject to the 0.1% *de minimis*)**

*Includes those chemicals defined by the following formula:*



Where x = 10 to 13;

y = 3 to 12; and

where the average chlorine content ranges from 40-70% with the limiting molecular formulas



**N760 Thallium Compounds (1.0)**

*Includes any unique chemical substance that contains thallium as part of that chemical's infrastructure.*

**N770 Vanadium compounds (1.0)**

*Includes any unique chemical substance that contains vanadium as part of that chemical's infrastructure.*

**N874 Warfarin and salts (1.0)**

*Includes any unique chemical substance that contains warfarin or a warfarin salt as part of that chemical's infrastructure.*

**N982 Zinc Compounds (1.0)**

*Includes any unique chemical substance that contains zinc as part of that chemical's infrastructure.*

**N590 Polycyclic aromatic compounds (PACs) (\*)**

This category includes the chemicals listed below.

CAS Number	Chemical Name
56-55-3	Benz(a)anthracene
205-99-2	Benzo(b)fluoranthene
205-82-3	Benzo(j)fluoranthene
207-08-9	Benzo(k)fluoranthene
206-44-0	Benzo(j,k)fluorene
189-55-9	Benzo(r,s,t)pentaphene
218-01-9	Benzo(a)phenanthrene
50-32-8	Benzo(a)pyrene
226-36-8	Dibenz(a,h)acridine
224-42-0	Dibenz(a,j)acridine
53-70-3	Dibenzo(a,h)anthracene
194-59-2	7H-Dibenzo(c,g)carbazole
5385-75-1	Dibenzo(a,e)fluoranthene
192-65-4	Dibenzo(a,e)pyrene
189-64-0	Dibenzo(a,h)pyrene
191-30-0	Dibenzo(a,l)pyrene
57-97-6	7,12-Dimethylbenz(a)-anthracene
42397-64-8	1,6-Dinitropyrene
42397-65-9	1,8-Dinitropyrene
193-39-5	Indeno(1,2,3-cd)pyrene
56-49-5	3-Methylcholanthrene
3697-24-3	5-Methylchrysene
7496-02-8	6-Nitrochrysene
5522-43-0	1-Nitropyrene
57835-92-4	4-Nitropyrene

**N725 Selenium Compounds (1.0)**

*Includes any unique chemical substance that contains selenium as part of that chemical's infrastructure.*

**N740 Silver Compounds (1.0)**

*Includes any unique chemical substance that contains silver as part of that chemical's infrastructure.*

**N746 Strychnine and salts (1.0)**

*Includes any unique chemical substance that contains strychnine or a strychnine salt as part of that chemical's infrastructure.*



### Table III. State Abbreviations

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Alabama	AL	Montana	MT
Alaska	AK	Nebraska	NE
American Samoa	AS	Nevada	NV
Arizona	AZ	New Hampshire	NH
Arkansas	AR	New Jersey	NJ
California	CA	New Mexico	NM
Colorado	CO	New York	NY
Connecticut	CT	North Carolina	NC
Delaware	DE	North Dakota	ND
District of Columbia	DC	Northern Marianas Islands	MP
Florida	FL	Ohio	OH
Georgia	GA	Oklahoma	OK
Guam	GU	Oregon	OR
Hawaii	HI	Pennsylvania	PA
Idaho	ID	Puerto Rico	PR
Illinois	IL	Rhode Island	RI
Indiana	IN	South Carolina	SC
Iowa	IA	South Dakota	SD
Kansas	KS	Tennessee	TN
Kentucky	KY	Texas	TX
Louisiana	LA	Utah	UT
Maine	ME	Vermont	VT
Marshall Islands	MH	Virginia	VA
Maryland	MD	Virgin Islands	VI
Massachusetts	MA	Washington	WA
Michigan	MI	West Virginia	WV
Minnesota	MN	Wisconsin	WI
Mississippi	MS	Wyoming	WY
Missouri	MO		

**Table IV. Federal Information Processing Standards (FIPS)  
Country Codes**

AA	Aruba	CE	Sri Lanka	FS	French Southern and
AC	Antigua and Barbuda	CF	Congo		Antarctic Lands
AE	United Arab		(Brazzaville)	GA	The Gambia
	Emirates	CG	Congo (Kinshasa)	GB	Gabon
AF	Afghanistan	CH	China	GG	Georgia
AG	Algeria	CI	Chile	GH	Ghana
AJ	Azerbaijan	CJ	Cayman Islands	GI	Gibraltar
AL	Albania	CK	Cocos (Keeling)	GJ	Grenada
AM	Armenia		Islands	GK	Guernsey
AN	Andorra	CM	Cameroon	GL	Greenland
AO	Angola	CN	Comoros	GM	Germany
AR	Argentina	CO	Colombia	GO	Glorioso Islands
AS	Australia	CR	Coral Sea Islands	GP	Guadeloupe
AT	Ashmore and Cartier	CS	Costa Rica	GR	Greece
	Islands	CT	Central African	GT	Guatemala
AU	Austria		Republic	GV	Guinea
AV	Anguilla	CU	Cuba	GY	Guyana
AY	Antarctica	CV	Cape Verde	GZ	Gaza Strip
BA	Bahrain	CW	Cook Islands	HA	Haiti
BB	Barbados	CY	Cyprus	HK	Hong Kong
BC	Botswana	DA	Denmark	HM	Heard Island and
BD	Bermuda	DJ	Djibouti		McDonald Islands
BE	Belgium	DO	Dominica	HO	Honduras
BF	The Bahamas	DR	Dominican	HR	Croatia
BG	Bangladesh		Republic	HU	Hungary
BH	Belize	EC	Ecuador	IC	Iceland
BK	Bosnia and	EG	Egypt	ID	Indonesia
	Herzegovina	EI	Ireland	IM	Isle of Man
BL	Bolivia	EK	Equatorial Guinea	IN	India
BM	Burma	EN	Estonia	IO	British Indian Ocean
BN	Benin	ER	Eritrea		Territory
BO	Belarus	ES	El Salvador	IP	Clipperton Island
BP	Solomon Islands	ET	Ethiopia	IR	Iran
BR	Brazil	EU	Europa Island	IS	Israel
BS	Bassas da India	EZ	Czech Republic	IT	Italy
BT	Bhutan	FG	French Guiana	IV	Cote D'Ivoire
BU	Bulgaria	FI	Finland	IZ	Iraq
BV	Bouvet Island	FJ	Fiji	JA	Japan
BX	Brunei	FK	Falkland Islands	JE	Jersey
BY	Burundi		(Islas Malvinas)	JM	Jamaica
CA	Canada	FO	Faroe Islands	JN	Jan Mayen
CB	Cambodia	FP	French Polynesia	JO	Jordan
CD	Chad	FR	France	JU	Juan de Nova Island
KE	Kenya	KS	South Korea	LE	Lebanon
KG	Kyrgyzstan	KT	Christmas Island	LG	Latvia
KN	North Korea	KU	Kuwait	LH	Lithuania
KQ	Kingman Reef	KZ	Kazakhstan	LI	Liberia
KR	Kiribati	LA	Laos	LO	Slovakia

**Table IV. Federal Information Processing Standards (FIPS) Country Codes**

LS	Liechtenstein	PF	Paracel Islands	TH	Thailand
LT	Lesotho	PG	Spratly Islands	TI	Tajikistan
LU	Luxembourg	PK	Pakistan	TK	Turks and Caicos Islands
LY	Libya	PL	Poland	TL	Tokelau
MA	Madagascar	PM	Panama	TN	Tonga
MB	Martinique	PO	Portugal	TO	Togo
MC	Macau	PP	Papua New Guinea	TP	Sao Tome and Principe
MD	Moldova	PS	Palau	TS	Tunisia
MF	Mayotte	PU	Guinea-Bissau	TT	East Timor
MG	Mongolia	QA	Qatar	TU	Turkey
MH	Montserrat	RE	Reunion	TV	Tuvalu
MI	Malawi	RO	Romania	TW	Taiwan
MK	Macedonia	RP	Philippines	TX	Turkmenistan
ML	Mali	RS	Russia	TZ	Tanzania
MN	Monaco	RW	Rwanda	UG	Uganda
MO	Morocco	SA	Saudi Arabia	UK	United Kingdom
MP	Mauritius	SB	St. Pierre and Miquelon	UP	Ukraine
MR	Mauritania	SC	St. Kitts and Nevis	UV	Burkina Faso
MT	Malta	SE	Seychelles	UY	Uruguay
MU	Oman	SF	South Africa	UZ	Uzbekistan
MV	Maldives	SG	Senegal	VC	St. Vincent and the Grenadines
MX	Mexico	SH	St. Helena	VE	Venezuela
MY	Malaysia	SI	Slovenia	VI	British Virgin Islands
MZ	Mozambique	SL	Sierra Leone	VM	Vietnam
NC	New Caledonia	SM	San Marino	VT	Vatican City
NE	Niue	SN	Singapore	WA	Namibia
NF	Norfolk Island	SO	Somalia	WE	West Bank
NG	Niger	SP	Spain	WF	Wallis and Futuna
NH	Vanuatu	ST	St. Lucia	WI	Western Sahara
NI	Nigeria	SU	Sudan	WS	Western Samoa
NL	Netherlands	SV	Svalbard	WZ	Swaziland
NO	Norway	SW	Sweden	YI	Yugoslavia
NP	Nepal	SX	South Georgia and South Sandwich Islands	YM	Yemen
NR	Nauru	SY	Syria	ZA	Zambia
NS	Suriname	SZ	Switzerland	ZI	Zimbabwe
NT	Netherlands Antilles	TD	Trinidad and Tobago		
NU	Nicaragua	TE	Tromelin Island		
NZ	New Zealand				
PA	Paraguay				
PC	Pitcairn Islands				
PE	Peru				

## Table V. Bureau of Indian Affairs (BIA) Tribal Codes

Indian Country Name	BIA Tribe Code
Absentee-Shawnee Tribe of Indians of Oklahoma	820
Agua Caliente Band of Cahuilla Indians of the Agua Caliente Indian Reservation, California	584
Ak Chin Indian Community of the Maricopa (Ak Chin) Indian Reservation, Arizona	612
Alabama-Coushatta Tribes of Texas	830
Alabama-Quassarte Tribal Town, Oklahoma	901
Alturas Indian Rancheria, California	502
Apache Tribe of Oklahoma	809
Arapahoe Tribe of the Wind River Reservation, Wyoming	281
Aroostook Band of Micmac Indians of Maine	31
Assiniboine and Sioux Tribes of the Fort Peck Indian Reservation, Montana	206
Augustine Band of Cahuilla Indians, California (formerly the Augustine Band of Cahuilla Mission Indians of the Augustine Reservation)	567
Bad River Band of the Lake Superior Tribe of Chippewa Indians of the Bad River Reservation, Wisconsin	430
Bay Mills Indian Community, Michigan	470
Bear River Band of the Rohnerville Rancheria, California	560
Berry Creek Rancheria of Maidu Indians of California	504
Big Lagoon Rancheria, California	554
Big Pine Band of Owens Valley Paiute Shoshone Indians of the Big Pine Reservation, California	530
Big Sandy Rancheria of Mono Indians of California	506
Big Valley Band of Pomo Indians of the Big Valley Rancheria, California	507
Blackfeet Tribe of the Blackfeet Indian Reservation of Montana	201
Blue Lake Rancheria, California	558
Bridgeport Paiute Indian Colony of California	691
Buena Vista Rancheria of Me-Wuk Indians of California	508
Burns Paiute Tribe of the Burns Paiute Indian Colony of Oregon	144
Cabazon Band of Mission Indians, California	568
Cachil DeHe Band of Wintun Indians of the Colusa Indian Community of the Colusa Rancheria, California	512
Caddo Nation of Oklahoma	806

Indian Country Name	BIA Tribe Code
Cahto Indian Tribe of the Laytonville Rancheria, California	524
Cahuilla Band of Mission Indians of the Cahuilla Reservation, California	569
California Valley Miwok Tribe, California	628
Campo Band of Diegueno Mission Indians of the Campo Indian Reservation, California	570
Capitan Grande Band of Diegueno Mission Indians of California: Barona Group of Capitan Grande Band of Mission Indians of the Barona Reservation, California; Viejas (Baron Long) Group of Capitan Grande Band of Mission Indians of the Viejas Reservation, California	571
Catawba Indian Nation (aka Catawba Tribe of South Carolina)	32
Cayuga Nation of New York	13
Cedarville Rancheria, California	621
Chemehuevi Indian Tribe of the Chemehuevi Reservation, California	695
Cher-Ae Heights Indian Community of the Trinidad Rancheria, California	566
Cherokee Nation, Oklahoma	905
Cheyenne and Arapaho Tribes, Oklahoma (formerly the Cheyenne-Arapaho Tribes of Oklahoma)	801
Cheyenne River Sioux Tribe of the Cheyenne River Reservation, South Dakota	340
Chickasaw Nation, Oklahoma	906
Chicken Ranch Rancheria of Me-Wuk Indians of California	523
Chippewa-Cree Indians of the Rocky Boy's Reservation, Montana	205
Chitimacha Tribe of Louisiana	970
Choctaw Nation of Oklahoma	907
Citizen Potawatomi Nation, Oklahoma	821
Cloverdale Rancheria of Pomo Indians of California	510
Cocopah Tribe of Arizona	602
Coeur D'Alene Tribe of the Coeur D'Alene Reservation, Idaho	181
Cold Springs Rancheria of Mono Indians of California	511
Colorado River Indian Tribes of the Colorado River Indian Reservation, Arizona and California	603
Comanche Nation, Oklahoma	808
Confederated Salish & Kootenai Tribes of the Flathead Reservation, Montana	203

**Table V. Bureau of Indian Affairs (BIA) Tribal Codes**

<b>Indian Country Name</b>	<b>BIA Tribe Code</b>
Confederated Tribes and Bands of the Yakama Nation, Washington	124
Confederated Tribes of Siletz Indians of Oregon (previously listed as the Confederated Tribes of the Siletz Reservation)	142
Confederated Tribes of the Chehalis Reservation, Washington	105
Confederated Tribes of the Colville Reservation, Washington	101
Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians of Oregon	152
Confederated Tribes of the Goshute Reservation, Nevada and Utah	681
Confederated Tribes of the Grand Ronde Community of Oregon	141
Confederated Tribes of the Umatilla Reservation, Oregon	143
Confederated Tribes of the Warm Springs Reservation of Oregon	145
Coquille Tribe of Oregon	155
Cortina Indian Rancheria of Wintun Indians of California	513
Coushatta Tribe of Louisiana	971
Cow Creek Band of Umpqua Indians of Oregon	153
Cowlitz Indian Tribe, Washington	132
Coyote Valley Band of Pomo Indians of California	638
Crow Creek Sioux Tribe of the Crow Creek Reservation, South Dakota	342
Crow Tribe of Montana	202
Death Valley Timbi-Sha Shoshone Band of California	693
Delaware Nation, Oklahoma	807
Delaware Tribe of Indians, Oklahoma	816
Dry Creek Rancheria of Pomo Indians of California	515
Duckwater Shoshone Tribe of the Duckwater Reservation, Nevada	642
Eastern Band of Cherokee Indians of North Carolina	1
Eastern Shawnee Tribe of Oklahoma	921
Elem Indian Colony of Pomo Indians of the Sulphur Bank Rancheria, California	632
Elk Valley Rancheria, California	559
Ely Shoshone Tribe of Nevada	644
Enterprise Rancheria of Maidu Indians of California	517
Ewiiapaayp Band of Kumeyaay Indians, California	573

<b>Indian Country Name</b>	<b>BIA Tribe Code</b>
Federated Indians of Graton Rancheria, California	622
Flandreau Santee Sioux Tribe of South Dakota	341
Forest County Potawatomi Community, Wisconsin	434
Fort Belknap Indian Community of the Fort Belknap Reservation of Montana	204
Fort Bidwell Indian Community of the Fort Bidwell Reservation of California	518
Fort Independence Indian Community of Paiute Indians of the Fort Independence Reservation, California	525
Fort McDermitt Paiute and Shoshone Tribes of the Fort McDermitt Indian Reservation, Nevada and Oregon	646
Fort McDowell Yavapai Nation, Arizona	613
Fort Mojave Indian Tribe of Arizona, California & Nevada	604
Fort Sill Apache Tribe of Oklahoma	803
Gila River Indian Community of the Gila River Indian Reservation, Arizona	614
Grand Traverse Band of Ottawa and Chippewa Indians, Michigan	468
Greenville Rancheria of Maidu Indians of California	545
Grindstone Indian Rancheria of Wintun-Wailaki Indians of California	519
Habematolel Pomo of Upper Lake, California	636
Hannahville Indian Community, Michigan	471
Havasupai Tribe of the Havasupai Reservation, Arizona	605
Ho-Chunk Nation of Wisconsin	439
Hoh Indian Tribe of the Hoh Indian Reservation, Washington	106
Hoopa Valley Tribe, California	561
Hopi Tribe of Arizona	608
Hopland Band of Pomo Indians of the Hopland Rancheria, California	521
Houlton Band of Maliseet Indians of Maine	19
Hualapai Indian Tribe of the Hualapai Indian Reservation, Arizona	606
Iipay Nation of Santa Ysabel, California (formerly the Santa Ysabel Band of Diegueno Mission Indians of the Santa Ysabel Reservation)	592
Inaja Band of Diegueno Mission Indians of the Inaja and Cosmit Reservation, California	574
Ione Band of Miwok Indians of California	529
Iowa Tribe of Kansas and Nebraska	860

**Table V. Bureau of Indian Affairs (BIA) Tribal Codes**

<b>Indian Country Name</b>	<b>BIA Tribe Code</b>	<b>Indian Country Name</b>	<b>BIA Tribe Code</b>
Iowa Tribe of Oklahoma	822	Los Coyotes Band of Cahuilla and Cupeno Indians, California (formerly the Los Coyotes Band of Cahuilla & Cupeno Indians of the Los Coyotes Reservation)	578
Jackson Rancheria of Me-Wuk Indians of California	522	Lovelock Paiute Tribe of the Lovelock Indian Colony, Nevada	649
Jamestown S'Klallam Tribe of Washington	129	Lower Brule Sioux Tribe of the Lower Brule Reservation, South Dakota	343
Jamul Indian Village of California	575	Lower Elwha Tribal Community of the Lower Elwha Reservation, Washington	125
Jena Band of Choctaw Indians, Louisiana	34	Lower Lake Rancheria, California	625
Jicarilla Apache Nation, New Mexico	701	Lower Sioux Indian Community in the State of Minnesota	402
Kaibab Band of Paiute Indians of the Kaibab Indian Reservation, Arizona	617	Lummi Tribe of the Lummi Reservation, Washington	107
Kalispel Indian Community of the Kalispel Reservation, Washington	103	Lytton Rancheria of California	509
Karuk Tribe (formerly the Karuk Tribe of California)	555	Makah Indian Tribe of the Makah Indian Reservation, Washington	108
Kashia Band of Pomo Indians of the Stewarts Point Rancheria, California	547	Manchester Band of Pomo Indians of the Manchester-Point Arena Rancheria, California	527
Kaw Nation, Oklahoma	810	Manzanita Band of Diegueno Mission Indians of the Manzanita Reservation, California	579
Kewa Pueblo, New Mexico (formerly the Pueblo of Santo Domingo)	717	Mashantucket Pequot Tribe of Connecticut	20
Keweenaw Bay Indian Community, Michigan	475	Mashpee Wampanoag Tribe, Massachusetts	35
Kialegee Tribal Town, Oklahoma	902	Match-e-be-nash-she-wish Band of Pottawatomí Indians of Michigan	484
Kickapoo Traditional Tribe of Texas	826	Mechoopda Indian Tribe of Chico Rancheria, California	531
Kickapoo Tribe of Indians of the Kickapoo Reservation in Kansas	861	Menominee Indian Tribe of Wisconsin	440
Kickapoo Tribe of Oklahoma	823	Mesa Grande Band of Diegueno Mission Indians of the Mesa Grande Reservation, California	580
Kiowa Indian Tribe of Oklahoma	802	Mescalero Apache Tribe of the Mescalero Reservation, New Mexico	702
Klamath Tribes, Oregon	140	Miami Tribe of Oklahoma	925
Kootenai Tribe of Idaho	183	Miccosukee Tribe of Indians of Florida	26
La Jolla Band of Luiseno Indians, California (formerly the La Jolla Band of Luiseno Mission Indians of the La Jolla Reservation)	576	Middletown Rancheria of Pomo Indians of California	528
La Posta Band of Diegueno Mission Indians of the La Posta Indian Reservation, California	577	Minnesota Chippewa Tribe, Minnesota (Six component reservations: Bois Forte Band (Nett Lake); Fond du Lac Band; Grand Portage Band; Leech Lake Band; Mille Lacs Band; White Earth Band)	400
Lac Courte Oreilles Band of Lake Superior Chippewa Indians of Wisconsin	431	Mississippi Band of Choctaw Indians, Mississippi	980
Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin	432	Moapa Band of Paiute Indians of the Moapa River Indian Reservation, Nevada	650
Lac Vieux Desert Band of Lake Superior Chippewa Indians, Michigan	479	Modoc Tribe of Oklahoma	927
Las Vegas Tribe of Paiute Indians of the Las Vegas Indian Colony, Nevada	648		
Little River Band of Ottawa Indians, Michigan	482		
Little Traverse Bay Bands of Odawa Indians, Michigan	483		

## Table V. Bureau of Indian Affairs (BIA) Tribal Codes

Indian Country Name	BIA Tribe Code	Indian Country Name	BIA Tribe Code
Mohegan Indian Tribe of Connecticut	33	Paiute-Shoshone Tribe of the Fallon Reservation and Colony, Nevada	645
Mooretown Rancheria of Maidu Indians of California	626	Pala Band of Luiseno Mission Indians of the Pala Reservation, California	583
Morongo Band of Mission Indians, California (formerly the Morongo Band of Cahuilla Mission Indians of the Morongo Reservation)	582	Pascua Yaqui Tribe of Arizona	665
Muckleshoot Indian Tribe of the Muckleshoot Reservation, Washington	109	Paskenta Band of Nomlaki Indians of California	533
Muscogee (Creek) Nation, Oklahoma	908	Passamaquoddy Tribe of Maine	14
Narragansett Indian Tribe of Rhode Island	27	Pauma Band of Luiseno Mission Indians of the Pauma & Yuima Reservation, California	585
Navajo Nation, Arizona, New Mexico & Utah	780	Pawnee Nation of Oklahoma	812
Nez Perce Tribe, Idaho (previously listed as Nez Perce Tribe of Idaho)	182	Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation, California	586
Nisqually Indian Tribe of the Nisqually Reservation, Washington	110	Penobscot Tribe of Maine	18
Nooksack Indian Tribe of Washington	111	Peoria Tribe of Indians of Oklahoma	926
Northern Cheyenne Tribe of the Northern Cheyenne Indian Reservation, Montana	207	Picayune Rancheria of Chukchansi Indians of California	534
Northfork Rancheria of Mono Indians of California	532	Pinoleville Pomo Nation, California (formerly the Pinoleville Rancheria of Pomo Indians of California)	535
Northwestern Band of Shoshoni Nation of Utah (Washakie)	195	Pit River Tribe, California (includes XL Ranch, Big Bend, Likely, Lookout, Montgomery Creek and Roaring Creek Rancherias)	536
Nottawaseppi Huron Band of the Potawatomi, Michigan (formerly the Huron Potawatomi, Inc.)	481	Pokagon Band of Potawatomi Indians, Michigan and Indiana	480
Oglala Sioux Tribe of the Pine Ridge Reservation, South Dakota	344	Ponca Tribe of Indians of Oklahoma	813
Ohkay Owingeh, New Mexico (formerly the Pueblo of San Juan)	714	Ponca Tribe of Nebraska	381
Omaha Tribe of Nebraska	380	Port Gamble Indian Community of the Port Gamble Reservation, Washington	113
Oneida Nation of New York	11	Potter Valley Tribe, California	537
Oneida Tribe of Indians of Wisconsin	433	Prairie Band of Potawatomi Nation, Kansas	862
Onondaga Nation of New York	6	Prairie Island Indian Community in the State of Minnesota	403
Osage Nation, Oklahoma (formerly the Osage Tribe)	930	Pueblo of Acoma, New Mexico	703
Otoe-Missouria Tribe of Indians, Oklahoma	811	Pueblo of Cochiti, New Mexico	704
Ottawa Tribe of Oklahoma	922	Pueblo of Isleta, New Mexico	705
Paiute Indian Tribe of Utah (Cedar Band of Paiutes, Kanosh Band of Paiutes, Koosharem Band of Paiutes, Indian Peaks Band of Paiutes, and Shivwits Band of Paiutes) (formerly Paiute Indian Tribe of Utah (Cedar City Band of Paiutes, Kanosh Band of Paiutes, Koosharem Band of Paiutes, Indian Peaks Band of Paiutes, and Shivwits Band of Paiutes))	692	Pueblo of Jemez, New Mexico	706
Paiute-Shoshone Indians of the Bishop Community of the Bishop Colony, California	549	Pueblo of Laguna, New Mexico	707
Paiute-Shoshone Indians of the Lone Pine Community of the Lone Pine Reservation, California	624	Pueblo of Nambe, New Mexico	708
		Pueblo of Picuris, New Mexico	709
		Pueblo of Pojoaque, New Mexico	710
		Pueblo of San Felipe, New Mexico	712
		Pueblo of San Ildefonso, New Mexico	713
		Pueblo of Sandia, New Mexico	711
		Pueblo of Santa Ana, New Mexico	715

**Table V. Bureau of Indian Affairs (BIA) Tribal Codes**

<b>Indian Country Name</b>	<b>BIA Tribe Code</b>	<b>Indian Country Name</b>	<b>BIA Tribe Code</b>
Pueblo of Santa Clara, New Mexico	716	San Carlos Apache Tribe of the San Carlos Reservation, Arizona	616
Pueblo of Taos, New Mexico	718	San Juan Southern Paiute Tribe of Arizona	689
Pueblo of Tesuque, New Mexico	719	San Manuel Band of Mission Indians, California (previously listed as the San Manuel Band of Serrano Mission Indians of the San Manuel Reservation)	588
Pueblo of Zia, New Mexico	720	San Pasqual Band of Diegueno Mission Indians of California	589
Puyallup Tribe of the Puyallup Reservation, Washington	115	Santa Rosa Band of Cahuilla Indians, California (formerly the Santa Rosa Band of Cahuilla Mission Indians of the Santa Rosa Reservation)	590
Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation, Nevada	651	Santa Rosa Indian Community of the Santa Rosa Rancheria, California	542
Quapaw Tribe of Indians, Oklahoma	920	Santa Ynez Band of Chumash Mission Indians of the Santa Ynez Reservation, California	591
Quartz Valley Indian Community of the Quartz Valley Reservation of California	563	Santee Sioux Nation, Nebraska	382
Quechan Tribe of the Fort Yuma Indian Reservation, California & Arizona	696	Sauk-Suiattle Indian Tribe of Washington	119
Quileute Tribe of the Quileute Reservation, Washington	116	Sault Ste. Marie Tribe of Chippewa Indians of Michigan	469
Quinault Tribe of the Quinault Reservation, Washington	117	Scotts Valley Band of Pomo Indians of California	503
Ramona Band of Cahuilla, California (formerly the Ramona Band or Village of Cahuilla Mission Indians of California)	597	Seminole Nation of Oklahoma	909
Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin	435	Seminole Tribe of Florida (Dania, Big Cypress, Brighton, Hollywood & Tampa Reservations)	21
Red Lake Band of Chippewa Indians, Minnesota	409	Seneca Nation of New York	12
Redding Rancheria, California	538	Seneca-Cayuga Tribe of Oklahoma	923
Redwood Valley Rancheria of Pomo Indians of California	539	Shakopee Mdewakanton Sioux Community of Minnesota	411
Reno-Sparks Indian Colony, Nevada	653	Shawnee Tribe, Oklahoma	911
Resighini Rancheria, California	556	Sherwood Valley Rancheria of Pomo Indians of California	629
Rincon Band of Luiseno Mission Indians of the Rincon Reservation, California	587	Shingle Springs Band of Miwok Indians, Shingle Springs Rancheria (Verona Tract), California	546
Robinson Rancheria of Pomo Indians of California	516	Shoalwater Bay Tribe of the Shoalwater Bay Indian Reservation, Washington	118
Rosebud Sioux Tribe of the Rosebud Indian Reservation, South Dakota	345	Shoshone Tribe of the Wind River Reservation, Wyoming	282
Round Valley Indian Tribes of the Round Valley Reservation, California	540	Shoshone-Bannock Tribes of the Fort Hall Reservation of Idaho	180
Sac & Fox Nation of Missouri in Kansas and Nebraska	863	Shoshone-Paiute Tribes of the Duck Valley Reservation, Nevada	641
Sac & Fox Nation, Oklahoma	824	Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota	347
Sac & Fox Tribe of the Mississippi in Iowa	490	Skokomish Indian Tribe of the Skokomish Reservation, Washington	120
Saginaw Chippewa Indian Tribe of Michigan	472	Skull Valley Band of Goshute Indians of Utah	682
Saint Regis Mohawk Tribe, New York (formerly the St. Regis Band of Mohawk Indians of New York)	7		
Salt River Pima-Maricopa Indian Community of the Salt River Reservation, Arizona	615		
Samish Indian Tribe, Washington	133		



**Table V. Bureau of Indian Affairs (BIA) Tribal Codes**

<b>Indian Country Name</b>	<b>BIA Tribe Code</b>	<b>Indian Country Name</b>	<b>BIA Tribe Code</b>
Smith River Rancheria, California	564	Turtle Mountain Band of Chippewa Indians of North Dakota	304
Snoqualmie Tribe, Washington	126	Tuscarora Nation of New York	9
Soboba Band of Luiseno Indians, California	593	Twenty-Nine Palms Band of Mission Indians of California	598
Sokaogon Chippewa Community, Wisconsin	437	United Auburn Indian Community of the Auburn Rancheria of California	637
Southern Ute Indian Tribe of the Southern Ute Reservation, Colorado	750	United Keetoowah Band of Cherokee Indians in Oklahoma	904
Spirit Lake Tribe, North Dakota	303	Upper Sioux Community, Minnesota	401
Spokane Tribe of the Spokane Reservation, Washington	102	Upper Skagit Indian Tribe of Washington	131
Squaxin Island Tribe of the Squaxin Island Reservation, Washington	121	Ute Indian Tribe of the Uintah & Ouray Reservation, Utah	687
St. Croix Chippewa Indians of Wisconsin	436	Ute Mountain Tribe of the Ute Mountain Reservation, Colorado, New Mexico & Utah	751
Standing Rock Sioux Tribe of North & South Dakota	302	Utu Utu Gwaitu Paiute Tribe of the Benton Paiute Reservation, California	520
Stillaguamish Tribe of Washington	139	Walker River Paiute Tribe of the Walker River Reservation, Nevada	656
Stockbridge Munsee Community, Wisconsin	438	Wampanoag Tribe of Gay Head (Aquinnah) of Massachusetts	30
Summit Lake Paiute Tribe of Nevada	655	Washoe Tribe of Nevada & California (Carson Colony, Dresslerville Colony, Woodfords Community, Stewart Community, & Washoe Ranches)	672
Suquamish Indian Tribe of the Port Madison Reservation, Washington	114	White Mountain Apache Tribe of the Fort Apache Reservation, Arizona	607
Susanville Indian Rancheria, California	550	Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie), Oklahoma	804
Swinomish Indians of the Swinomish Reservation, Washington	122	Winnebago Tribe of Nebraska	383
Sycuan Band of the Kumeyaay Nation	594	Winnemucca Indian Colony of Nevada	659
Table Mountain Rancheria of California	551	Wiyot Tribe, California (formerly the Table Bluff Reservation—Wiyot Tribe)	565
Te-Moak Tribe of Western Shoshone Indians of Nevada (Four constituent bands: Battle Mountain Band; Elko Band; South Fork Band and Wells Band)	640	Wyandotte Nation, Oklahoma	924
Thlopthlocco Tribal Town, Oklahoma	903	Yankton Sioux Tribe of South Dakota	346
Three Affiliated Tribes of the Fort Berthold Reservation, North Dakota	301	Yavapai-Apache Nation of the Camp Verde Indian Reservation, Arizona	601
Tohono O'odham Nation of Arizona	610	Yavapai-Prescott Tribe of the Yavapai Reservation, Arizona	618
Tonawanda Band of Seneca Indians of New York	8	Yerington Paiute Tribe of the Yerington Colony & Campbell Ranch, Nevada	660
Tonkawa Tribe of Indians of Oklahoma	814	Yocha Dehe Wintun Nation, California (formerly the Rumsey Indian Rancheria of Wintun Indians of California)	541
Tonto Apache Tribe of Arizona	674	Yomba Shoshone Tribe of the Yomba Reservation, Nevada	661
Torres Martinez Desert Cahuilla Indians, California (formerly the Torres-Martinez Band of Cahuilla Mission Indians of California)	595		
Tulalip Tribes of the Tulalip Reservation, Washington	123		
Tule River Indian Tribe of the Tule River Reservation, California	553		
Tunica-Biloxi Indian Tribe of Louisiana	336		
Tuolumne Band of Me-Wuk Indians of the Tuolumne Rancheria of California	634		

## Table V. Bureau of Indian Affairs (BIA) Tribal Codes

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Indian Country Name	BIA Tribe Code
Ysleta Del Sur Pueblo of Texas	725
Yurok Tribe of the Yurok Reservation, California	562
Zuni Tribe of the Zuni Reservation, New Mexico	721

## Table VI. Removal and Destruction Rates for POTWs

When completing Section 8 of the Form R, facilities should use their best readily available information to determine the final disposition of toxic chemical sent to the publicly owned treatment works (POTW) and then distribute the amount reported in Section 6.1 among Sections 8.1c, 8.1d, and 8.7, as appropriate. Table VI presents data from EPA's Risk-Screening Environmental Indicators (RSEI) model that can be used to assist with these calculations.

To predict the fate and transport of TRI chemicals, the RSEI model uses estimates of chemical removal efficiencies at POTWs and of the ultimate fate of the chemical amount removed. The amount of the chemical removed is divided into the percentages removed by (1) sorbing to sludge, (2) volatilizing into the air or (3) being biodegraded by microorganisms. Table VI assigns the portion of the influent diverted to sludge to Section 8.1c (off-site disposal to landfills and Class I UIC wells), the portion volatilizing into the air to Section 8.1d (other off-site releases), and the portion being biodegraded to Section 8.7 (off-site treatment). The percentage of the influent chemical that passes through the POTW and is not removed is also assigned to Section 8.1d.

POTW removal efficiencies are a function of many factors, including the treatment technology in place at the POTW. Information about the final disposition of chemicals at the specific POTW in question should therefore be used in place of the percentages in Table VI if available. Additional documentation for the values presented in Table VI can be found in Technical Appendix B of the RSEI Model Documentation, available at: <http://www2.epa.gov/toxics-release-inventory-tri-program/documentation-potw-removal-rates>.

TRI-MEweb will use the percentages below to calculate values for Sections 8.1c, 8.1d, and 8.7 unless you replace these default percentages with location-specific estimates of removal and destruction rates for the POTW in question. For chemicals not included in this table, TRI-MEweb's default assumption is that 100% of the chemical sent to the POTW is treated for destruction.

CAS Number	Chemical Name	% of §6.1 to §:		
		8.1c	8.1d	8.7
<i>Arranged by CAS Number</i>				
50-00-0	Formaldehyde	0	8	92
51-03-6	Piperonyl butoxide	39	3	58
51-21-8	Fluorouracil	1	55	44
51-28-5	2,4-Dinitrophenol	1	24	75
51-79-6	Urethane (Ethyl carbamate)	1	55	44
52-68-6	Trichlorfon	0	8	92
53-96-3	2-Acetylaminofluorene	5	42	53
55-63-0	Nitroglycerin	1	24	75
56-23-5	Carbon tetrachloride	2	88	10
56-38-2	Parathion	9	2	89
57-14-7	1,1-Dimethyl hydrazine	1	25	74
57-33-0	Pentobarbital sodium	2	53	45
57-41-0	Phenytoin	2	51	47
57-74-9	Chlordane	61	1	38
58-89-9	Lindane	13	24	63
60-09-3	4-Aminoazobenzene	8	35	57
60-11-7	4-Dimethylaminoazobenzene	35	5	60
60-34-4	Methyl hydrazine	1	25	74
60-35-5	Acetamide	0	8	92
60-51-5	Dimethoate	1	55	44
61-82-5	Amitrole	1	55	44
62-53-3	Aniline	0	8	92
62-55-5	Thioacetamide	1	55	44
62-56-6	Thiourea	1	25	74
62-73-7	Dichlorvos	1	25	74

CAS Number	Chemical Name	% of §6.1 to §:		
		8.1c	8.1d	8.7
<i>Arranged by CAS Number</i>				
62-74-8	Sodium fluoroacetate	1	25	74
63-25-2	Carbaryl	1	12	87
64-18-6	Formic acid	0	8	92
64-67-5	Diethyl sulfate	0	5	95
64-75-5	Tetracycline hydrochloride	1	55	44
67-56-1	Methanol	0	8	92
67-66-3	Chloroform	1	73	26
67-72-1	Hexachloroethane	18	56	26
68-12-2	N,N-Dimethylformamide	0	8	92
70-30-4	Hexachlorophene	62	1	37
71-36-3	n-Butyl alcohol	0	8	92
71-43-2	Benzene	1	23	76
71-55-6	1,1,1-trichloroethane	1	95	4
72-43-5	Methoxychlor	45	2	53
72-57-1	Trypan blue	1	55	44
74-83-9	Bromomethane	0	80	20
74-85-1	Ethylene	0	92	8
74-87-3	Chloromethane	1	59	40
74-88-4	Methyl iodide	1	78	21
74-90-8	Hydrogen cyanide	2	98	0
74-95-3	Methylene bromide	1	61	38
75-00-3	Chloroethane	1	85	14
75-01-4	Vinyl chloride	0	92	8
75-05-8	Acetonitrile	1	25	74
75-07-0	Acetaldehyde	0	9	91

**Table VI. Removal and Destruction Rates for POTWs**

CAS Number	Chemical Name	% of §6.1 to §:			CAS Number	Chemical Name	% of §6.1 to §:		
		8.1c	8.1d	8.7			8.1c	8.1d	8.7
<i>Arranged by CAS Number</i>					<i>Arranged by CAS Number</i>				
75-09-2	Dichloromethane	1	44	55	79-10-7	Acrylic acid	0	8	92
75-15-0	Carbon disulfide	1	87	12	79-11-8	Chloroacetic acid	0	8	92
75-21-8	Ethylene oxide	0	9	91	79-19-6	Thiosemicarbazide	1	55	44
75-25-2	Bromoform	2	57	41	79-21-0	Peracetic acid	0	8	92
75-27-4	Dichlorobromomethane	1	68	31	79-22-1	Methyl chlorocarbonate	0	1	99
75-34-3	Ethylidene dichloride	1	78	21	79-34-5	1,1,2,2-Tetrachloroethane	2	78	20
75-35-4	Vinylidene chloride	1	91	8	79-44-7	Dimethylcarbamyl chloride	0	0	100
75-43-4	Dichlorofluoromethane	1	91	8	79-46-9	2-Nitropropane	1	26	73
75-44-5	Phosgene	0	0	100	80-05-7	4,4'-Isopropylidenediphenol	5	14	81
75-45-6	Chlorodifluoromethane	1	88	11	80-15-9	Cumene hydroperoxide	1	24	75
75-55-8	Propyleneimine	1	25	74	80-62-6	Methyl methacrylate	0	10	90
75-56-9	Propylene oxide	0	9	91		Saccharin (only persons who manufacture are subject, no supplier notification)			
75-63-8	Bromotrifluoromethane	0	99	1	81-07-2		1	25	74
75-65-0	tert-Butyl alcohol	1	55	44	82-68-8	Quintozene	43	11	46
75-68-3	1-Chloro-1,1-difluoroethane	1	98	1	84-74-2	Dibutyl phthalate	29	1	70
75-69-4	Trichlorofluoromethane (CFC-11)	1	98	1	85-01-8	Phenanthrene	32	6	62
75-71-8	Dichlorodifluoromethane (CFC-12)	0	99	1	85-44-9	Phthalic anhydride	0	1	99
75-72-9	Chlorotrifluoromethane (CFC-13)	0	99	1	86-30-6	N-Nitrosodiphenylamine	5	42	53
75-86-5	2-Methylacetonitrile	0	0	100	87-62-7	2,6-Xyldine	2	53	45
75-88-7	2-Chloro-1,1,1-trifluoroethane	0	99	1	87-68-3	Hexachloro-1,3-butadiene	45	23	32
76-01-7	Pentachloroethane	6	75	19	87-86-5	Pentachlorophenol (PCP)	54	4	42
76-06-2	Chloropicrin	1	88	11	88-06-2	2,4,6-Trichlorophenol	9	9	82
76-13-1	Freon 113	3	96	1	88-75-5	2-Nitrophenol	1	59	40
76-14-2	Dichlorotetrafluoroethane (CFC-114)	2	97	1	88-85-7	Dinitrobutyl phenol	12	54	34
76-15-3	Monochloropentafluoroethane (CFC-115)	1	98	1	88-89-1	Picric acid	1	78	21
76-44-8	Heptachlor	50	1	49	90-04-0	o-Anisidine	1	25	74
76-87-9	Triphenyltin hydroxide	14	86	0	90-43-7	2-Phenylphenol	3	5	92
77-47-4	Hexachlorocyclopentadiene	44	11	45	91-08-7	Toluene-2,6-diisocyanate	2	1	97
77-73-6	Dicyclopentadiene	7	84	9	91-20-3	Naphthalene	4	6	90
77-78-1	Dimethyl sulfate	0	3	97	91-22-5	Quinoline	1	24	75
78-48-8	S,S,S-Tributyltrithiophosphate (DEF)	37	0	63	91-59-8	beta-Naphthylamine	1	23	76
78-84-2	Isobutyraldehyde	0	9	91	91-94-1	3,3'-Dichlorobenzidine	9	32	59
78-87-5	1,2-Dichloropropane	1	70	29	92-52-4	Biphenyl	10	2	88
78-88-6	2,3-Dichloropropene	1	67	32	92-67-1	4-Aminobiphenyl	3	47	50
78-92-2	sec-Butyl alcohol	0	8	92	92-87-5	Benzidine	1	25	74
79-00-5	1,1,2-Trichloroethane	1	82	17	93-65-2	Mecoprop	5	42	53
79-01-6	Trichloroethylene	1	93	6	94-11-1	2,4-D isopropyl ester	8	2	90
79-06-1	Acrylamide	0	8	92	94-36-0	Benzoyl peroxide	5	3	92
					94-58-6	Dihydrosafrole	10	30	60
					94-59-7	Safrole	8	34	58
					94-74-6	Methoxone ((4-Chloro-2-	6	39	55

**Table VI. Removal and Destruction Rates for POTWs**

CAS Number	Chemical Name	% of §6.1 to §:		
		8.1c	8.1d	8.7
<i>Arranged by CAS Number</i>				
	methylphenoxy) acetic acid) (MCPA)			
94-75-7	2,4-D	2	6	92
94-80-4	2,4-D butyl ester	15	1	84
95-47-6	o-Xylene	3	16	81
95-48-7	o-Cresol	0	8	92
95-50-1	1,2-Dichlorobenzene	7	47	46
95-53-4	o-Toluidine	0	94	6
95-54-5	1,2-Phenylenediamine	1	55	44
95-63-6	1,2,4-Trimethylbenzene	11	21	68
95-80-7	2,4-Diaminotoluene	1	55	44
95-95-4	2,4,5-Trichlorophenol	13	25	62
96-09-3	Styrene oxide	1	25	74
96-12-8	1,2-Dibromo-3-chloropropane (DBCP)	4	72	24
96-18-4	1,2,3-Trichloropropane	2	56	42
96-33-3	Methyl acrylate	0	9	91
96-45-7	Ethylene thiourea	1	55	44
98-07-7	Benzoic trichloride	0	0	100
98-82-8	Cumene	7	13	80
98-86-2	Acetophenone	0	8	92
98-87-3	Benzal chloride	0	0	100
98-88-4	Benzoyl chloride	0	0	100
98-95-3	Nitrobenzene	0	8	92
99-55-8	5-Nitro-o-toluidine	1	54	45
99-65-0	m-Dinitrobenzene	1	54	45
100-01-6	p-Nitroaniline	1	54	45
100-02-7	4-Nitrophenol	0	93	7
100-25-4	p-Dinitrobenzene	1	54	45
100-41-4	Ethylbenzene	3	45	52
100-42-5	Styrene	2	13	85
100-44-7	Benzyl chloride	1	27	72
100-75-4	N-Nitrosopiperidine	1	55	44
101-05-3	Anilazine	16	19	65
101-14-4	4,4'-Methylenebis(2-chloroaniline) (MBOCA)	17	18	65
101-77-9	4,4'-Methylenedianiline	1	24	75
101-80-4	4,4'-Diaminodiphenyl ether	1	24	75
101-90-6	Diglycidyl resorcinol ether	1	25	74
105-67-9	2,4-Dimethylphenol	1	23	76
106-42-3	p-Xylene	3	19	78
106-44-5	p-Cresol	0	8	92
106-46-7	1,4-Dichlorobenzene	7	49	44

CAS Number	Chemical Name	% of §6.1 to §:		
		8.1c	8.1d	8.7
<i>Arranged by CAS Number</i>				
106-47-8	p-Chloroaniline	1	54	45
106-50-3	p-Phenylenediamine	1	55	44
106-51-4	Quinone	1	59	40
106-88-7	1,2-Butylene oxide	0	27	73
106-89-8	Epichlorohydrin	1	55	44
106-93-4	1,2-Dibromoethane	1	60	39
106-99-0	1,3-Butadiene	1	86	13
107-02-8	Acrolein	0	9	91
107-05-1	Allyl chloride	1	85	14
107-06-2	1,2-Dichloroethane	1	64	35
107-11-9	Allylamine	1	25	74
107-13-1	Acrylonitrile	0	9	91
107-18-6	Allyl alcohol	0	8	92
107-19-7	Propargyl alcohol	0	8	92
107-21-1	Ethylene glycol	0	8	92
107-30-2	Chloromethyl methyl ether	0	0	100
108-05-4	Vinyl acetate	0	11	89
108-10-1	Methyl isobutyl ketone	0	9	91
108-31-6	Maleic anhydride	0	0	100
108-38-3	m-Xylene	3	18	79
108-39-4	m-Cresol	0	8	92
108-45-2	1,3-Phenylenediamine	1	55	44
108-60-1	Bis(2-chloro-1-methylethyl) ether	2	53	45
108-88-3	Toluene	1	23	76
108-90-7	Chlorobenzene	2	39	59
108-93-0	Cyclohexanol	0	9	91
108-95-2	Phenol	0	8	92
109-06-8	2-Methylpyridine	0	8	92
109-77-3	Malononitrile	1	55	44
109-86-4	2-Methoxyethanol	0	8	92
110-54-3	n-Hexane	9	53	38
110-57-6	trans-1,4-Dichloro-2-butene	2	27	71
110-80-5	2-Ethoxyethanol	0	8	92
110-82-7	Cyclohexane	6	19	75
110-86-1	Pyridine	0	8	92
111-42-2	Diethanolamine	0	8	92
111-44-4	Bis(2-chloroethyl) ether	2	78	20
111-91-1	Bis(2-chloroethoxy) methane	1	78	21
114-26-1	Propoxur	0	8	92
115-07-1	Propylene (Propene)	0	91	9

**Table VI. Removal and Destruction Rates for POTWs**

CAS Number	Chemical Name	% of §6.1 to §:		
		8.1c	8.1d	8.7
<i>Arranged by CAS Number</i>				
115-32-2	Dicofol	44	2	54
116-06-3	Aldicarb	1	54	45
117-79-3	2-Aminoanthraquinone	2	52	46
117-81-7	Di(2-ethylhexyl) phthalate	38	0	62
118-74-1	Hexachlorobenzene	60	2	38
119-90-4	3,3'-Dimethoxybenzidine	1	54	45
119-93-7	3,3'-Dimethylbenzidine	1	23	76
120-12-7	Anthracene	31	8	61
120-36-5	2,4-DP	8	34	58
120-58-1	Isosafrole	7	36	57
120-71-8	p-Cresidine	1	54	45
120-80-9	Catechol	0	8	92
120-82-1	1,2,4-Trichlorobenzene	19	22	59
120-83-2	2,4-Dichlorophenol	3	5	92
121-14-2	2,4-Dinitrotoluene	1	54	45
121-44-8	Triethylamine	1	56	43
121-69-7	N,N-Dimethylaniline	2	53	45
121-75-5	Malathion	1	7	92
122-34-9	Simazine	2	77	21
122-39-4	Diphenylamine	7	12	81
122-66-7	1,2-Diphenylhydrazine	4	46	50
123-31-9	Hydroquinone	0	8	92
123-38-6	Propionaldehyde	0	9	91
123-63-7	Paraldehyde	1	55	44
123-72-8	Butyraldehyde	0	9	91
123-91-1	1,4-Dioxane	1	55	44
124-40-3	Dimethylamine	0	8	92
124-73-2	Dibromotetrafluoroethane	2	97	1
126-98-7	Methacrylonitrile	1	27	72
126-99-8	Chloroprene	1	93	6
127-18-4	Tetrachloroethylene (Perchloroethylene)	6	87	7
128-03-0	Potassium dimethyldithiocarbamate	1	28	71
128-04-1	Sodium dimethyldithiocarbamate	1	28	71
131-11-3	Dimethyl phthalate	0	8	92
132-64-9	Dibenzofuran	18	4	78
133-06-2	Captan	1	23	76
133-07-3	Folpet	2	20	78
134-32-7	alpha-Naphthylamine	1	24	75
136-45-8	Dipropyl isocinchomeronate	6	3	91
137-26-8	Thiram	1	24	75

CAS Number	Chemical Name	% of §6.1 to §:		
		8.1c	8.1d	8.7
<i>Arranged by CAS Number</i>				
137-41-7	Potassium N-methyldithiocarbamate	0	27	73
137-42-8	Metham sodium	0	27	73
139-13-9	Nitrilotriacetic acid	0	8	92
140-88-5	Ethyl acrylate	0	10	90
141-32-2	Butyl acrylate	1	9	90
142-59-6	Nabam	0	10	90
148-79-8	Thiabendazole	2	51	47
149-30-4	2-Mercaptobenzothiazole (MBT)	2	52	46
150-50-5	Merphos	22	0	78
151-56-4	Ethyleneimine (Aziridine)	1	55	44
156-62-7	Calcium cyanamide	2	98	0
298-00-0	Methyl parathion	2	6	92
300-76-5	Naled	1	25	74
302-01-2	Hydrazine	0	15	85
306-83-2	2,2-Dichloro-1,1,1-trifluoroethane	1	98	1
309-00-2	Aldrin	62	1	37
314-40-9	Bromacil	2	53	45
330-54-1	Diuron	2	50	48
330-55-2	Linuron	5	41	54
333-41-5	Diazinon	12	7	81
353-59-3	Bromochlorodifluoromethane	1	98	1
354-11-0	1,1,1,2-Tetrachloro-2-fluoroethane (HCFC-121a)	3	84	13
354-14-3	1,1,2,2-Tetrachloro-1-fluoroethane (HCFC-121)	3	84	13
354-23-4	1,2-Dichloro-1,1,2-trifluoroethane	1	98	1
354-25-6	1-Chloro-1,1,2,2-tetrafluoroethane	0	99	1
357-57-3	Brucine	1	55	44
422-56-0	3,3-Dichloro-1,1,1,2,2-pentafluoropropane	3	96	1
460-35-5	3-Chloro-1,1,1-trifluoropropane	1	98	1
463-58-1	Carbonyl sulfide	0	84	16
465-73-6	Isodrin	62	1	37
492-80-8	C.I. Solvent Yellow 34 (Auramine)	2	50	48
505-60-2	Mustard gas	0	0	100
507-55-1	1,3-Dichloro-1,1,2,2,3-pentafluoropropane	3	96	1
510-15-6	Chlorobenzilate	39	3	58
528-29-0	o-Dinitrobenzene	1	54	45
533-74-4	Dazomet	0	3	97
534-52-1	4,6-Dinitro-o-cresol	2	53	45

**Table VI. Removal and Destruction Rates for POTWs**

CAS Number	Chemical Name	% of §6.1 to §:		
		8.1c	8.1d	8.7
<i>Arranged by CAS Number</i>				
540-59-0	1,2-Dichloroethylene	1	74	25
541-41-3	Ethyl chloroformate	1	43	56
541-53-7	2,4-Dithiobiuret	1	51	48
541-73-1	1,3-Dichlorobenzene	8	47	45
542-75-6	1,3-Dichloropropylene	1	44	55
542-76-7	3-Chloropropionitrile	1	55	44
542-88-1	Bis(chloromethyl) ether	0	0	100
554-13-2	Lithium carbonate	2	98	0
556-61-6	Methyl isothiocyanate	0	0	100
563-47-3	3-Chloro-2-methyl-1-propene	1	93	6
584-84-9	Toluene-2,4-diisocyanate	2	1	97
606-20-2	2,6-Dinitrotoluene	2	53	45
612-83-9	3,3'-Dichlorobenzidine dihydrochloride	9	32	59
621-64-7	N-Nitrosodi-n-propylamine	1	54	45
624-83-9	Methyl isocyanate	0	0	100
630-20-6	1,1,1,2-Tetrachloroethane	3	82	15
636-21-5	o-Toluidine hydrochloride	1	54	45
684-93-5	N-Nitroso-N-methylurea	1	55	44
709-98-8	Propanil (N-(3,4-Dichlorophenyl)propanamide)	4	44	52
759-73-9	N-Nitroso-N-ethylurea	1	55	44
759-94-4	Ethyl dipropylthiocarbamate (EPTC)	5	41	54
764-41-0	1,4-Dichloro-2-butene	1	84	15
834-12-8	Ametryn	4	45	51
872-50-4	N-Methyl-2-pyrrolidone	0	8	92
924-42-5	N-Methylolacrylamide	0	8	92
961-11-5	Tetrachlorvinphos	7	11	82
1120-71-4	Propane sultone	1	29	70
1163-19-5	Decabromodiphenyl oxide	62	1	37
1313-27-5	Molybdenum trioxide	2	98	0
1314-20-1	Thorium dioxide	90	10	0
1319-77-3	Cresol (mixed isomers)	0	8	92
1320-18-9	2,4-D propylene glycol butyl ether ester	15	0	85
1330-20-7	Xylene (mixed isomers)	3	17	80
1336-36-3	Polychlorinated biphenyls (PCBs)	61	1	38
1344-28-1	Aluminum oxide (fibrous forms)	2	98	0
1464-53-5	Diepoxybutane	1	25	74
1563-66-2	Carbofuran	1	7	92
1582-09-8	Trifluralin	57	3	40
1634-04-4	Methyl tert-butyl ether	1	60	39

CAS Number	Chemical Name	% of §6.1 to §:		
		8.1c	8.1d	8.7
<i>Arranged by CAS Number</i>				
1649-08-7	1,2-Dichloro-1,1-difluoroethane	1	97	2
1689-84-5	Bromoxynil	6	13	81
1689-99-2	Bromoxynil octanoate	38	0	62
1717-00-6	1,1-Dichloro-1-fluoroethane	1	96	3
1861-40-1	Benfluralin	56	3	41
1897-45-6	Chlorothalonil	3	18	79
1910-42-5	Paraquat dichloride	1	55	44
1912-24-9	Atrazine	3	74	23
1918-00-9	Dicamba	1	53	46
1918-02-1	Picloram	2	90	8
1918-16-7	Propachlor	1	24	75
1928-43-4	2,4-D 2-ethylhexyl ester	22	0	78
1929-73-3	2,4-D butoxyethyl ester	12	1	87
1929-82-4	Nitrapyrin (2-Chloro-6-(trichloromethyl)pyridine)	7	36	57
1982-69-0	Sodium dicamba	1	53	46
2164-07-0	Dipotassium endothall	1	24	75
2164-17-2	Fluometuron	2	52	46
2234-13-1	Octachloronaphthalene	62	1	37
2300-66-5	Dimethylamine dicamba	1	54	45
2303-16-4	Diallate	21	14	65
2303-17-5	Triallate	35	5	60
2312-35-8	Propargite	42	44	14
2699-79-8	Sulfuryl fluoride	2	98	0
2702-72-9	2,4-D sodium salt	2	6	92
2837-89-0	2-Chloro-1,1,1,2-tetrafluoroethane	0	99	1
2971-38-2	2,4-D chlorocrotyl ester	16	0	84
3383-96-8	Temephos	38	0	62
3653-48-3	Methoxone sodium salt ((4-Chloro-2-methylphenoxy) acetate sodium salt)	1	25	74
4080-31-3	1-(3-Chloroallyl)-3,5,7-triaza-1-azoniaadamantane chloride	1	55	44
4170-30-3	Crotonaldehyde	0	10	90
4549-40-0	N-Nitrosomethylvinylamine	9	51	40
5234-68-4	Carboxin	1	24	75
7287-19-6	Prometryn	11	56	33
7429-90-5	Aluminum (fume or dust)	66	34	0
7439-92-1	Lead	63	37	NA
7439-96-5	Manganese	39	61	NA
7439-97-6	Mercury	69	31	NA
7440-02-0	Nickel	38	62	NA

**Table VI. Removal and Destruction Rates for POTWs**

CAS Number	Chemical Name	% of §6.1 to §:		
		8.1c	8.1d	8.7
<i>Arranged by CAS Number</i>				
7440-22-4	Silver	66	34	NA
7440-28-0	Thallium	54	46	NA
7440-36-0	Antimony	32	68	NA
7440-38-2	Arsenic	49	51	NA
7440-39-3	Barium	69	31	NA
7440-41-7	Beryllium	37	63	NA
7440-43-9	Cadmium	68	32	NA
7440-47-3	Chromium	76	24	NA
7440-48-4	Cobalt	32	68	NA
7440-50-8	Copper	72	28	NA
7440-62-2	Vanadium (except when contained in an alloy)	32	68	NA
7440-66-6	Zinc (fume or dust)	66	34	NA
7550-45-0	Titanium tetrachloride	2	98	0
7632-00-0	Sodium nitrite	2	98	0
7637-07-2	Boron trifluoride	2	98	0
7647-01-0	Hydrochloric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)	0	0	100
7664-39-3	Hydrogen fluoride	2	98	0
7664-41-7	Ammonia	0	40	60
7664-93-9	Sulfuric acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size)	0	0	100
7697-37-2	Nitric acid	0	0	100
7723-14-0	Phosphorus (yellow or white)	60	40	0
7726-95-6	Bromine	2	98	0
7758-29-4	Potassium bromate	2	98	0
7782-41-4	Fluorine	2	98	0
7782-49-2	Selenium	44	56	NA
7782-50-5	Chlorine	2	98	0
7803-51-2	Phosphine	2	98	0
8001-35-2	Toxaphene	62	1	37
10028-15-6	Ozone	2	98	0
10034-93-2	Hydrazine sulfate	2	98	0
10049-04-4	Chlorine dioxide	2	98	0
10061-02-6	trans-1,3-Dichloropropene	1	31	68
10294-34-5	Boron trichloride	2	98	0
12122-67-7	Zineb	0	2	98
12427-38-2	Maneb	2	98	0
13194-48-4	Ethoprop	10	29	61

CAS Number	Chemical Name	% of §6.1 to §:		
		8.1c	8.1d	8.7
<i>Arranged by CAS Number</i>				
13684-56-5	Desmedipham	5	9	86
15972-60-8	Alachlor	7	11	82
17804-35-2	Benomyl	1	49	50
19044-88-3	Oryzalin	3	49	48
19666-30-9	Oxydiazon	40	3	57
20325-40-0	3,3'-Dimethoxybenzidine dihydrochloride (o-Dianisidine dihydrochloride)	1	55	44
20816-12-0	Osmium tetroxide	2	98	0
20859-73-8	Aluminum phosphide	2	98	0
21087-64-9	Metribuzin	1	54	45
21725-46-2	Cyanazine	2	76	22
22781-23-3	Bendiocarb	1	23	76
23564-05-8	Thiophanate-methyl	1	25	74
23950-58-5	Pronamide	10	30	60
25321-14-6	Dinitrotoluene (mixed isomers)	1	53	46
25321-22-6	Dichlorobenzene (mixed isomers)	8	47	45
25376-45-8	Diaminotoluene (mixed isomers)	1	78	21
26002-80-2	Phenothrin	38	0	62
26471-62-5	Toluene diisocyanate (mixed isomers)	2	1	97
26628-22-8	Sodium azide	2	98	0
28249-77-6	Thiobencarb	8	35	57
30560-19-1	Acephate	1	55	44
34014-18-1	Tebuthiuron	2	77	21
34077-87-7	Dichlorotrifluoroethane	1	98	1
35367-38-5	Diflubenzuron	13	6	81
35554-44-0	Imazalil	15	21	64
40487-42-1	Pendimethalin	47	1	52
42874-03-3	Oxyfluorfen	39	3	58
43121-43-3	Triadimefon	3	48	49
51235-04-2	Hexazinone	19	16	65
52645-53-1	Permethrin	38	0	62
53404-37-8	2,4-D 2-ethyl-4-methylpentyl ester	21	0	79
55290-64-7	Dimethipin	1	55	44
55406-53-6	3-Iodo-2-propynyl butylcarbamate	1	23	76
57213-69-1	Triclopyr triethylammonium salt	1	25	74
59669-26-0	Thiodicarb	1	24	75
60207-90-1	Propiconazole	9	32	59
62476-59-9	Acifluorfen, sodium salt	12	25	63



**Table VI. Removal and Destruction Rates for POTWs**

CAS Number	Chemical Name	% of §6.1 to §:		
		8.1c	8.1d	8.7
<i>Arranged by CAS Number</i>				
64902-72-3	Chlorsulfuron	1	54	45
67485-29-4	Hydramethylnon	53	0	47
68359-37-5	Cyfluthrin	38	0	62
71751-41-2	Abamectin	44	2	54
72178-02-0	Fomesafen	3	47	50
77501-63-4	Lactofen	31	0	69
82657-04-3	Bifenthrin	38	0	62
88671-89-0	Myclobutanil	9	32	59
90982-32-4	Chlorimuron ethyl	1	23	76
101200-48-0	Tribenuron methyl	2	22	76
127564-92-5	Dichloropentafluoropropane	3	96	1
N010	Antimony Compounds	32	68	NA
N020	Arsenic Compounds	49	51	NA
N040	Barium Compounds	69	31	NA
N050	Beryllium Compounds	37	63	NA
N078	Cadmium Compounds	68	32	NA
N084	Chlorophenols	54	4	42
N090	Chromium Compounds (except chromite ore mined in the transvaal region)	76	24	NA
N096	Cobalt Compounds	32	68	NA
N100	Copper Compounds	72	28	NA
N106	Cyanide Compounds	2	98	0

CAS Number	Chemical Name	% of §6.1 to §:		
		8.1c	8.1d	8.7
<i>Arranged by CAS Number</i>				
N171	Ethylenebisdithiocarbamic acid, salts and esters	2	98	0
N230	Certain Glycol Ethers	0	8	92
N420	Lead Compounds	63	37	NA
N450	Manganese Compounds	39	61	NA
N458	Mercury Compounds	69	31	NA
N495	Nickel Compounds	38	62	NA
N503	Nicotine and salts	2	98	0
N511 <sup>a</sup>	Nitrate Compounds	0	10	90
N590	Polycyclic Aromatic Compounds	92	7	1
N725	Selenium Compounds	44	56	NA
N740	Silver Compounds	66	34	NA
N746	Strychnine and salts	2	98	0
N760	Thallium Compounds	54	46	NA
N770	Vanadium Compounds	32	68	NA
N874	Warfarin And Salts	3	97	0
N982	Zinc Compounds	66	34	NA
<sup>a</sup> N511: Nitrate compounds (water dissociable) are reportable only when in aqueous solution. Removal of nitrate compounds from wastewater and/or aqueous solution therefore constitutes treatment for destruction for TRI reporting purposes. Data source for nitrate removal rate is US EPA. [2012]. EPIWEB- Estimation Programs Interface Suite™ for Microsoft® Windows, v 4.11. Sewage Treatment Plant Model (STPWIN). United States Environmental Protection Agency, Washington, DC.				

# Appendix A. TRI Federal Facility Reporting Information

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## Special Instructions for TRI Federal Facility Reporting

**Important:** Please note that federal facilities must now submit TRI reports electronically using TRI-MEweb. Resources on TRI-MEweb are accessible at: <http://www2.epa.gov/toxics-release-inventory-tri-program/tri-meweb-resources>.

## A.1 Why Do Federal Facilities Need to Report?

Executive Order 13423, “Strengthening Federal Environmental Energy, and Transportation Management,” requires federal agencies to comply with the Emergency Planning and Community Right-To-Know Act of 1986 (EPCRA) and the Pollution Prevention Act of 1990 (PPA). Federal facilities have been subject to EPCRA section 313 and PPA since reporting year 1994. TRI submissions are due to EPA on July 1 of the year following each reporting (calendar) year. Reporting by the federal facility does not alter the reporting obligation of on-site contractors. Contracts entered into after the date of this order for contractor operation of government-owned facilities or vehicles require the contractor to comply with the provisions of this order with respect to such facilities or vehicles to the same extent as the agency would be required to comply if the agency operated facilities or vehicles.

For more information on Executive Order 13423, please refer to the implementing instructions which can be found on the TRI web page: <http://www2.epa.gov/toxics-release-inventory-tri-program/tri-laws-rulemakings-and-notices>

## A.2 Identifying Federal Facility Reports

Federal facility reports are identified as federal by several indicators on the form. The facility name and parent company name are critical indicators and must be reported as described below. Another critical indicator is the federal facility report box, Part I, 4.2c. Federal facilities only should check this box to indicate that the report is from a federal agency for a federal facility; federal facilities should not check the GOCO box, (Part I, Section 4.2d of the Form R). Contractors located at federal facilities (GOCOs) should check the GOCO box (Part I, Section 4.2d of the Form R); they should not check the box 4.2c. Facilities should also complete the partial or complete facility blocks (Form R page 2, block

4.2a and 4.2b) as appropriate. If you are a federal facility reporting for the first time, you should write "new" in the TRI Facility ID (TRIFID) box, even if a contractor has reported for your facility in the past. The contractor will retain the original TRIFID. You will be assigned a new TRIFID the first time you report.

## A.3 The “Double Counting” Problem

As structured, the law and the executive order require both regulated industries and the federal government to report TRI data, sometimes for the same site. In order to prevent duplicate data in the TRI database, which could result in “double counting” data for some chemicals and locations, EPA must be able to identify and distinguish the GOCO reports submitted by the federal contractor from the federal facility reports which contain data for the same site. To accomplish this, federal facility reports should be accompanied by either 1) exact electronic copies of all contractor TRI reports, including when the totals reported by the federal facility are greater than those reported by the contractor(s), or 2) a cover letter with a list of the facility contractors that submit TRI reports to EPA, identifying each contractor by name, TRI technical contact, and TRI facility name and address. Additionally, federal facilities should check Form R, Part I, Section 4.2c, while contractors at federal facilities should check Form R, Part I, Section 4.2d.

## A.4 How to Report Your Facility Name

Facility name is a critical data element. It is used by EPA to create the TRI facility ID number (TRIFID), which is a unique number designed to identify a facility site. The facility name and TRIFID number are used by all TRI data users to link data from a single site across multiple reporting years. A federal facility is assigned a new TRIFID number when the federal report is entered into the Toxics Release Inventory system for the first time. This TRIFID number, generated when the first report is entered into the Toxics Release Inventory System, will be included in future reporting packages sent to the federal facility, and should be used by the federal facility in all future reports.

Federal facilities should report their facility name in Section 4.1 as shown in the following example:

U.S. DOE Savannah River Site

It is very important that the agency name appear first, followed by the specific plant or site name.

Federal contractors at GOCO facilities should report their names as shown in the following example:

U.S. DOE Savannah River Site - Westinghouse Operations.

## A.5 How to Report Your North American Industry Classification System (NAICS) Code

Federal facilities should report the NAICS code which most closely represents the activities taking place at the site. Section A.10 lists the Public Administration NAICS codes covering executive, legislative, judicial, administrative and regulatory activities of the Federal government. Government-owned and operated business establishments are classified in major NAICS groups according to the activity in which they are engaged. For example, a Veterans Hospital would be classified in Group 806 - Hospitals.

## A.6 How to Report Your "Parent Company" Name

Federal facilities should report their parent company name on page 2 of the Form Rs (Section 5.1) by reporting their complete Department or Agency name, as shown in the following example:

U.S. Department of Energy

Block 5.2, Parent Company's Dun & Bradstreet Number, should be marked NA.

Federal contractors at GOCO facilities should not report a federal department or agency name as their parent company. A federal name in the parent company name field will classify the report as federal, and the GOCO may be identified as a non-reporter.

## A.7 How to Revise Your Data After It Has Been Submitted

Effective January 21, 2013, facilities may only revise TRI reporting forms submitted for Reporting Year 1991 through the current reporting year. Use TRI-MEweb to submit revisions to non-trade secret TRI submissions.

If you have questions about using TRI-MEweb to revise your Form R/A, please refer to the TRI-MEweb tutorial page at: <http://www2.epa.gov/toxics-release-inventory-tri-program/tri-meweb-tutorials>.

Facilities may request a revision for one or more of the following reasons:

Revision codes:

- RR1 - New Monitoring Data
- RR2 - New Emission Factor(s)
- RR3 - New Chemical Concentration Data
- RR4 - Recalculation(s)
- RR5 - Other Reason(s)

Please note that late submissions for chemicals not reported in a previous reporting year are not considered revisions for that year.

Facilities are reminded that there is a legal obligation to file an accurate and complete Form R or Form A report for each chemical by July 1 each year. EPA may take enforcement action and assess civil administrative penalties regarding corrections to errors in Form R reports that are not changes based on previously unavailable information or procedures which improve the accuracy of the data initially reported. The kinds of errors which may result in enforcement and in penalties include but are not limited to the following: (1) Errors caused by not using the most readily available information, for example, not using monitoring data collected for compliance with other regulations in calculating releases; (2) omitting a major source of emissions; (3) a mathematical or transcription or typographical error which seriously compromises the accuracy of the information, and; (4) other errors which seriously affect the utility of the data, particularly errors in release reporting for which the facility has no records showing the derivation of the release calculation, and cannot provide a sufficient explanation of the report.

### How do I revise my submission(s)?

If you plan to revise a TRI submission, you must send revised report(s) to EPA and the appropriate state or tribal agency.

You must use TRI-MEweb to submit revisions to non-trade secret TRI submissions. EPA will only accept revisions for Reporting Year 1991 through the current year.

## A.8 Who Should Sign Federal Form R Reports?

Federal Form R reports should be certified by the senior federal employee on-site. If no federal employee is on-site, federal Form R reports must be certified by the senior federal employee with management responsibility for the site. Federal Form R reports should be certified by a federal employee. Contractor employee certifications are not considered valid on federal reports.

## A.9 More Help is Available!

Federal facilities may call the EPA/TRI Information Center to ask specific questions concerning how to submit their Form R report. For contact information, see the "Contact Us" link on the TRI Home Page at <http://www.epa.gov/tri>. Additional information may also be found in the Federal Facilities guidance document at: <http://www2.epa.gov/toxics-release-inventory-tri-program/guidance-federal-facilities-revised-1999-version>.

## A.10 North American Industry Classification System Codes 921-928

### Sector 92 - Public Administration

#### 921 Executive, Legislative, and Other General Government Support

- 92111 Executive Offices
- 92112 Legislative Bodies
- 92113 Public Finance Activities
- 92114 Executive and Legislative Offices Combined
- 92115 American Indian and Alaska Native Tribal Governments
- 92119 General Government, Not Elsewhere Classified

#### 922 Justice, Public Order, and Safety Activities

- 92211 Courts
- 92212 Police Protection
- 92213 Legal Counsel and Prosecution
- 92214 Correctional Institutions
- 92215 Parole Offices and Probation Offices
- 92216 Fire Protection
- 92219 Other Justice, Public Order and Safety Activities

#### 923 Administration of Human Resource Programs

- 92311 Administration of Educational Programs
- 92312 Administration of Public Health Programs
- 92313 Administration of Human Resource Programs (Except Education, Public Health, and Veterans' Affairs Programs)
- 92314 Administration of Veterans Affairs

#### 924 Administration of Environmental Quality Programs

- 92411 Administration of Air and Water Resource and Solid Waste Management Programs
- 92412 Administration of Conservation Programs

#### 925 Administration of Housing Programs, Urban Planning, and Community Development

- 92511 Administration of Housing Programs
- 92512 Administration of Urban Planning and Community and Rural Development

#### 926 Administration of Economic Programs

- 92611 Administration of General Economic Programs
- 92612 Regulation and Administration of Transportation Programs
- 92613 Regulation and Administration of Communications, Electric, Gas, and Other Utilities
- 92614 Regulation of Agricultural Marketing and Commodities
- 92615 Regulation, Licensing, and Inspection of Miscellaneous Commercial Sectors

#### 927 Space Research and Technology

- 92711 Space Research and Technology

#### 928 National Security and International Affairs

- 92811 National Security
- 92812 International Affairs

# Appendix B. Reporting Codes for EPA Form R and Instructions for Reporting Metals

## B.1 Form R Part II

### Revision Codes:

RR1	New Monitoring Data
RR2	New Emission Factor(s)
RR3	New Chemical Concentration Data
RR4	Recalculation(s)
RR5	Other Reason(s)

### Withdrawal Codes:

WT1	Did not meet the reporting threshold for manufacturing, processing, or otherwise use
WT2	Did not meet the reporting threshold for number of employees
WT3	Not in a covered NAICS Code
WO1	Other reason(s)

### Section 1.1. CAS Number

### EPCRA Section 313 Chemical Category Codes

N010	Antimony compounds
N020	Arsenic compounds
N040	Barium compounds
N050	Beryllium compounds
N078	Cadmium compounds
N084	Chlorophenols
N090	Chromium compounds
N096	Cobalt compounds
N100	Copper compounds
N106	Cyanide compounds
N120	Diisocyanates
N150	Dioxin and dioxin-like compounds
	N171 Ethylenebisdithiocarbamic acid, salts and esters (EBDCs)
N230	Certain glycol ethers
N420	Lead compounds
N450	Manganese compounds
N458	Mercury compounds
N495	Nickel compounds
N503	Nicotine and salts
N511	Nitrate compounds
N575	Polybrominated biphenyls (PBBs)
N583	Polychlorinated alkanes
N590	Polycyclic aromatic compounds
N725	Selenium compounds
N740	Silver compounds
N746	Strychnine and salts
N760	Thallium compounds
N770	Vanadium compounds

N874 Warfarin and salts

N982 Zinc compounds

### Section 4. Maximum Amount of the Toxic Chemical On-Site at Any Time During the Calendar Year

	<i>Range(pounds)</i>	
<u>Range Code</u>	<u>From</u>	<u>To</u>
01	0	99
02	100	999
03	1,000	9,999
04	10,000	99,999
05	100,000	999,999
06	1,000,000	9,999,999
07	10,000,000	49,999,999
08	50,000,000	99,999,999
09	100,000,000	499,999,999
10	500,000,000	999,999,999
11	1 billion	more than 1 billion

### Section 5. Quantity of the Non-PBT Chemical Entering Each Environmental Medium On-site and Section 6. Transfers of the Toxic Chemical in Wastes to Off-Site Locations

	<i>Total Release or Transfer</i>	
<u>Code</u>	<u>Range (pounds)</u>	
A	1-10	
B	11-499	
C	500-999	

### Basis of Estimate

M1-	Estimate is based on continuous monitoring data or measurements for the EPCRA section 313 chemical.
M2-	Estimate is based on periodic or random monitoring data or measurements for the EPCRA section 313 chemical.
C-	Estimate is based on mass balance calculations, such as calculation of the amount of the EPCRA section 313 chemical in streams entering and leaving process equipment.

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- E1- Estimate is based on published emission factors, such as those relating release quantity to through-put or equipment type (e.g., air emission factors).
- E2- Estimate is based on site specific emission factors, such as those relating release quantity to through-put or equipment type (e.g., air emission factors).
- O- Estimate is based on other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgment. This would include applying an estimated removal efficiency to a waste stream, even if the composition of the stream before treatment was fully identified through monitoring data.

### Section 6. Transfers of the Toxic Chemical in Wastes to Off-Site Locations

#### Type of Waste Disposal/Treatment/Energy Recovery/Recycling

- M10 Storage Only
- M20 Solvents/Organics Recovery
- M24 Metals Recovery
- M26 Other Reuse or Recovery
- M28 Acid Regeneration
- M40 Solidification/Stabilization
- M41 Solidification/Stabilization-Metals and Metal Category Compounds only
- M50 Incineration/Thermal Treatment
- M54 Incineration/Insignificant Fuel Value
- M56 Energy Recovery
- M61 Wastewater Treatment (Excluding POTW)
- M62 Wastewater Treatment (Excluding POTW) - Metals and Metal Category Compounds only
- M64 Other Landfills
- M65 RCRA Subtitle C Landfills
- M66 Subtitle C Surface Impoundment
- M67 Other Surface Impoundments
- M69 Other Waste Treatment
- M73 Land Treatment
- M79 Other Land Disposal
- M81 Underground Injection to Class I Wells
- M82 Underground Injection to Class II-V Wells
- M90 Other Off-Site Management
- M92 Transfer to Waste Broker - Energy Recovery
- M93 Transfer to Waste Broker - Recycling
- M94 Transfer to Waste Broker - Disposal
- M95 Transfer to Waste Broker - Waste Treatment
- M99 Unknown

### Section 7A. On-Site Waste Treatment Methods and Efficiency

#### General Waste Stream

- A Gaseous (gases, vapors, airborne particulates)
- W Wastewater (aqueous waste)
- L Liquid waste streams (non-aqueous waste)
- S Solid waste streams (including sludges and slurries)

#### Waste Treatment Methods

##### Air Emissions Treatment

- A01 Flare
- A02 Condenser
- A03 Scrubber
- A04 Absorber
- A05 Electrostatic Precipitator
- A06 Mechanical Separation
- A07 Other Air Emission Treatment

##### Chemical Treatment

- H040 Incineration--thermal destruction other than use as a fuel
- H071 Chemical reduction with or without precipitation
- H073 Cyanide destruction with or without precipitation
- H075 Chemical oxidation
- H076 Wet air oxidation
- H077 Other chemical precipitation with or without pre-treatment

##### Biological Treatment

- H081 Biological treatment with or without precipitation

##### Physical Treatment

- H082 Adsorption
- H083 Air or steam stripping
- H101 Sludge treatment and/or dewatering
- H103 Absorption
- H111 Stabilization or chemical fixation prior to disposal
- H112 Macro-encapsulation prior to disposal
- H121 Neutralization
- H122 Evaporation
- H123 Settling or clarification
- H124 Phase separation
- H129 Other treatment

### Section 7B. On-Site Energy Recovery Processes

- U01 Industrial Kiln
- U02 Industrial Furnace

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U03 Industrial Boiler

### Section 7C. On-Site Recycling Processes

H10 Metal recovery (by retorting, smelting, or chemical or physical extraction)  
H20 Solvent recovery (including distillation, evaporation, fractionation or extraction)  
H39 Other recovery or reclamation for reuse (including acid regeneration or other chemical reaction process)

### Section 8.10. Source Reduction Activity Codes

#### Good Operating Practices

W13 Improved maintenance scheduling, record keeping, or procedures  
W14 Changed production schedule to minimize equipment and feedstock changeovers  
W15 Introduced in-line product quality monitoring or other process analysis system  
W19 Other changes in operating practices

#### Inventory Control

W21 Instituted procedures to ensure that materials do not stay in inventory beyond shelf-life  
W22 Began to test outdated material - continue to use if still effective  
W23 Eliminated shelf-life requirements for stable materials  
W24 Instituted better labeling procedures  
W25 Instituted clearinghouse to exchange materials that would otherwise be discarded  
W29 Other changes in inventory control

#### Spill and Leak Prevention

W31 Improved storage or stacking procedures  
W32 Improved procedures for loading, unloading, and transfer operations  
W33 Installed overflow alarms or automatic shut-off valves  
W35 Installed vapor recovery systems  
W36 Implemented inspection or monitoring program of potential spill or leak sources  
W39 Other changes made in spill and leak prevention

#### Raw Material Modifications

W41 Increased purity of raw materials  
W42 Substituted raw materials  
W43 Substituted a feedstock or reagent chemical with a different chemical  
W49 Other raw material modifications made

#### Process Modifications

W50 Optimized reaction conditions or otherwise increased efficiency of synthesis

W51 Instituted recirculation within a process  
W52 Modified equipment, layout, or piping  
W53 Use of a different process catalyst  
W54 Instituted better controls on operating bulk containers to minimize discarding of empty containers  
W55 Changed from small volume containers to bulk containers to minimize discarding of empty containers  
W56 Reduced or eliminated use of an organic solvent  
W57 Used biotechnology in manufacturing process  
W58 Other process modifications

#### Cleaning and Degreasing

W59 Modified stripping/cleaning equipment  
W60 Changed to mechanical stripping/cleaning devices (from solvents or other materials)  
W61 Changed to aqueous cleaners (from solvents or other materials)  
W63 Modified containment procedures for cleaning units  
W64 Improved draining procedures  
W65 Redesigned parts racks to reduce drag out  
W66 Modified or installed rinse systems  
W67 Improved rinse equipment design  
W68 Improved rinse equipment operation  
W71 Other cleaning and degreasing modifications

#### Surface Preparation and Finishing

W72 Modified spray systems or equipment  
W73 Substituted coating materials used  
W74 Improved application techniques  
W75 Changed from spray to other system  
W78 Other surface preparation and finishing modifications

#### Product Modifications

W81 Changed product specifications  
W82 Modified design or composition of products  
W83 Modified packaging  
W84 Developed a new chemical product to replace a previous chemical product  
W89 Other product modifications

### Section 8.10. Methods Used to Identify Source Reduction Activities

For each source reduction activity, enter up to three of the following codes that correspond to the method(s) which contributed most to the decision to implement that activity.

T01 Internal Pollution Prevention Opportunity Audit(s)

*Appendix B*

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T02	External Pollution Prevention Opportunity Audit(s)	T07	State Government Technical Assistance Program
T03	Materials Balance Audits	T08	Federal Government Technical Assistance Program
T04	Participative Team Management	T09	Trade Association/Industry Technical Assistance Program
T05	Employee Recommendation (independent of a formal company program)	T10	Vendor Assistance
T06	Employee Recommendation (under a formal company program)	T11	Other



## B.2 Reporting the Waste Management of Metals

This appendix outlines how the TRI-MEweb reporting software restricts reporting for metals when the specific data element or waste management code is not applicable for a particular chemical. Below is a list of metals divided into four groups along with charts that help explain where quantities of these chemicals can and cannot be reported on the Form R using TRI-MEweb. In addition, there are charts that explain restrictions on reporting waste management codes for the toxic chemicals in each of the four groups. This appendix only shows where reporting is restricted in TRI-MEweb, it does not indicate every situation where a metal should not be reported in a specific section of the form. For example, TRI-MEweb does not restrict the reporting of most individually-listed metal compounds as used for energy recovery (Sections 8.2 and 8.3) even though some of these chemicals do not have a heat value greater than 5000 British thermal units (Btu) and, thus, cannot be combusted for energy recovery. It is left to the facility to decide which of these toxic chemicals can be used for energy recovery. If you are not using TRI-MEweb this appendix can serve as a guide to help you understand where it is not appropriate to report certain quantities of toxic chemicals or waste management codes on your Form R.

### Parent Metals:

Antimony  
Arsenic  
Barium  
Beryllium  
Cadmium  
Chromium  
Cobalt  
Copper  
Lead  
Manganese  
Mercury  
Nickel  
Selenium  
Silver  
Thallium

### Metal Compound Categories:

Antimony Compounds  
Arsenic Compounds  
Barium Compounds  
Beryllium Compounds  
Cadmium Compounds  
Chromium Compounds  
Cobalt Compounds  
Copper Compounds  
Lead Compounds  
Manganese Compounds  
Mercury Compounds  
Nickel Compounds  
Selenium Compounds  
Silver Compounds  
Thallium Compounds  
Vanadium Compounds  
Zinc Compounds

### Metals with Qualifiers:

Aluminum (fume or dust)  
Vanadium (except when in an alloy)  
Zinc (fume or dust)

### Individually-Listed Metal Compounds:

Bis(tributyltin) oxide  
Triphenyltin hydroxide  
Triphenyltin chloride  
Molybdenum trioxide  
Thorium dioxide  
Asbestos (friable)  
Aluminum oxide (fibrous forms)  
Tributyltin fluoride

Tributyltin methacrylate  
Titanium tetrachloride  
Boron trifluoride  
Metiram  
Boron trichloride  
Zineb  
Maneb  
Fenbutatin oxide  
Iron pentacarbonyl  
Ferbam  
C.I. Direct Brown 95  
Osmium tetroxide  
Aluminum phosphide  
C.I. Direct Blue 218

### Sections 5.3 - Discharges to Water and 6.1 - Transfers to POTWs

The following chart indicates which metals can be reported as released to water in Section 5.3 or to POTW's in Section 6.1. Only zinc (fume or dust) and aluminum (fume or dust) are not reported in these sections because the fume or dust form of a toxic chemical cannot exist in water.

Form R Section in Part II	Parent Metals	Metal Category Compounds	Metals with Qualifiers	Individually-listed Metal Compounds
Section 5.3 - Discharges to receiving streams or water bodies	All	All	Vanadium (except when contained in an alloy)	All except Asbestos
Section 6.1- Discharges to POTWs	All	All	Vanadium (except when contained in an alloy)	All except Asbestos

## Appendix B

### Section 6.2. Transfers to Other Off-Site Locations

Any toxic chemical may be reported in Section 6.2. However, TRI-MEweb will not allow certain M codes to be used when reporting metals. The chart below indicates which M codes can be reported in Section 6.2 for the four groups of metals. Note that all disposal M codes other than M41 and M62 can be used for all toxic chemicals. Code M24 is only made available for the four groups of metals.

Waste Management Code for Section 6.2	Parent Metals	Metal Category Compounds	Metals with Qualifiers	Individually-listed Metal Compounds
M41 and M62 (disposal codes-for metals only)	All	All	Vanadium (except when contained in an alloy)	All except Asbestos
M56 and M92 (energy recovery codes)	None	None	None	All except Asbestos <sup>1</sup>
M20 and M28 (recycling codes)	None	None	None	All
M24, M26 and M93 (recycling codes)	All	All	All	All
M40, M50, M54, (treatment codes)	None	None	All except Vanadium (except when contained in an alloy)	All
M61, M69, M95 (treatment codes)	Barium <sup>2</sup>	Barium Compounds <sup>2</sup>	Same as above	All

### Section 7A. On-site Waste Treatment Methods and Efficiency

TRI-MEweb allows any toxic chemical to be reported in Section 7A, however, it limits reporting in two ways. First, TRI-MEweb limits the treatment codes that can be reported based on the General Waste Stream Code selected. If a TRI-MEweb user selects General Waste Stream code "A – Gaseous", all Waste Treatment Codes are made available. However, if a user selects from the remaining three General Waste Stream Codes (W - Wastewater, L - Liquid waste streams, or S - Solid waste streams), the "Air Emissions Treatment" Waste Treatment Codes are not made available. Second, the software restricts reporting for certain toxic chemicals with qualifiers. When reporting zinc (fume or dust) or aluminum (fume or dust) TRI-MEweb will not allow the user to select General Waste Stream Codes W-Wastewater and L-Liquid waste streams because the fume or dust form of a toxic chemical cannot exist in a liquid or water waste. For asbestos (friable) only S - Solid or A - Gaseous can be selected. When reporting hydrochloric acid (acid aerosols) or sulfuric acid (acid aerosols) only A - Gaseous can be selected.

### Crosswalk for Section 7A, Column B. Waste Treatment Method (s) Sequence

Air Emissions Treatment (applicable to gaseous waste streams only) (No change — same as previous codes)			
A01	Flare		
A02	Condenser		
A03	Scrubber		
A04	Absorber		
A05	Electrostatic Precipitator		
A06	Mechanical Separation		
A07	Other Air Emission Treatment		

**Appendix B**

<b>Biological Treatment:</b>			
<b>Previous Codes</b>		<b>New Codes (adapted from RCRA Hazardous Waste Management Codes)</b>	
B11	Aerobic	H081	Biological treatment with or without precipitation
B21	Anaerobic	H081	Biological treatment with or without precipitation
B31	Facultative	H081	Biological treatment with or without precipitation
B99	Other Biological Treatment	H081	Biological treatment with or without precipitation

<b>Chemical Treatment:</b>			
<b>Previous Codes</b>		<b>New Codes (adapted from RCRA Hazardous Waste Management Codes)</b>	
C01	Chemical Precipitation B Lime or Sodium Hydroxide	H071	Chemical reduction with or without precipitation
C02	Chemical Precipitation B Sulfide	H071	Chemical reduction with or without precipitation
C09	Chemical Precipitation B Other	H077	Other chemical precipitation with or without pre-treatment
C11	Neutralization	H121	Neutralization
C21	Chromium Reduction	H071	Chemical reduction with or without precipitation
C31	Complexed Metals Treatment (other than pH adjustment)	H129	Other treatment
C41	Cyanide Oxidation B Alkaline Chlorination	H073	Cyanide destruction with or without precipitation
C42	Cyanide Oxidation B Electrochemical	H073	Cyanide destruction with or without precipitation
C43	Cyanide Oxidation B Other	H073	Cyanide destruction with or without precipitation
C44	General Oxidation (including Disinfection) B Chlorination	H075	Chemical oxidation
C45	General Oxidation (including Disinfection) B Ozonation	H075	Chemical oxidation
C46	General Oxidation (including Disinfection) B Other	H075	Chemical oxidation
C99	Other Chemical Treatment	H129	Other treatment

**Appendix B**

<b>Chemical Treatment:</b>			
<b>Previous Codes</b>		<b>New Codes (adapted from RCRA Hazardous Waste Management Codes)</b>	
Incineration/Thermal Treatment: (Note: Only report combustion for the purposes of incineration/thermal treatment in Section 7A. If the method involves combustion for the purposes of energy recover, report as U01, U02, or U03 in Section 7B. If the method involves combustion for the purposes of materials recovery, report as H39 in Section 7C.)			
F01	Liquid Injection	H040	Incineration B thermal destruction other than use as a fuel
F11	Rotary Kiln with Liquid Injection Unit	H040	Incineration B thermal destruction other than use as a fuel
F19	Other Rotary Kiln	H040	Incineration B thermal destruction other than use as a fuel
F31	Two Stage	H040	Incineration B thermal destruction other than use as a fuel
F41	Fixed Hearth	H040	Incineration B thermal destruction other than use as a fuel
F42	Multiple Hearth	H040	Incineration B thermal destruction other than use as a fuel
F51	Fluidized Bed	H040	Incineration B thermal destruction other than use as a fuel
F61	Infra-Red	H040	Incineration B thermal destruction other than use as a fuel
F71	Fume/Vapor	H040	Incineration B thermal destruction other than use as a fuel
F81	Pyrolytic destructor	H040	Incineration B thermal destruction other than use as a fuel
F82	Wet air oxidation	H076	Wet air oxidation
F83	Thermal Drying/Dewatering	H122	Evaporation
F99	Other Incineration/Thermal Treatment	H040	Incineration B thermal destruction other than use as a fuel

<b>Physical Treatment:</b>			
<b>Previous Codes</b>		<b>New Codes (adapted from RCRA Hazardous Waste Management Codes)</b>	
P01	Equalization	H129	Other treatment
P09	Other blending	H129	other treatment
P11	Settling/clarification	H123	Settling or clarification
P12	Filtration	H123	Settling or clarification
P13	Sludge dewatering (non-thermal)	H101	Sludge treatment and/or dewatering
P14	Air flotation	H124	Phase separation
P15	Oil skimming	H124	Phase separation
P16	Emulsion breaking B thermal	H124	Phase separation
P17	Emulsion breaking B chemical	H124	Phase separation
P18	Emulsion breaking B other	H124	Phase separation

## Appendix B

<b>Physical Treatment:</b>			
<b>Previous Codes</b>		<b>New Codes (adapted from RCRA Hazardous Waste Management Codes)</b>	
P19	Other liquid phase separation	H124	Phase separation
P21	Adsorption B Carbon	H082	Adsorption
P22	Adsorption B Ion exchange (other than for recovery/reuse)	H082	Adsorption
P23	Adsorption B Resin	H082	Adsorption
P29	Adsorption B Other	H082	Adsorption
P31	Reverse Osmosis (other than for recover/reuse)	H129	Other treatment
P41	Stripping B Air	H083	Air or steam stripping
P42	Stripping B Steam	H083	Air or steam stripping
P49	Stripping B Other	H083	Air or steam stripping
P51	Acid Leaching (other than for recovery/reuse)	H129	Other treatment
P61	Solvent Extraction (other than recovery/reuse)	H129	Other treatment
P99	Other Physical Treatment	H129	Other treatment

<b>Solidification/Stabilization:</b>			
<b>Previous Codes</b>		<b>New Codes (adapted from RCRA Hazardous Waste Management Codes)</b>	
G01	Cement processes (including silicates)	H111	Stabilization or chemical fixation prior to disposal
G09	Other Pozzolonic Processes (including silicates)	H111	Stabilization or chemical fixation prior to disposal
G11	Asphaltic Techniques	H111	Stabilization or chemical fixation prior to disposal
G20	Thermoplastic Techniques	H111	Stabilization or chemical fixation prior to disposal
G99	Other Solidification Processes	H111	Stabilization or chemical fixation prior to disposal

### Section 7B. On-site Energy Recovery Processes

The chart below indicates which energy recovery codes can be reported in TRI-MEweb in Section 7B for the four groups of metals.

<b>Energy Recovery Code for Section 7B</b>	<b>Parent Metals</b>	<b>Metal Category Compounds</b>	<b>Metals with Qualifiers</b>	<b>Individually-listed Metal Compounds</b>
U01, U02, U03	None	None	None	All except Asbestos <sup>1</sup>

## Appendix B

### Section 7C. On-site Recycling Processes

Any chemical can be reported in Section 7C. However, certain waste management codes should not be reported for certain toxic chemicals. The chart below indicates which codes can be reported in Section 7C when using TRI-MEweb.

Recycling Code for Section 7C	Parent Metals	Metal Category Compounds	Metals with Qualifiers	Individually-listed Metal Compounds
H10 (this code is for metals only)	All	All	All	All
H20	None	None	None	All
H39	All	All	All	All

### Crosswalk for Section 7C. On-site Recycling Processes

Previous Codes		New Codes (adapted from RCRA Hazardous Waste Management Codes)	
R11	Solvents/Organics Recovery B Batch Still Distillation	H20	Solvent Recovery (including distillation, evaporation, fractionation or extraction)
R12	Solvents/Organics Recovery B Thin-Film Evaporation	H20	Solvent Recovery (including distillation, evaporation, fractionation or extraction)
R13	Solvents/Organics Recovery B Fractionation	H20	Solvent Recovery (including distillation, evaporation, fractionation or extraction)
R14	Solvents/Organics Recovery B Solvent Extraction	H20	Solvent Recovery (including distillation, evaporation, fractionation or extraction)
R19	Solvents/Organics Recovery B Other	H20	Solvent Recovery (including distillation, evaporation, fractionation or extraction)
R21	Metals Recovery B Electrolytic	H10	Metal Recovery (by retorting, smelting, or chemical or physical extraction)
R22	Metals Recovery B Ion Exchange	H10	Metal Recovery (by retorting, smelting, or chemical or physical extraction)
R23	Metals Recovery B Acid Leaching	H10	Metal Recovery (by retorting, smelting, or chemical or physical extraction)
R24	Metals Recovery B Reverse Osmosis	H10	Metal Recovery (by retorting, smelting, or chemical or physical extraction)
R26	Metals Recovery B Solvent Extraction	H10	Metal Recovery (by retorting, smelting, or chemical or physical extraction)
R27	Metals Recovery B High Temperature	H10	Metal Recovery (by retorting, smelting, or chemical or physical extraction)

## Appendix B

Previous Codes		New Codes (adapted from RCRA Hazardous Waste Management Codes)	
R28	Metals Recovery B Retorting	H10	Metal Recovery (by retorting, smelting, or chemical or physical extraction)
R29	Metals Recovery B Secondary Smelting	H10	Metal Recovery (by retorting, smelting, or chemical or physical extraction)
R30	Metals Recovery B Other	H10	Metal Recovery (by retorting, smelting, or chemical or physical extraction)
R40	Acid Regeneration	H39	Other recovery or reclamation for reuse (including acid regeneration or other chemical reaction process)
R99	Other Reuse or Recovery	H39	Other recovery or reclamation for reuse (including acid regeneration or other chemical reaction process)

### Section 8. Source Reduction and Recycling Activities

The chart below indicates which metals can be reported in Sections 8.2, 8.3, 8.6 and 8.7 of the Form R when using *TRI-MEweb*. Note that all toxic chemicals can be reported in Sections 8.1, 8.4, 8.5 and 8.8.

Waste Management Activity	Parent Metals	Metal Category Compounds	Metals with Qualifiers	Individually-listed Metal Compounds
Quantity used for energy recovery on site and off site (Sections 8.2 and 8.3)	None	None	None	All except Asbestos <sup>2</sup>
Quantity treated for destruction on site and off site (Sections 8.6 and 8.7)	None except Barium <sup>2</sup>	None except Barium Compounds <sup>2</sup>	All except Vanadium (except when contained in an alloy)	All

<sup>1</sup> Although TRI-MEweb does not restrict reporting of most individually-listed metal compounds as transferred off site for energy recovery, only chemicals with a heat value greater than 5000 British thermal units that are combusted in a device that is an industrial furnace or boiler (40 CFR Section 372.3) should be reported as used for energy recovery.

<sup>2</sup> The toxic chemical category barium compounds (N040) does not include barium sulfate. Because barium sulfate is not a listed toxic chemical, the conversion in a waste stream of barium or barium compound to barium sulfate is considered treatment for destruction (40 CFR Section 372.3).

# Appendix C. Electronic Facility Data Profiles and Common Errors in Completing Form R Reports and Form A Certification Statements

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It is important that facilities submit required TRI chemical submissions in a timely manner for inclusion in the TRI national database, annual public data release (TRI National Analysis), and other information products. All submitted data should be complete and accurate. This appendix provides an overview of the Electronic Facility Data Profile (eFDP), an important document that EPA uses as a receipt to our reporting facilities to ensure consistent, complete, and accurate submissions. This appendix also provides specific guidance to avoid common errors in completing Form Rs and Form A Certification Statements, including errors in threshold determination, misapplication of exemptions, and activities involving a reportable chemical, any of which may result in the erroneous non-reporting of a chemical.

Facilities must use the TRI-MEweb online reporting application to submit non-trade secret TRI reports. TRI-MEweb assists facilities to report TRI data by importing prior year TRI form data into current year forms to expedite reporting, validating reports to ensure higher data quality, and providing instant receipt confirmation of submissions.

You must use TRI-MEweb to submit revisions to non-trade secret TRI submissions. EPA will only accept revisions for Reporting Year 1991 through the current year. If you have questions about using TRI-MEweb to revise your Form R/A, please refer to the TRI-MEweb *tutorial* page at: [http://www.epa.gov/tri/reporting\\_materials/tutorials/tutorial\\_index.html](http://www.epa.gov/tri/reporting_materials/tutorials/tutorial_index.html).

## Electronic Facility Data Profile (eFDP)

The eFDP report is made available via TRI-MEweb to reporting facilities in response to any submission processed into the EPA database. If the technical contact, preparer or certifying official provided an email address in the Form R/Form A, they will receive a real-time email notifying them when their eFDP has been updated. The email will contain information explaining how to create a CDX user account and how to add the TRI-MEweb application.

Reporting facility officials may confirm and review their submitted TRI data to EPA by viewing their electronic Facility Data Profile (eFDP) on the Internet by logging into their CDX account and clicking the *TRI-MEweb: TRI Made Easy Web* link from their MyCDX page. This will open the “Welcome” page of the TRI-MEweb application. On the “Welcome” page, they can follow the instructions for viewing the eFDP. It is very important to review your eFDP report carefully. Your reporting facility may have incorrectly entered an incorrect waste quantity in your TRI-MEweb submission, or incorrectly listed the chemical category. Reviewing the eFDP allows reporting facilities to

conduct final checks of the data submitted to EPA before it is released to the public. If you have questions regarding your eFDP, please send an email to [helpdesk@epacdx.net](mailto:helpdesk@epacdx.net) or call 1 (888) 890-1955.

An eFDP report is comprised of the following sections:

**Facility Information.** This section displays all facility-specific data, including TRI Facility Identification (TRIFID), facility name, facility address, facility mailing address, North American Industry Classification System code (NAICS), and other facility data. Errors related to facility information will be marked in this section.

**Instructions Page.** This page provides instructions on how to review and respond to the eFDP.

**Chemical Report Summary.** This section lists all chemicals reported by the facility for each reporting year covered by the eFDP. For example, if the eFDP is responding to five original chemical submissions for Reporting Year 2013 and revisions to one chemical for Reporting Year 2011, a list of all chemicals reported for both years will appear.

**Errors/Alerts Identified In This Report: Non-Technical Data Changes (NDC), Notices of Technical Errors (NOTE), Notices of Significant Error (NOSE), and Data Quality Alerts (DQA).** eFDPs identify three different types of errors: NDCs, NOTES and NOSEs and one type of alert called Data Quality Alert (DQA). See explanations in Section B.

**Error Summary Page.** The Error Summary Page provides facilities an error/alert count for each chemical submission.

**Chemical Reports.** All recently submitted and processed Form R or Form A data (i.e., chemical specific data) are displayed in the chemical reports under the appropriate facility or subordinate facility names. The eFDP report displays facsimiles for chemical reports for submissions received during the current calendar year and revisions or responses to eFDPs only. For example, if a facility originally reported five chemicals for Reporting Year 2012, and subsequently revises only one chemical submission, the facility will receive an eFDP for Reporting Year 2012 with only the revised chemical included in the Chemical Reports section. As a result, there may be fewer chemical reports than chemicals listed in the Chemical Summary section. If only facility level changes have occurred (i.e., Part I of the Form R or A), this section is not provided.



**Data Quality Alerts.** TRI provides Data Quality Alerts (DQAs) in eFDP reports. The DQA informs facilities of possible reporting errors by flagging data trends that are outside the norm. For example, if a facility reports a change in the release of a chemical that is over 25% compared to the previous year, a DQA will be triggered. This will assist facilities in reporting accurate information.

## C.1 Levels of Errors Identified in eFDPs: Notice of Non-Technical Data Change (NDC), Notice of Technical Errors (NOTE), Notice of Significant Errors (NOSE), Notice of Noncompliance (NON)

**eFDP Error Reporting.** In addition to echoing back the information a facility has submitted, eFDPs are used to identify potential errors and provide Data Quality Alerts. Errors are still possible on forms submitted through TRI-MEweb and this appendix will indicate whether specific errors can occur on paper forms or TRI-MEweb submissions or both.

As submission information is entered into EPA's national database, a series of automated data quality checks are performed. Some error messages will indicate where the TRI Data Processing Center has made minor clerical changes to submissions. The data quality checks are useful to identify potential errors with certain data fields such as TRI Facility Identification, facility name, county spelling, as well as to perform validation checks to ensure consistency among data elements within a given Form R or Form A. These data quality checks, however, cannot detect whether release, transfer, or waste management quantities were calculated or entered accurately.

Within an eFDP report, there may be up to three different types of errors identified.

### Non-Technical Data Change (NDC)

**Applies to:** Paper forms only (trade secret submissions)

A Non-Technical Data Change (NDC) notifies you of simple, clerical errors that the TRI Data Processing Center has corrected for you. It is not necessary to respond to a NDC. The TRI Data Processing Center will correct simple, clerical errors that are not technical or scientific - a "**non-technical data change**." For example, if a facility transposes CAS numbers (e.g., the submitter lists 7623-00-0 for sodium nitrite instead of 7632-00-0), the TRI Data Processing Center will correct this clerical error and display the correct information on the facility's eFDP. If a facility

lists a specific glycol ethers subcategory, the TRI Data Processing Center will replace this subcategory with the reportable name "certain glycol ethers." The messages used on eFDPs to report non-technical data changes are shown at the end of this appendix under the heading "C.5 Messages Used to Report Notices of Technical Errors (NOTEs) and Non-technical Data Changes (NDCs)." This type of error is flagged for correction during data entry when using TRI-MEweb and needs to be addressed by the facility before the submission is submitted and processed by EPA. Therefore, NDCs are not possible in a TRI-MEweb submission.

### Notice of Technical Error (NOTE)

**Applies to:** Paper forms (trade secret submissions) and TRI-MEweb submissions for RYs 1991 – 2004

A Notice of Technical Error (NOTE) highlights inconsistencies or miscalculations that may distort your facility's information in EPA's public data products or skew analyses. Incomplete addresses, no technical or public contact provided, missing or invalid NAICS codes, or the use of range codes to report PBT chemical releases are all examples of technical errors.

If you agree that an error exists then you should submit a revised Form R or Form A. Depending upon when your changes are received, there may or may not be sufficient time to incorporate them into EPA's database before your report has been released to the public. Technical errors do not prevent submissions from being entered into the data management system, but indicate inconsistencies or miscalculations in the submitted form. These errors can distort public information products and skew any analyses if not corrected. The messages used on eFDPs to report NOTEs are shown below at the end of this appendix under the heading "C.5 Messages Used to Report Notices of Technical Errors (NOTEs) and Non-technical Data Changes (NDCs)."

### Notices of Significant Errors (NOSE)

**Applies to:** Paper forms (trade secret submissions) and TRI-MEweb submissions

The most serious errors are classified as Notices of Significant Errors (NOSE). The eFDP contains the Notice of Significant Error if applicable. Significant errors prevent submissions from being entered into the TRI Data Processing Center data management system or do not allow the TRI Data Processing Center to verify the authenticity of the submission. Invalid forms, missing pages, no chemical name or CAS number are examples of significant errors. These types of errors can be corrected by the reporting facility submitting a revised Form R or Form A, or the reporting facility can provide the TRI Data Processing Center with a brief explanation why they do not believe that it is an error. A facility must respond to a Notice of Significant Error within 21 days of receipt. Failure to respond within the initial 21-day requirement may result in the issuance of a Notice of Noncompliance (NON). A

Notice of Noncompliance is not included in an eFDP and is mailed separately.

### **Notice of Noncompliance (NON)**

**Applies to:** Paper forms (trade secret submissions) and TRI-MEweb submissions

The Agency will issue a **Notice of Noncompliance (NON)** to a facility for failure to respond to a Notice of Significant Error (NOSE) within the required period. A NON suggests that a facility should take corrective action within 30 days and respond to the Agency that corrective action has been taken. If a facility fails to respond to the NON within the required time period, the Agency may take further action.

### **Record Keeping**

Facilities must keep copies, for three years, of submitted Form R reports and Form A certification statements and all documentation used to complete their submissions in accordance with 40 CFR 372.10. This documentation should include threshold determination calculations, the basis of exemptions applied, and the estimation techniques and data used for all quantities reported on the Form R and Form A. Using TRI-MEweb, facilities may access submitted chemical release data back to RY 1991. Facilities may print this data for their records.

## **C.2 Common Errors in Completing Form R Reports and Form A Certification Statements**

The following section lists the most common errors that reporting facilities have encountered when submitting TRI reports to EPA. TRI-MEweb will not allow many of these errors to be reported, except in instances where facilities are revising forms from Reporting Years prior to RY2005. Some of these errors are not detected nor listed on an eFDP report. Errors that are not detectable are hard to evaluate by EPA because they could be valid submissions and can only be determined to be incorrect by the reporting facility. Reporting facilities should review their reports for common errors before submitting them to EPA.

### **Threshold Determinations**

**Calculating threshold determinations.** Annual quantities manufactured, processed, or otherwise used for section 313 chemicals must be calculated, not surmised. The assumption that thresholds are exceeded commonly leads to error. This error type is not detected nor listed on an eFDP report.

**Misclassification of EPCRA section 313 chemical activity.** Failure to correctly classify an EPCRA section 313 chemical activity may result in an incorrect threshold determination. As a result, a facility may fail to submit the required Form R.

This error type is not detected nor listed on an eFDP report.

### **EPCRA section 313 chemical activity overlooked.**

Many facilities believe that because the section 313 reporting requirement pertains to manufacturers, only the use of EPCRA section 313 chemicals in manufacturing processes must be examined. *Any activity* involving the manufacture, process, or otherwise use of an EPCRA section 313 chemical or chemical category must be included in threshold determinations. Commonly overlooked activities include importation of chemicals, generation of waste byproducts, processing of naturally occurring metals and metal category compounds in ore, manufacturing and processing intermediates, the use of chemicals for cleaning of equipment, and the generation of byproducts during combustion of coal and/or oil. Facilities should take a systematic approach to identify all chemicals and mixtures used in production and non-production capacities, including catalysts, well treatment chemicals, and wastewater treatment chemicals. This error type is not detected nor listed on an eFDP report.

### **Considering EPCRA section 313 chemicals in mixtures and other trade name products.**

EPCRA section 313 chemicals contained in mixtures (including ores and stainless steel alloys) and other trade name products must be factored into threshold determinations and release and other waste management determinations, provided that the *de minimis* exemption cannot be taken. When the EPCRA section 313 chemical being reported is a component in a mixture or other trade name product, report only the weight of the EPCRA section 313 chemical in the mixture. Refer to Section B.4f of this document to calculate the weight of an EPCRA section 313 chemical in a mixture or other trade name product. This error type is not detected nor listed on an eFDP report.

**Overlooking manufacturing.** Coincidental manufacturing must not be overlooked. If coal and/or fuel oil and other raw materials that contain EPCRA section 313 chemicals are used in boilers/burners, there is a potential for the coincidental manufacture of EPCRA section 313 chemicals such as sulfuric acid (acid aerosols), hydrochloric acid (acid aerosols), hydrogen fluoride, and metal category compounds. Additionally, manufacturing of EPCRA section 313 chemicals during waste treatment is commonly overlooked. For example, the treatment of nitric acid may result in the manufacturing of a reportable chemical (nitrate compounds). This error type is not detected nor listed on an eFDP report.

## Container Residue

**Overlooking container residue.** Container residue must not be disregarded in release and other waste management calculations. This error type is not detected nor listed on an eFDP report. Even a “RCRA empty” drum is expected to contain a residue and it must be considered for TRI reporting. Additionally, on-site drum rinsing and disposal of the rinsate will result in a release and other waste management activity. Refer to Part II, Section 6.2 for more information regarding container residue.

## Part I. Facility Identification Information

### Section 1. Reporting Year

- **Invalid TRI-MEweb Forms:** Users must pick the reporting year before starting to enter any chemical release data. Users may start a blank form or choose to import prior year data into current year forms from the *Form Summary Table* on the TRI-MEweb Welcome page after clicking on the (+) sign next to TRIFID of the reporting facility. If the preparer transmitted, certified and submitted a form with an incorrect reporting year selected, a revision of this form cannot change the reporting year field. Instead, the incorrect reporting year form must be withdrawn and resubmitted under the correct reporting year. This error type is not detected nor listed on an eFDP report.

### Section 2. Trade Secret Information

**Applies to:** Paper forms only

**Incorrect completion of trade secret information.** The responses to trade secret questions in Part I Section 2 and Part II Section 1.3 of Form R/Form A must be consistent. If trade secrecy is indicated, a sanitized Form R/Form A and two trade secret substantiations (one sanitized) must be submitted in the same package as the unsanitized trade secret Form R/Form A. Part II Section 1.3 should be blank if no trade secret claim is being made. Also, if you indicate in Part I, Section 2.1 that you are **not** claiming trade secret information, leave Part I, 2.2 blank. This error type is listed on an eFDP as a NOSE.

### Section 3. Certification

**Applies to:** TRI-MEweb submissions only

**Uncertified TRI-MEweb submissions.** If you are submitting your Form R and/or Form A via TRI-MEweb and CDX, you must electronically sign the submission before it can be loaded into the TRI database. Uncertified electronic submissions will not be accepted and facilities will be considered

not to have filed their TRI report until it is certified.

## Section 4. Facility Identification

**Questionable entries.** Incorrect entries may be corrected by the reporting facility through a revision. The use of the TRI-MEweb software may prevent such errors from occurring. Questionable entries may include:

- Incorrect street address;
- Incorrect ZIP codes;
- Invalid County names;
- Invalid NAICS codes;
- Invalid Dun & Bradstreet numbers;

Note: These error types are not detected nor listed on an eFDP report.

## Part II. Chemical-Specific Information

### Section 1. Toxic Chemical Identity

**Applies to:** Paper forms (trade secret submissions) only

**Reporting chemical abstract service (CAS) registry numbers in Section 1.1.** In 1992, EPA assigned alphanumeric category codes to the twenty chemical categories for the purposes of reporting the CAS number field in Section 1.1. Incorrect use of chemical category codes have caused errors on TRI forms requiring forms to be withdrawn and resubmitted. When completing a Form R for a chemical category, the appropriate code for that category must be provided in Section 1.1. The CAS numbers are listed in Table II: “Section 313 Toxic Chemical List,” and if needed, the category codes are listed in Appendix B: “Reporting Codes for EPA Form R.” Category guidance documents are listed in the Chemical and Industry Guidance Documents section in this document. This error type is not detected nor listed on an eFDP report.

**Invalid chemical identification in Section 1.2.** The CAS number and the chemical name reported here must exactly match the listed official EPCRA section 313 CAS number and EPCRA section 313 chemical name. This error type is listed on an eFDP as a NOTE.

**Applies to:** TRI-MEweb submissions only.

**Failure to check for synonyms.** Some reportable chemicals (especially glycol ethers and toluene diisocyanates) have many synonyms that do not readily imply they are in the category. For example, benzene,1,3-diisocyanatomethyl may not be readily recognized as toluene diisocyanate (mixed isomers). This error type is not detected nor listed on an eFDP report.

**Generic chemical name used in Section 1.3.** A generic chemical name should only be provided if the section 313 chemical identity is claimed as a trade secret. Generic names should not be used if no trade secret submissions are being claimed by a reporting facility. This error type is listed on an eFDP as a NOSE.

**Failure to consider an EPCRA section 313 chemical qualifier.** Only EPCRA section 313 chemicals in the form specified in the qualifier require reporting under section 313 and should be reported on Form R with the appropriate qualifier in parentheses. For example, isopropyl alcohol is listed on the EPCRA section 313 chemical list with the qualifier manufacturing- strong acid process, no supplier notification. Thus, the ONLY facilities that should report this EPCRA section 313 chemical are those that manufacture isopropyl alcohol by the strong acid process. This error type is not detected nor listed on an eFDP report.

## Section 2. Mixture Component Identity

**Applies to:** TRI-MEweb submissions only

**Identifying chemicals used in mixtures.** Facilities should carefully review the most recent MSDS or supplier notification for every mixture brought on-site to identify all section 313 chemicals used during a reporting year. Although some mixtures may not have MSDSs, the best readily available information should be used to determine the presence of EPCRA section 313 chemicals in ores and alloys. This error type is not detected nor listed on an eFDP report.

**Mixture names in Section 2.1.** Mixture names are to be entered here only if the supplier is claiming the identity of the EPCRA Section 313 chemical a trade secret and that is the sole identification. Mixture names that include the name or CAS number of one or more EPCRA Section 313 chemicals are not valid uses of the mixture name field. This error type is not detected nor listed on an eFDP report.

## Section 3. Activities and Uses of the Toxic Chemical at the Facility

**Applies to:** Paper forms (trade secret submissions) and TRI-MEweb submissions

**Reporting EPCRA section 313 chemical activity.** EPCRA section 313 chemical activity is commonly overlooked or misclassified. *Any activity* involving the manufacture, process, or otherwise use of an EPCRA Section 313 chemical must be examined. For example, waste treatment operations otherwise use EPCRA Section 313 chemicals to treat waste

streams and may coincidentally manufacture an additional EPCRA Section 313 chemical as a result of the treatment reaction. Such activity must be considered. Further, EPCRA Section 313 chemical activity must be correctly classified as either “manufactured,” “processed,” or “otherwise used.”

**Section 3.1** Manufacture means to produce, prepare, compound, or import an EPCRA Section 313 chemical.

**Section 3.2** Process means the preparation of an EPCRA Section 313 chemical after its manufacture, which usually includes the incorporation of the EPCRA Section 313 chemical into the final product, for distribution in commerce.

**Section 3.3** Otherwise use encompasses any use of an EPCRA Section 313 chemical that does not fall under the terms “manufacture” or “process,” and includes treatment for destruction, stabilization (without subsequent distribution in commerce), disposal, and other use of an EPCRA Section 313 chemical, including an EPCRA Section 313 chemical contained in a mixture or other trade name product. Otherwise use of an EPCRA Section 313 chemical does not include disposal, stabilization (without subsequent distribution in commerce), or treatment for destruction unless:

1. The EPCRA Section 313 chemical that was disposed of, stabilized, or treated for destruction was received from off-site for the purposes of further waste management; or
2. The EPCRA Section 313 chemical that was disposed of, stabilized, or treated for destruction was manufactured as a result of waste management activities on materials received from off-site for the purposes of further waste management activities.

For example, solvents in paint applied to a manufactured product are often misclassified as processed, instead of otherwise used. Because the solvents are not incorporated into the final product, the solvent is being otherwise used, not processed. This error type is not detected nor listed on an eFDP report.

## Section 4. Maximum Amount of the Toxic Chemical On-site at Any Time During the Calendar Year

**Applies to:** Paper forms only (trade secret submissions)

**Maximum amount on-site left blank.** Form has failed to provide the appropriate code for maximum amount on site. This error type is listed on an eFDP as a NOSE.

**Incorrect units of measure.** If amounts are reported in

units other than pounds (e.g., metric units) or with exponential numbers, EPA may require a revision of the Form R/Form A submitted. The exception is for the reporting of dioxin and dioxin-like compounds where the amounts are reported in grams. This error type is not detected nor listed on an eFDP report.

### Section 5. Quantity of the Toxic Chemical Entering Each Environmental Medium On-site

**Applies to:** Paper forms (trade secret submissions) and TRI-MEweb submissions

**Incorrectly reporting stack emissions.** Fugitive emissions from general indoor air should not be reported as stack emissions when released from a single building vent. Additionally, stack emissions from storage tanks, including loading, working, and breathing losses from tanks, should not be overlooked or reported as fugitive emissions. This error type is not detected nor listed on an eFDP report.

**Overlooking releases to land.** Section 313 chemicals placed in stockpiles or in surface impoundments should be reported as a “release to land” even if no Section 313 chemicals leak from these sources. Quantities of Section 313 chemicals land-treated should be reported as a release to land. This error type is not detected nor listed on an eFDP report.

### Section 6. Transfers of the Toxic Chemical in Wastes to Off-site Locations

**Applies to:** Paper forms (trade secret submissions) and TRI-MEweb submissions

**Reporting discharges to POTWs in Section 6.1.** When quantities of a listed mineral acid are neutralized to a pH of 6 or greater, the quantity reported as discharged to a POTW should be reported as zero. It is incorrect to enter “NA” (Not Applicable), in such a situation. This error type is not detected nor listed on an eFDP report.

**Reporting other off-site transfers in Section 6.2.** Any quantities reported in Sections 8.1, 8.3, 8.5, and 8.7 as sent off-site for disposal, treatment, energy recovery, or recycling, respectively, must also be reported in Section 6.2 along with the receiving location and appropriate off-site activity code. This error type is not detected nor listed on an eFDP report.

### Section 7A. On-Site Waste Treatment Methods and Efficiency

**Applies to:** Paper forms (trade secret submissions) and TRI-MEweb submissions

**Failure to report waste treatment methods in Section 7A.** Waste treatment methods used to treat waste streams containing EPCRA Section 313 chemicals, and the efficiencies of these methods, must be reported on Form R. Information must be entered for all waste streams, even if the waste treatment method does not affect the EPCRA Section 313 chemical. If no waste treatment is performed on waste streams containing the EPCRA Section 313 chemical, the box marked Not Applicable in Section 7A should be checked on Form R. This error type is not detected nor listed on an eFDP report.

**Incorrect reporting of waste treatment methods in Section 7A.** The type of waste stream, waste treatment efficiency, and waste treatment method for each waste stream are required to be reported on Form R using specific codes. The waste treatment codes are listed in Appendix B: Reporting Codes for EPA Form R. A table is also provided in Appendix B that displays a crosswalk between the old codes and new ones for reporting year 2005. This error type is not detected nor listed on an eFDP report.

### Section 7B. On-Site Energy Recovery Processes

**Applies to:** Paper forms (trade secret submissions) and TRI-MEweb submissions

**Reporting on-site energy recovery methods in Section 7B.** When a quantity is reported in Section 8.2 as combusted for energy recovery on-site, the type of energy recovery system used must be reported in Section 7B, and vice versa. This error type is not detected nor listed on an eFDP report.

### Section 7C. On-Site Recycling Processes

**Applies to:** Paper forms (trade secret submissions) and TRI-MEweb submissions

**Reporting on-site recycling methods in Section 7C.** When a quantity is reported in Section 8.4 as recycled on-site, the type of recovery method must be reported in Section 7C, and vice versa. This error type is not detected nor listed on an eFDP report.

## Section 8. Source Reduction and Recycling Activities

The TRI-MEweb software offers a Section 8 Calculator. The Section 8 Calculator will assist users in calculating their Section 8 source reduction and recycling activity quantities. Please note that if you use range codes to report data in sections 5 and 6, TRI-MEweb will default to the mid-point of the range when performing section 8 calculations.

*The entries in this section must be completed, even if your facility does not engage in source reduction or recycling activities.*

**Applies to:** Paper forms and TRI-MEweb submissions

- Columns C and D, the future year projections for questions 8.1 through 8.7, must be completed. EPA expects a reasonable estimate for the future year projections. Zero can be used in columns C and D to indicate that the manufacture, process, or otherwise use of the chemical will be discontinued. In such cases, columns C and D for Section 8.1 through 8.7 must all contain zeroes.

Paper forms: Listed on an eFDP as a NOSE.

TRI-MEweb: TRI-MEweb submissions will not be allowed to be submitted to EPA with this error type.

**Applies to:** Paper forms only (trade secret submissions)

- It is incorrect to use range codes to report quantities in Section 8. Range codes can be used only in Sections 5 and 6 of Form R.
- It is incorrect to use the same codes from Section 4 for reporting the maximum amount of the reported EPCRA Section 313 chemical on-site to report quantities in Section 8.
- Quantities reported in Section 8.1 through 8.7 are mutually exclusive and additive. This means that quantities of the reported EPCRA Section 313 chemical must not be double-counted in Section 8.1 through 8.7.
- Some double-counting errors have been due to confusion over the differences in how on-site treatment of an EPCRA Section 313 chemical is reported in Section 7A as compared to Section 8. In Section 7A, information on the treatment of *waste streams* containing the EPCRA Section 313 chemical is reported, along with the percent efficiency in terms of destruction **or** removal of the EPCRA Section 313 chemical from each waste stream. In Section 8, only the quantity of the *EPCRA Section 313 chemical* actually destroyed through the treatment processes reported in Section 7A is reported in Section 8.6 to avoid

double-counting within Sections 8.1 through 8.7.

- Quantities reported in Section 8.1 through 8.7 must not be reported in Section 8.8 and vice versa.
- Any time a reported EPCRA Section 313 chemical is contained in a waste, and the waste is associated with routine production-related activities and is recycled, combusted for energy recovery, treated, disposed of, or otherwise released either on- or off-site, that quantity of the EPCRA Section 313 chemical must be included in the quantities reported in Sections 8.1 through 8.7

All calculation errors will be listed on an eFDP as a NOSE.

**Reporting quantities in Section 8.1** Quantities of EPCRA Section 313 chemicals that are released (including disposed of) on-site and reported in Section 5 of Form R must be reported in either Section 8.1a or 8.1b.

$\$8.1a = \$ 5.4.1 + \$ 5.5.1A + \$ 5.5.1B - \$ 8.8$  (on-site disposal to landfills or UIC Class I Wells)<sup>1</sup>

$\$ 8.1b = \$ 5.1 + \$ 5.2 + \$ 5.3 + \$ 5.4.2 + \$ 5.5.2 + \$ 5.5.3A + \$ 5.5.3B + \$5.5.4 - \$ 8.8$  (on-site disposal or other releases, other than disposal to landfills or UIC Class I Wells)<sup>1</sup>

Quantities of EPCRA Section 313 chemicals transferred off-site for the purposes of disposal reported in Section 6.2 using the following codes must appear in Section 8.1c:

- M64 Other Landfills
- M65 RCRA Subtitle C Landfills
- M81 Underground Injection to Class I Wells

$\$ 8.1c = \$ 6.1$  (portion of transfer that is untreated and ultimately disposed of in landfills or UIC Class I Wells) +  $\$ 6.2$  (quantities associated with M codes M64, M65, and M81) -  $\$ 8.8$  (off-site disposal to landfills or UIC Class I Wells)<sup>1</sup>

Metals and metal category compounds transferred off-site to POTWs in Section 6.1 must appear in Section 8.1c or 8.1d. To report correctly in Sections 8.1a through d, a facility must include quantities that are disposed of or otherwise released to the environment either on-site or off-site, excluding disposal or other releases due to catastrophic events or non-production related activities.

Quantities of EPCRA Section 313 chemicals transferred off-site for the purposes of disposal reported in Section 6.2 using the following codes must appear in Section 8.1d:

- M10 Storage Only
- M41 Solidification/Stabilization - Metals and Metal Category Compounds Only

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- M62 Wastewater Treatment (excluding POTW) - Metals and Metal Category Compounds Only
- M66 Subtitle C Surface Impoundment
- M67 Other Surface Impoundments
- M73 Land Treatment
- M79 Other Land Disposal
- M82 Underground Injection to Class II-V Wells
- M90 Other Off-Site Management
- M94 Transfer to Waste Broker - Disposal
- M99 Unknown.

§ 8.1d = § 6.1 (portion of transfer that is untreated and ultimately disposed of or otherwise released, other than disposal to landfills or UIC Class I Wells) + § 6.2 (quantities associated with M codes M10, M41, M62, M66, M67, M73, M79, M82, M90, M94, and M99) - § 8.8 (off-site disposal or other releases due to catastrophic events, other than disposal to landfills or UIC Class I Wells)<sup>1</sup>

All calculation errors will be listed on an eFDP as a NOSE.

### Reporting quantities in Section 8.2 “Quantity used for energy recovery on-site.”

A quantity must be reported in Section 8.2 for the current (reporting) year when a method of on-site energy recovery is reported in Section 7B, and vice versa. An error facilities make when completing Form R is to report the methods of energy recovery used on-site in Section 7B but not report the total quantity associated with those methods. Another error is to report a quantity in this section if the combustion of the EPCRA Section 313 chemical took place in a system that did not recover energy (e.g., an incinerator). A quantity of the EPCRA Section 313 chemical combusted for energy recovery must not be reported if the EPCRA Section 313 chemical does not have a significant heating value. Examples of EPCRA Section 313 chemicals that do not have significant heating values include metals, metal portions of metal category compounds, and halons. Metals and metal portions of metal compounds will never be treated or combusted for energy recovery. Any quantities of the EPCRA Section 313 chemical associated with non-production related activities such as catastrophic releases and remedial actions, as well

<sup>1</sup> §8.8 includes quantities of toxic chemicals disposed of or otherwise released on site or managed as a waste off site due to remedial actions, catastrophic events, or one-time events not associated with the production processes.

as other one-time events not associated with routine production practices that were combusted for energy recovery on-site must not be included in Section 8.8.

All calculation errors will be listed on an eFDP as a NOSE.

### Reporting quantities in Section 8.3 “Quantity used for energy recovery off-site.”

As in Section 8.2, a quantity must not be reported in this section if the off-site combustion of the EPCRA Section 313 chemical took place in a system that did not recover energy (e.g., incinerator). A quantity of an EPCRA Section 313 chemical must not be reported as sent off-site for the purposes of energy recovery if the EPCRA Section 313 chemical does not have a significant heating value. Examples of EPCRA Section 313 chemicals that do not have significant heating values include metals and metal portions of metal category compounds. Metals and metal portions of metal category compounds will never be combusted for energy recovery. Quantities must be reported in Section 8.3 that are reported in Section 6.2 as transferred off-site for the purposes of combustion for energy recovery using the following codes:

- M56 Energy Recovery
- M92 Transfer to Waste Broker - Energy Recovery

§ 8.3 = § 6.2 (energy recovery) - § 8.8 (off-site energy recovery)<sup>2</sup>

All calculation errors will be listed on an eFDP as a NOSE.

### Reporting quantities in Section 8.4 “Quantity recycled on-site.”

A quantity must be reported in Section 8.4 for the current reporting year when a method of on-site recycling is reported in Section 7C, and vice versa. An error a facility may make when completing Form R is to report the methods of recycling used on-site in Section 7C but not report the total quantity recovered using those methods.

In addition, only the amount of the chemical that was actually recovered is to be reported in Section 8.4. Any quantities of the EPCRA Section 313 chemical associated with non-production related activities such as catastrophic releases and remedial actions, as well as other one-time events not associated with routine production practices

<sup>2</sup>§8.8 includes quantities of toxic chemical disposed of or otherwise released on-site or managed as waste off-site due to remedial actions, catastrophic events, or one-time events not associated with the production processes.

that were recycled on-site must not be included in Section 8.8.

All calculation errors will be listed on an eFDP as a NOSE.

**Reporting quantities in Section 8.5. “Quantity recycled off-site.”** Quantities reported in Section 6.2 as transferred off-site for the purposes of recycling must be included in Section 8.5 using the following codes:

- M20 Solvents/Organic Recovery
- M24 Metals Recovery
- M26 Other Reuse or Recovery
- M28 Acid Regeneration
- M93 Transfer to Waste Broker - Recycling.

$$\text{\$8.5} = \text{\$6.2 (recycling)} - \text{\$8.8 (off-site recycling)}^2$$

All calculation errors will be listed on an eFDP as a NOSE.

**Reporting quantities in Section 8.6 “Quantity treated on-site.”** Quantities may not always have to be reported in Section 8.6 when Section 7A is completed. This is because the information reported in Section 7A and Section 8 is different. Information on how waste streams containing the reported EPCRA Section 313 chemical are treated is reported in Section 7A, while the quantity of the EPCRA Section 313 chemical actually destroyed as a result of on-site treatment is reported in Section 8.6. If a quantity is reported in Section 8.6, Section 7A must be completed but the reverse may not be true. This may result in apparent discrepancies between Section 7A and Section 8. For example, a facility may treat wastewater containing an EPCRA Section 313 chemical by removing the EPCRA Section 313 chemical and then disposing of it on-site. The treatment of the wastewater would be reported in Section 7A, with an efficiency estimate based on the amount of the EPCRA Section 313 chemical removed from the wastewater. Although the chemical in the waste stream has been treated because the chemical has been removed, the EPCRA Section 313 chemical has not been treated because it has not been destroyed. The facility would report only the amount of the EPCRA Section 313 chemical actually destroyed during treatment in Section 8.6 and the amount ultimately disposed of in Section 8.1 to avoid double-counting the same quantity in Section 8. In cases where the EPCRA Section 313 chemical is not destroyed during a treatment process and subsequently enters another activity, such as disposal (e.g., metals removed from wastewater and subsequently disposed of on-site), the quantity of the EPCRA Section 313 chemical would be reported as disposed of in Section 8.1,

not as treated in Section 8.6. Any quantities of the EPCRA Section 313 chemical associated with non-production related activities such as catastrophic releases and remedial actions, as well as other one-time events not associated with routine production practices that were treated for destruction on-site must not be included in Section 8.8. Metals generally will not be treated for destruction.

All calculation errors will be listed on an eFDP as a NOSE.

**Reporting quantities in Section 8.7 “Quantity treated off-site.”** Quantities reported in Section 6.2 as transferred off-site for the purposes of treatment must be included in Section 8.7 using the following codes:

- M40 Solidification/Stabilization
- M50 Incineration/Thermal Treatment
- M54 Incineration/Insignificant Fuel Value
- M61 Wastewater Treatment (excluding POTW)
- M69 Other Waste Treatment
- M95 Transfer to Waste Broker - Waste treatment.

Quantities of an EPCRA Section 313 chemical, except metals and metal category compounds, sent off-site to a POTW should also be reported in Section 8.7. If you know, however, that a chemical is not treated for destruction at the POTW you should report that quantity in Section 8.1 instead of 8.7.

To report correctly EPCRA Section 313 chemicals in Section 8.7, use the following equation.

$$\text{\$8.7} = \text{\$6.1 (portion of transfer that is ultimately treated)} + \text{\$6.2 (treatment)} - \text{\$8.8 (off-site treatment)}^3$$

All calculation errors will be listed on an eFDP as a NOSE.

**Reporting quantities in Section 8.8 Quantity released to the environment as a result of remedial actions, catastrophic events or one-time events not associated with production processes.** The quantities that are reported in Section 8.8 are associated with non-production related activities such as catastrophic releases and remedial actions, as well as one-time events not

<sup>3</sup>\\$8.8 includes quantities of toxic chemical disposed of or otherwise released on-site or managed as waste off-site due to remedial actions, catastrophic events, or one-time events not associated with the production processes.



## Appendix C

associated with routine production practices that were disposed of or released directly to the environment or transferred off-site for the purposes of recycling, energy recovery, treatment or disposal. Quantities reported in Section 8.8 must not be reported in Section 8.1 through 8.7.

**Applies to:** Paper forms (trade secret submissions) and TRI-MEweb submissions

**Reporting the production ratio in Section 8.9.** A production ratio or activity index must be provided in Section 8.9. A zero is not acceptable and NA (Not Applicable) can be used only when the reported EPCRA Section 313 chemical was not manufactured, processed, or otherwise used in the year prior to the reporting year. TRI-MEweb in RY 2012 is providing an optional worksheet to help calculate the production ratio.

**Calculating production ratio in Section 8.9.** In calculating a production ratio for otherwise used chemicals, an activity index must be used rather than quantities purchased or released from year to year.

**Reporting source reduction activities in Section 8.10.**

It is an error to report a source reduction activity in Section 8.10 and not report at least one method used to identify that activity and vice versa.

All calculation errors will be listed on an eFDP as a NOSE.

### C.3 eFDP Messages Used to Report Notices of Significant Errors

**Note:** EPA is continually trying to improve the error checking system for TRI submissions. As a result, a small number of the error messages in this appendix may be changed by the time the Reporting Year 2013 submissions are checked. Most of these messages will remain the same. You can look for changes to these error messages on the TRI home page at <http://www.epa.gov/tri>

**Applies to:** Paper forms only (trade secret submissions)

1. You have used an invalid Form R or Form A by using either a form not applicable for the reporting year, or a facsimile form that has not been approved by EPA. Resubmit your data on a current EPA approved Form R or A.
2. Pages were missing from the form received. Correct this by resubmitting a complete certified form for this chemical substance.
3. Multiple chemicals were reported in your Form R. You must submit a separate and complete Form R for each chemical cited.

4. You have provided a valid CAS number and a valid chemical name, but they do not match. Respond by providing a valid CAS number and matching chemical name.
5. You have left part or all of the chemical identification sections blank. Respond by providing a valid CAS number and matching chemical name or Mixture Component Identity.
6. You reported a CAS number and chemical name that are invalid. Respond by providing a valid CAS number and matching chemical name.
7. Your form indicated Trade Secret status with an indication that this form is a Sanitized version, but the report contains no Generic Chemical Name. You must provide a Generic Chemical Name for this sanitized form.
8. You have reported Dioxin and Dioxin-like Compounds on a Form A. Dioxin and Dioxin-like Compounds are not eligible for the alternate threshold. Thus, this chemical must be reported on a Form R. Please resubmit your data on a Form R.
9. In Part I, Section 1of the Form R or Form A Certification Statement You did not enter a reporting year. (Note: EPA has set the year to 2084 as a default.) You must enter a valid reporting year for your Form R or Form A Certification Statement. This entry cannot be left blank and NA may not be used. (NOSE)
10. In Part I, Section 1of the Form R or Form A Certification Statement you provided an invalid or future reporting year. You must enter a valid reporting year for your Form R or Form A Certification Statement. Valid years are 1987 through 2012. This entry cannot be left blank and NA may not be used. (NOSE)
11. You have reported a negative number(s) in Part II, Sections 5 and/or 6 and/or 8 of your Form R. Quantities reported in these sections must be 0 or greater. Please respond by providing correct release or other waste management data.
12. You did not complete Part II, Sections 5 and 6. Please provide the required information; otherwise indicate NA.
13. You did not complete Part II, Section 7. Please provide the required information; otherwise indicate NA.
14. You did not complete Part II, Section 8. Please provide the required information; otherwise indicate NA.

## C.4 Messages Used to Report Notices of Technical Errors (NOTEs) and Non-technical Data Changes (NDCs)

### Invalid codes throughout Form R

**Applies to:** Paper forms only (trade secret submissions)

15. You submitted an invalid code. To correct this, consult the instructions for the proper table value and provide a valid code value. [Specific location on the form of the invalid code is given.] (NOTE)
16. PBT chemicals (e.g., Dioxin and Dioxin-like Compounds, Lead Compounds, Mercury Compounds and Polycyclic Aromatic Compounds (PACs)) are ineligible for range reporting for on-site releases and transfers off-site for further waste management. Please provide specific release, transfer, and other waste management values.(NOTE)
17. For aluminum (fume or dust) or zinc (fume or dust), the Waste Management codes M56 and M92 are unacceptable. Please provide the proper Waste Management codes for these chemicals. (NOTE)
18. For asbestos (friable), the Waste Management codes M56 and M92 are unacceptable. Please provide the proper Waste Management codes for these chemicals. (NOTE)

### General Errors for both the Form R and/or Form A

**Applies to:** Paper forms only (trade secret submissions)

19. You reported a negative value for a release, transfer or other waste management quantity. Please provide a non-negative value for the specified part and section. (NOTE)
20. You have reported a value for a PBT chemical beyond seven digits to the right of the decimal. EPA's data management systems support data precision up to seven digits to the right of the decimal. EPA has truncated your numeric submission so the number of digits to the right of the decimal does not exceed seven. If this was incorrect, specify the correct value, not exceeding seven digits to the right of the decimal. (NDC)

### Errors in Part I, Facility Identification Information

**Applies to:** Paper forms only (trade secret submissions)

21. No selection was made in Part I, Section 2.1 and 2.2 (Trade Secret Information) and a generic chemical name was not provided in Part II, Section 1.3. Therefore, the No box was selected in Part I, Section 2.1. If this was incorrect, and you intended

to make a trade secret claim of the identity of the toxic chemical, you must resubmit following the requirements of 40 CFR Part 350 to claim trade secret. (NDC)

22. You indicated trade secret in Part I, Section 2.1 (Trade Secret Information) but made no selection for Part I, Section 2.2 (sanitized/unsanitized) and did not provide a generic chemical name in Part II, Section 1.3. EPA changed your selection in Part I, Section 2.1 to indicate that a trade secret claim is not being made. If this was incorrect, and you intended to make a trade secret claim for the identity of the toxic chemical, you must resubmit following the requirements of 40 CFR Part 350 to claim trade secret. (NDC)
23. You made a selection of No in Part I, Section 2.1 (Trade Secret Information) and selected unsanitized in Part I, Section 2.2. In Part II, Section 1.3 a generic name was indicated. Part II, Section 1.3 should be completed only if trade secret is being claimed (Part I, Section 2.1). EPA will move the chemical name information in Part II, Section 1.3 to Part II, Section 1.2. If this is incorrect and you wish to claim trade secret, you must resubmit following the requirements of 40 CFR Part 350. (NDC)
24. In Part I, Section 4.1, you entered NA or did not enter a county name, city name, state code, and/or zip code. These fields may not be left blank and NA is not an acceptable entry. You must provide a county name, city name, state code, and/or zip code where the facility is located. (NDC)
25. EPA has corrected the county name, city name, state code, and/ or zip code that you identified in Part I, Section 4.1. The county name, city name, state code, and/ or zip code that you identified was either misspelled, or incorrect, or did not match the previous year submissions. If you feel our correction was made in error, please resubmit forms with correct information. (NDC)
26. In Part I, Section 4.1, you have used an invalid TRIFID or you have self-assigned your own TRIFID or TRIFID that has been superseded. You may not generate your own TRIFID. The TRI Data Processing Center assigns this number to a facility. EPA has corrected this error and assigned you the correct TRIFID. Please note the corrected TRIFID and keep it for use in future submissions. (NDC)
27. No Public Contact name and/or telephone number was listed. Please provide the name and telephone number of your Public Contact. (NOTE)
28. No Technical Contact name and/or telephone number was listed. Please provide the name and telephone number of your Technical Contact. (NOTE)
29. The Federal Facility box was not checked on your form but we believe you are a Federal Facility.

## Appendix C

Unless you respond that you are not a Federal Facility, we will continue to treat you as a Federal Facility. (NOTE)

30. A valid NAICS code was not provided. Please provide at least one valid primary six-digit NAICS code. (NOTE)
31. You reported an invalid state code. If the address is in the US, please use a valid US Postal Service state code (see Table III of the Reporting Forms and Instructions). If the address is not in the US, please enter a valid code in the Country Field (see Table IV of the Reporting Forms and Instructions) (NOTE)
32. Either Box A (An Entire Facility) or Box B (Part of a Facility) should be checked in Part I, Section 4.2. One of the 2 boxes must be checked, but not both. (NOTE)
33. If applicable, check either Box C (Federal Facility) or Box D (GOCO) in Part I, Section 4.2, but do not check both boxes. (NOTE)
34. Dun and Bradstreet Numbers (Part I Section 4.6) are typically 9 characters in length. Please check the number(s) submitted. If they are incorrect, please make the appropriate changes. If you believe that they are correct, no further action is necessary. (NOTE)
35. If this is a North American phone number, please enter all 10 digits (i.e., include area code). If this is for another country, please begin the phone number with "011" as the prefix to your international telephone number. (NOTE)
36. In Part I, Section 3, you did not provide a printed or typed name and official title of owner/operator or senior management official. It cannot be N/A or left blank. Please provide a name for owner/operator or senior management official. (NOTE)
37. In Part I, Section 5.1 you did not enter the name of the parent company. This block cannot be left blank. You must enter the name for the parent company if it is a U.S. company. If it is a foreign company then you may check the [NA] box. (NOTE)
38. The parent company Dun and Bradstreet Number in Part I, Section 5.2 (typically a 9-digit number) cannot be left blank. However, if your parent company does not have a Dun and Bradstreet Number check the [NA] box next to Part I, Section 5.2. (NOTE)

### Errors in Part II, Section 1. Toxic Chemical Identity

**Applies to:** Paper forms only (trade secret submissions)

39. You have correctly identified the chemical but have used a synonym for the chemical name. EPA

has changed the Chemical Name to use the preferred TRI nomenclature. Please specify the correct CAS Number and matching Chemical Name. (NDC)

40. The CAS number you reported was changed to match the chemical name reported, because the CAS number you provided was not a valid TRI Chemical. If this was incorrect, specify a valid CAS number and matching chemical name. (NDC)
41. The chemical name you reported was changed to match the CAS number reported, because the chemical name you provided was not a valid TRI Chemical. If this was incorrect, specify a valid CAS Number and matching Chemical Name. (NDC)
42. You reported a valid TRI CAS Number, a valid Chemical Name, and a generic Chemical Name. Therefore, the Generic Chemical Name was deleted. If this was incorrect, specify the Generic Chemical Name to be used. (NDC)
43. You reported a valid TRI CAS Number, a valid Chemical Name, and a Mixture Component Identity. Therefore, the Mixture Component Identity was deleted. If this was incorrect, specify the Mixture Component Identity to be used. (NDC)
44. EPA has changed the TRI chemical category code you reported in Part II, Section 1.1 from N151 to N150 (the code was incorrectly listed in some pages of the Reporting Forms and Instructions), the correct TRI chemical category code for Dioxin and Dioxin-like Compounds. If this is incorrect and you are not reporting Dioxin and Dioxin-like Compounds, please specify the correct CAS number or chemical category code and matching chemical name. (NDC)
45. You have reported for isopropyl alcohol (Only persons who manufacture by the strong acid process are subject) (CAS number 67-63-0). If you did not manufacture isopropyl alcohol by the strong acid process, you have submitted this form in error and should request that the form be withdrawn. (NOTE)

### Errors in Part II, Section 3. Activities and Uses of Toxic Chemical at The Facility

**Applies to:** Paper forms only (trade secret submissions)

46. You did not indicate in Part II, Section 3 which activity(ies) or use(s) of the EPCRA Section 313 chemical occur at your facility. Please indicate at least one of the activity(ies) and use(s) of the EPCRA Section 313 chemical occur at your facility. (NOTE)

**Errors in Part II, Section 4. Maximum Amount of the Toxic Chemical Onsite at Any Time During the Calendar Year**

**Applies to:** Paper forms only (trade secret submissions)

- 47. You did not complete Part II, Section 4.1. Please provide a valid two digit code for the “maximum amount of chemical on-site at any time during the calendar year.” (NOTE)

**Errors in Part II, Section 5. Quantity of the Toxic Chemical Entering Each Environmental Medium Onsite**

**Applies to:** Paper forms only (trade secret submissions)

- 60. You did not complete Part II, Section 5.3. If you have discharged to water, please provide the Stream/Water Body name, the Release estimate or range code, Basis of Estimate and % from Stormwater; otherwise indicate “NA” (Not Applicable). (NOTE)
- 61. There are missing or incomplete data for Part II, Section 5.3. If you have discharged to water, please provide the Stream/Water Body name, the Release estimate or range code, Basis of Estimate and % from Stormwater; otherwise indicate “NA” (Not Applicable). (NOTE)
- 62. You did not complete Part II, Section 5. Please provide the Release estimate or range code and Basis of Estimate; otherwise indicate “NA” (Not Applicable). (NOTE)
- 63. There are missing or incomplete data for Part II, Section 5. Please provide the Release estimate or range code and Basis of Estimate; otherwise indicate “NA” (Not Applicable). (NOTE)

**Errors in Part II, Section 6. Transfers of the Toxic Chemical in Wastes To Off-Site Locations**

**Applies to:** Paper forms only (trade secret submissions)

- 64. You did not complete Part II, Section 6.1, “discharges to POTW.” If you did not discharge wastewater containing the Section 313 chemical to a POTW(s), enter “NA” (Not Applicable), otherwise please provide the Transfer amount or range code, Basis of Estimate, POTW Name and Location. (NOTE)
- 65. You reported a POTW(s) name and location but did not provide a Transfer amount. Please provide a Total Transfer amount or range code and Basis of Estimate; otherwise, if there was no transfer to a POTW of wastewater that contains or contained the Section 313 chemical, delete the POTW location and indicate “NA” (Not Applicable) for the POTW transfer amount. (NOTE)

- 66. You reported a Total Transfer amount or range code and Basis of Estimate in Part II Section 6.1 but did not indicate a POTW name and location in Section 6.1.B. Please provide the POTW Name and Location. (NOTE)
- 67. You provided an incomplete POTW name and address. Please provide the name and complete address for the POTW. (NOTE)
- 68. There are missing or incomplete data for Part II, Section 6.1. Please provide the transfer amount or range code and Basis of Estimate for Discharges to POTWs. (NOTE)
- 69. You did not complete Part II, Section 6.2, “Transfers to Other Off-site Locations.” If you did not transfer the waste containing the Section 313 chemical to other off-site locations, enter “NA” (Not Applicable), otherwise please provide Offsite EPA ID, Name, Location, Transfer amount or range code, Basis of Estimate, and type of Waste Management code. (NOTE)
- 70. You reported an Off-site Transfer amount or range code and Basis of Estimate in Part II Section 6.2 but did not indicate an Off-site name and location in Section 6.2. Please provide the Off-site Name and Location. (NOTE)
- 71. You reported an Off-site name and location but did not provide a Transfer amount. Please provide a Total Transfer amount or range code, Basis of Estimate and type of Waste Management code; otherwise, if there was no transfer to this Off-site location, delete the Off-site name and location and indicate “NA” (Not Applicable) in the Off-site EPA Identification Number (RCRA ID No.) field. (NOTE)
- 72. You provided both county and country data. If this is an extra-national transfer, indicate the off-site name, address, and Country Code; if a domestic Offsite, provide the Off-site Name and correct address. (NOTE)
- 73. You reported an Off-site name and location, but there are missing or incomplete data for the off-site transfer amount, basis of estimate and type of waste management code. Please provide the Off-site Transfer amount or range code, Basis of Estimate, and type of Waste Management code. (NOTE)
- 74. You provided incomplete off-site name and address data. For a transfer to a domestic off-site location, you must provide a street address, city, state, county and zip code. For a transfer to a foreign off-site location, you must provide a street address, city and a two character country code. (NOTE)
- 75. You reported an invalid Type of Waste Management code. For metals/metal compounds use only disposal and certain recycling activities

codes. Consult the Reporting Instructions for metal and metal compounds and correct with a valid Waste Management (i.e., "M") code. (NOTE)

76. You reported an invalid Type of Waste Management code. For Barium Compounds use only disposal and certain recycling activities codes, M61-Wastewater Treatment (Excluding POTW) or M69-Other Waste Treatment. Consult the Reporting Instructions for metal and metal compounds and correct with a valid Waste Management (i.e., "M") code. (NOTE)
77. For non-metals codes M41 and M62 are unacceptable. Provide the appropriate Disposal or Other Waste Management code for this non-metal substance. (NOTE)
78. In Part II, Section 6.2 column C you reported M codes (M56 and/or M92) for energy recovery, however you left Section 8.3 column B blank. Please provide the quantity used for energy recovery offsite in pounds/year in Section 8.3 column B. (NOTE)
79. In Part II, Section 6.2 column C you reported M Codes (M20, M24, M26, M28, M93) for recycling, however you left Section 8.5 column B blank. Please provide the quantity recycled offsite in pounds/year in Section 8.5 column B. (NOTE)
80. In Part II, Section 6.2 column C you reported M Codes (M40, M50, M54, M61, M69, M95) for treatment, however you left Section 8.7 column B blank. Please provide the quantity treated offsite in pounds/year in Section 8.7 column B. (NOTE)

### Errors in Part II, Section 7. On-Site Waste Treatment Methods and Efficiency

**Applies to:** Paper forms only (trade secret submissions)

81. There are no data contained in all of Part II, Section 7A. If you do not treat wastes containing the EPCRA Section 313 chemical at your facility, indicate "NA;" otherwise please provide the general waste stream code, waste treatment methods, range of influent concentration, waste treatment efficiency estimate and whether this is based on operating data for all on-site waste treatments for this chemical. (NOTE)
82. There are missing data in Part II, Section 7A. Please provide the general waste stream code, waste treatment methods, range of influent concentration, waste treatment efficiency estimate and whether this is based on operating data. (NOTE)
83. There are no data in Part II, Section 7B. If no on-site energy recovery processes are used for this Section 313 chemical at your facility, indicate "NA;" otherwise please provide at least one three-character on-site energy recovery process code. (NOTE)

84. There are no data in Part II, Section 7C. If no on-site recycling processes are used for this Section 313 chemical at your facility, indicate "NA;" otherwise please provide at least one three-character on-site recycling process code. (NOTE)

### Errors in Part II, Section 8. Source Reduction and Recycling Activities

**Applies to:** Paper forms only (trade secret submissions)

85. There are missing data for Part II, Section 8.1-8.7. Please provide an estimate or "NA" (Not Applicable) in each box for section 8.1 through 8.7, columns A, B, C, and D. You may only use "NA" (Not Applicable) when there is no possibility a release or transfer occurred. You may enter zero if the release or transfer was equal to or less than half a pound. (NOTE)
86. There are missing data in Part II, Section 8.8. Please provide an estimate or "NA" (Not Applicable). You may only use "NA" (Not Applicable) when there is no possibility a release or transfer occurred. You may enter zero if the release or transfer was equal to or less than half a pound. (NOTE)
87. There are no data in Part II, Section 8.9. Please provide a production ratio, an activity index, or "NA" (Not Applicable) if the chemical manufacture or use began during the current reporting year. (NOTE)
88. There are no data in Part II, Section 8.10. If your facility did not engage in any source reduction activity for the reported chemical, enter "NA" (Not Applicable) and answer 8.11. Otherwise please provide Source Reduction Activities and Methods code(s). (NOTE)
89. There are missing data in Part II, Section 8.10. Please provide Source Reduction Activities and Methods code(s). (NOTE)
90. You have reported a listed metal or metal compound category in section 8.2, 8.3, 8.6 or 8.7. However, these chemicals cannot be treated for destruction. Metal or metal compound category can only be reported as disposed of or recycled. Please report appropriately in Section 8.1, 8.4, or 8.5. (NOTE)
91. You reported a negative value for a release, transfer or other waste management quantity. Please provide a non-negative value for the specified part and section. (NOTE)

**Errors relating to the reconciliation of data in Part II, Section 8 and Part II, Sections 5, 6, and 7**

**Applies to:** Paper forms only (trade secret submissions)

92. You did not complete Sections 8.1 through 8.7 column B or 8.8. If you report releases in Part II, Section 5 and/or an off-site transfer in Section 6.2 and/or quantities transferred off-site to POTWs in Section 6.1, you must report an estimate in Part II, Sections 8.1 through 8.7 column B and/or Section 8.8. (NOTE)
93. You did not complete Sections 5, 6, or 7. If you enter an estimate in Part II, Sections 8.1 through 8.7, column B and/or Section 8.8, you must also report releases in Part II, Section 5 and/or off-site transfers in Section 6.2 and/or quantities transferred off-site to POTWs in Section 6.1 and/or waste treatment, energy recovery, or recycling codes in Section 7. Please provide data for Sections 5, 6, and/or 7. (NOTE)
94. You reported an estimate in Part II, Section 8.2, column B, "Quantity Used for Energy Recovery On-site," but did not provide an on-site energy recovery code in Part II, Section 7B. Please provide an on-site energy recovery code for Part II, Section 7B. (NOTE)
95. You reported an "On-site Energy Recovery Process" code in Part II, Section 7B, but you did not provide an estimate of the quantity used for energy recovery in Part II, Section 8.2, column B. Please provide an estimate of the quantity used for energy recovery for Part II, Section 8.2, column B. (NOTE)
96. You reported an estimate in Part II, Section 8.4, column B "Quantity Recycled On-site" but did not provide an on-site recycling code in Part II, Section 7C. Please provide an on-site recycling code for Part II, Section 7C. (NOTE)
97. You reported one or more on-site recycling process codes in Part II, Section 7C but did not provide an estimate in Part II, Section 8.4, column B, "Quantity Recycled On-site." Please provide an estimate of the quantity recycled for Section 8.4 column B. (NOTE)
98. You reported a value in Part II, Section 8.3 column B, however you did not provide a corresponding quantity with an appropriate M Code (M56 and/or M92) for energy recovery in Section 6.2 column C. Please provide the appropriate quantity and M Codes for energy recovery in Section 6.2 column C. (NOTE)
99. You reported a value in Part II, Section 8.5 column B, however you did not provide a corresponding quantity with an appropriate M Code (M20, M24, M26, M28, M93) for recycling in Section 6.2 column C. Please provide the appropriate quantity and M Codes for recycling in Section 6.2 column C. (NOTE)
100. You reported a value in Part II, Section 8.7 column B, however you did not report a quantity in Section 6.1 or a quantity with an appropriate M Code (M40, M50, M54, M61, M69, M95) for treatment in Section 6.2 column C. Please provide a quantity in Section 6.1 or the appropriate quantity and M Codes for treatment in Section 6.2 column C. (NOTE)
101. You have reported a listed metal or metal compound category in Part II, Section 6.1, however you have not provided a quantity released in section 8.1 column B. Note that in Section 8a, metal or metal compound category can only be reported as disposed of or recycled and not reported as treated for energy recovery or treated for destruction. Please provide quantity released in pounds/year in Section 8.1 column B. (NOTE)
102. You have reported a listed metal or metal compound category in Part II, Section 6.1, however you have not provided quantity released in 8.1d Column B. Note that in Section 8a, metal or metal compound category can only be reported as disposed of or recycled and not reported as treated for energy recovery or treated for destruction. Please provide quantity released in pounds/year Section 8.1B. (NOTE)

# Appendix D. Supplier Notification Requirements

EPA requires some suppliers of mixtures or other trade name products containing one or more of the EPCRA section 313 chemicals to notify their customers. This requirement has been in effect since January 1, 1989.

This appendix explains which suppliers must notify their customers, who must be notified, what form the notice must take, and when it must be sent.

## D.1 Who Must Supply Notification

You are covered by the section 313 supplier notification requirements if you own or operate a facility which meets all of the following criteria:

1. Your facility is in a North American Industry Classification System (NAICS) code that corresponds to Standard Industrial Classification [SIC] codes 20–39;
2. You manufacture (including import) or process an EPCRA section 313 chemical; and
3. You sell or otherwise distribute a mixture or other trade name product containing the EPCRA section 313 chemical to either:
  - A facility in a covered NAICS code (see Table I).
  - A person that then may sell the same mixture or other trade name product to a firm in a covered NAICS code (see Table I).

**Note that you may be covered by the supplier notification rules even if you are not covered by the section 313 release reporting requirements.** For example, even if you have fewer than 10 full-time employees or do not manufacture or process any of the EPCRA section 313 chemicals in sufficient quantities to trigger the release and other waste management reporting requirements, you may still be required to notify certain customers.

## D.2 Who Must Be Notified

Industries whose primary NAICS code does not correspond to SIC codes 20 through 39 are not required to initiate the distribution of notifications for EPCRA section 313 chemicals in mixtures or other trade name products that they send to their customers.

However, if these facilities receive notifications from their suppliers about EPCRA section 313 chemicals in mixtures or other trade name products, they should

forward the notifications with the EPCRA section 313 chemicals they send to other covered users.

An example would be if you sold a lacquer containing toluene to distributors who then may sell the product to other manufacturers. The distributors are not in a covered NAICS code, but because they sell the product to companies in covered NAICS codes, they must be notified so that they may pass the notice along to their customers, as required.

The language of the supplier notification requirements covers mixtures or other trade name products that are sold or otherwise distributed. The “otherwise distributes” language includes intra-company transfers and, therefore, the supplier notification requirements at 40 CFR Section 372.45 apply.

## D.3 Supplier Notification Content

The supplier notification must include the following information:

1. A statement that the mixture or other trade name product contains an EPCRA section 313 chemical or chemicals subject to the reporting requirements of EPCRA section 313 (40 CFR 372);
2. The name of each EPCRA section 313 chemical and the associated Chemical Abstracts Service (CAS) registry number of each chemical if applicable. (CAS numbers are not used for chemical categories, since they can represent several individual EPCRA section 313 chemicals.); and
3. The percentage, by weight, of each EPCRA section 313 chemical (or all EPCRA section 313 chemicals within a listed category) contained in the mixture or other trade name product.

For example, if a mixture contains a chemical (i.e., 12 percent zinc oxide) that is a member of a reportable EPCRA section 313 chemical category (i.e., zinc compounds), the notification must indicate that the mixture contains a zinc compound at 12 percent by weight. Supplying only the weight percent of the parent metal (zinc) does not fulfill the requirement. The customer must be told the weight percent of the entire compound within an EPCRA section 313 chemical category present in the mixture.

## D.4 How the Notification Must Be Made

The required notification must be provided at least annually in writing. Acceptable forms of notice include letters, product labeling, and product literature distributed to customers. If you are required to prepare and distribute a Material Safety Data Sheet (MSDS) for the mixture under the Occupational Safety and Health Act (OSHA) Hazard Communication Standard, your section 313 notification must be attached to the MSDS or the MSDS must be modified to include the required information. (A sample letter and recommended text for inclusion in an MSDS appear at the end of this appendix.)

You must make it clear to your customers that any copies or redistribution of the MSDS or other form of notification must include the section 313 notice. In other words, your customers should understand their requirement to include the section 313 notification if they give your MSDS to their customers.

## D.5 When Notification Must Be Provided

You must notify each customer receiving a mixture or other trade name product containing an EPCRA section 313 chemical with the first shipment of each calendar year. You may send the notice with subsequent shipments as well, but it is required that you send it with the first shipment each year. Once customers have been provided with an MSDS containing the section 313 information, you may refer to the MSDS by a written letter in subsequent years (as long as the MSDS is current).

If EPA adds EPCRA section 313 chemicals to the section 313 list, and your products contain the newly added EPCRA section 313 chemicals, notify your customers with the first shipment made during the next calendar year following EPA's final decision to add the chemical to the list. For example, if EPA adds chemical ABC to the list in September 1998, supplier notification for chemical ABC would have begun with the first shipment in 1999.

You must send a new or revised notice to your customers if you:

1. Change a mixture or other trade name product by adding, removing, or changing the percentage by weight of an EPCRA section 313 chemical; or
2. Discover that your previous notification did not properly identify the EPCRA section 313 chemicals in the mixture or correctly indicate the percentage by weight.

In these cases, you must:

1. Supply a new or revised notification within 30 days of a change in the product or the discovery of misidentified EPCRA section 313 chemical(s) in the mixture or incorrect percentages by weight; and
2. Identify in the notification the prior shipments of the mixture or product in that calendar year to which the new notification applies (e.g., if the revised notification is made on August 12, indicate which shipments were affected during the period January 1–August 12).

## D.6 When Notifications Are Not Required

Supplier notification is not required for a “pure” EPCRA section 313 chemical unless a trade name is used. The identity of the EPCRA section 313 chemical will be known based on label information.

You are not required to make a “negative declaration.” That is, you are not required to indicate that a product contains no EPCRA section 313 chemicals.

If your mixture or other trade name product contains one of the EPCRA section 313 chemicals, you are not required to notify your customers if:

1. Your mixture or other trade name product contains the EPCRA section 313 chemical in percentages by weight of less than the following levels (These are known as *de minimis* levels)
  - 0.1 percent if the EPCRA section 313 chemical is defined as an “OSHA carcinogen;”
  - 1 percent for other EPCRA section 313 chemicals.

*De minimis* levels for each EPCRA section 313 chemical and chemical category are listed in Table II. PBT chemicals (except lead when contained in stainless steel, brass or bronze alloys) are not eligible for the *de minimis exemption*. Therefore, *de minimis* levels are not provided for these chemicals in Table II. However, for purposes of supplier notification requirements only, such notification is not required when the following PBT chemicals are contained in mixtures below their respective *de minimis* levels:



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Chemical or chemical category name	CAS number or chemical category code	Supplier notification limit (%)
Aldrin	309-00-2	1.0
Benzo[g,h,i]perylene	191-24-2	1.0
Chlordane	57-74-9	0.1
Dioxin and dioxin-like compounds (manufacturing; and the processing or otherwise use of dioxin and dioxin-like compounds if the dioxin and dioxin-like compounds are present as contaminants in a chemical and if they were created during the manufacturing of that chemical)	N150	1.0*
Heptachlor	76-44-8	0.1
Hexachlorobenzene	118-74-1	0.1
Isodrin	465-73-6	1.0
Lead	7439-92-1	0.1
Lead compounds	N420	0.1**
Mercury	7439-97-6	1.0
Mercury compounds	N458	1.0
Methoxychlor	72-43-5	1.0
Octachlorostyrene	29082-74-4	1.0
Pendimethalin	40087-42-1	1.0
Pentachlorobenzene	608-93-5	1.0
Polychlorinated biphenyls (PCBs)	1336-36-3	0.1
Polycyclic aromatic compounds category	N590	0.1***
Tetrabromobisphenol A	79-94-7	1.0
Toxaphene	8001-35-2	0.1

Chemical or chemical category name	CAS number or chemical category code	Supplier notification limit (%)
Trifluralin	1582-09-8	1.0
<p>*The <i>de minimis</i> level is 1.0 for all members except for 2,3,7,8-Tetrachlorodibenzo-<i>p</i>-dioxin which has a 0.1% <i>de minimis</i> level.  **The <i>de minimis</i> level is 0.1 for inorganic lead compounds and 1.0 for organic lead compounds  ***The <i>de minimis</i> level is 0.1 except for benzo(a)phenanthrene, dibenzo(a,e)fluoranthene, benzo(j,k)fluorene, and 3-methylcholanthrene which are subject to the 1.0% <i>de minimis</i> level.</p>		

2. Your mixture or other trade name product is one of the following:
  - An article that does not release an EPCRA section 313 chemical under normal conditions of processing or otherwise use.
  - Foods, drugs, cosmetics, alcoholic beverages, tobacco, or tobacco products packaged for distribution to the general public.
  - Any consumer product, as the term is defined in the Consumer Product Safety Act, packaged for distribution to the general public. For example, if you mix or package one-gallon cans of paint designed for use by the general public, notification is not required.
3. A waste sent off site for further waste management. The supplier notification requirements apply only to mixtures and trade name products. They do not apply to wastes.
4. You are initiating distribution of a mixture or other trade name product containing one or more EPCRA section 313 chemicals and your facility is in any of the covered SIC codes added during the 1997 industry expansion rulemaking, including facilities whose SIC code is within SIC major group codes 10 (except 1011, 1081, and 1094), 12 (except 1241); industry codes 4911 (limited to facilities that combust coal and/or oil for the purpose of generating power for distribution in commerce), 4931 (limited to facilities that combust coal and/or oil for the purpose of generating power for distribution in commerce), or 4939 (limited to facilities that combust coal and/or oil for the purpose of generating power for distribution in commerce); or 4953 (limited to facilities regulated under the

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Resource Conservation and Recovery Act, subtitle C, 42 U.S.C. Section 6921 et seq.) or 5169, or 5171, or 7389 (limited to facilities primarily engaged in solvents recovery services on a contract or fee basis).

### D.7 Trade Secrets

Chemical suppliers may consider the chemical name or the specific concentration of an EPCRA section 313 chemical in a mixture or other trade name product to be a trade secret. If they consider:

1. The specific identity of an EPCRA section 313 chemical to be a trade secret, the notice must contain a generic chemical name that is descriptive of the structure of that EPCRA Section 313 chemical (for example, decabromodiphenyl oxide could be described as a halogenated aromatic);
2. The specific percentage by weight of an EPCRA section 313 chemical in the mixture or other trade name product to be a trade secret, the notice must contain a statement that the EPCRA section 313 chemical is present at a concentration that does not exceed a specified upper bound. For example, if a mixture contains 12 percent toluene and you consider the percentage a trade secret, the notification may state that the mixture contains toluene at no more than 15 percent by weight. The upper

bound value chosen must be no larger than necessary to adequately protect the trade secret.

If you claim this information to be trade secret, you must have documentation that provides the basis for your claim.

### D.8 Recordkeeping Requirements

You are required to keep records of the following for three years:

1. Notifications sent to recipients of your mixture or other trade name product;
2. All supporting materials used to develop the notice;
3. If claiming a specific EPCRA section 313 chemical identity a trade secret, you should record why the EPCRA section 313 chemical identity is considered a trade secret and the appropriateness of the generic chemical name provided in the notification; and
4. If claiming a specific concentration a trade secret, you should record explanations of why a specific concentration is considered a trade secret and the basis for the upper bound concentration limit.

Information retained under 40 CFR 372 must be readily available for inspection by EPA.

## **D.9 Sample Notification Letter**

January 2, 2009

Mr. Edward Burke  
Furniture Company of North Carolina  
1000 Main Street  
Anytown, North Carolina 99999

Dear Mr. Burke:

This letter is to inform you that a product that we sell to you, Furniture Lacquer KXZ-1390, contains one or more chemicals subject to section 313 of Emergency Planning and Community Right-to-Know Act (EPCRA). We are required to notify you of the presence of these chemicals in the product under EPCRA section 313. This law requires certain industrial facilities to report on annual emissions and other waste management of specified EPCRA section 313 chemicals and chemical categories. Our product contains:

Toluene, Chemical Abstract Service (CAS) number 108-88-3, 20 percent, and

Zinc compounds, 15 percent.

If you are unsure whether you are subject to the reporting requirements of EPCRA section 313, or need more information, call the EPA/TRI Information Center. For contact information, please see the TRI Home Page at <http://www.epa.gov/tri>. Your other suppliers should also be notifying you about EPCRA section 313 chemicals in the mixtures and other trade name products they sell to you.

Finally, please note that if you repackage or otherwise redistribute this product to industrial customers, a notice similar to this one should be sent to those customers.

Sincerely,

Emma Sinclair  
Sales Manager  
Furniture Products

## D.10 Sample Notification on an MSDS Furniture Products

Section 313 Supplier Notification

This product contains the following EPCRA section 313 chemicals subject to the reporting requirements of section 313 of the Emergency Planning and Community Right-To-Know Act of 1986 (40 CFR 372):

<u>CAS Number</u>	<u>Chemical Name</u>	<u>Percent by Weight</u>
108-88-3	Toluene	20%
NA	Zinc Compounds	15%

This information must be included in all MSDSs that are copied and distributed for this material.



**Material Safety Data Sheet**

## Appendix E. TRI State and Tribal Contacts

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EPCRA Section 313 requires facilities to submit reports to both EPA and their state or tribe (if located in Indian country as defined by 18 USC §1151). For a current list of state and tribal designated Section 313 contacts, see the TRI web site at:

- State TRI Contact Information:  
<http://www2.epa.gov/toxics-release-inventory-tri-program/tri-state-contacts>
- Tribal TRI Contact Information:  
<http://www2.epa.gov/toxics-release-inventory-tri-program/tri-tribal-contacts>

## Appendix F. TRI Regional Contacts

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### Region 1 (CT, ME, MA, NH, RI, and VT)

Dwight Peavey  
Office of Environmental Stewardship  
USEPA Region 1 (OES05-1)  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912  
(617) 918-1829; fax: (617) 918-0829  
peavey.dwight@epa.gov

### Region 2 (NJ, NY, PR, and VI)

Nora Lopez  
Pesticides and Toxic Substances Branch  
USEPA Region 2 (MS-105)  
2890 Woodbridge Avenue, Building 10  
Edison, NJ 08837-3679  
(732) 906-6890; fax: (732) 321-6788  
lopez.nora@epa.gov

### Region 3 (DE, DC, MD, PA, VA, and WV)

William Reilly  
Toxics Programs and Enforcement Branch  
USEPA Region 3 (3LC61)  
1650 Arch Street  
Philadelphia, PA 19103-2029  
(215) 814-2072; fax: (215) 814-3114  
reilly.william@epa.gov

### Region 4 (AL, FL, GA, KY, MS, NC, SC, TN)

Ezequiel Velez  
Air Toxics & Monitoring Branch  
Air Toxics Assessment & Implementation  
Section  
USEPA Region 4 (9T25)  
61 Forsyth Street, S.W.  
Atlanta, GA 30303-8960  
(404) 562-9191; fax: (404) 562-9163  
velez.ezequiel@epa.gov

### Region 5 (IL, IN, MI, MN, OH, and WI)

Bradley Grams  
Land and Chemicals Division  
USEPA Region 5 (LC-8J)  
77 West Jackson Boulevard  
Chicago, IL 60604  
(312) 886-7747; fax: (312) 697-2527  
grams.bradley@epa.gov

### Region 6 (AR, LA, NM, OK, and TX)

Morton Wakeland  
Toxics Section, Multimedia Planning and  
Permitting Division  
USEPA Region 6 (6PD-T)  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733  
(214) 665-8116; fax: (214) 665-6655  
wakeland.morton@epa.gov

### Region 7 (IA, KS, MO, and NE)

Stephen Wurtz  
Toxics Release Inventory Coordinator  
USEPA Region 7 (AWMD/CRIB)  
11201 Renner Blvd  
Lenexa, KS 66219  
(913) 551-7315; fax: (913) 551-7065  
wurtz.stephen@epa.gov

### Region 8 (CO, MT, ND, SD, UT, and WY)

Barbara Conklin  
Toxics Release Inventory Program  
USEPA Region 8 (8P-P3T)  
1595 Wynkoop Street  
Denver, CO 80202  
(303) 312-6619; fax: (303) 312-6044  
conklin.barbara@epa.gov

### Region 9 (AS, AZ, CA, GU, HI, MH, MP, and NV)

Russell Frazer  
Toxics Release Inventory Program  
USEPA Region 9 (ENF-2-1)  
75 Hawthorne Street  
San Francisco, CA 94105-3901  
(415) 947-4220; fax: (415) 947-3583  
frazer.russell@epa.gov

### Region 10 (AK, ID, OR, and WA)

Tony Davis  
Inspections & Enforcement Management Unit  
USEPA Region 10 (OCE-184)  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140  
(206) 553-8322; fax: (206) 553-7176  
davis.tony@epa.gov

# Appendix G. Other Relevant Section 313 Materials

## G.1 TRI National Analysis

### Toxics Release Inventory National Analysis

EPA summarizes the latest TRI data in a report called the TRI National Analysis. The National Analysis is an annual report that includes information about toxic chemical releases to the environment, how toxic chemicals are managed at TRI facilities (i.e. recycled, treated and burned for energy), and how facilities are working to reduce toxic chemicals they generate and release. The TRI National Analysis Overview document includes national trends and figures, while other websites linked from the National Analysis homepage include more localized analyses of states, certain urban areas and watersheds. The National Analysis homepage can be accessed at: [www.epa.gov/tri/NationalAnalysis](http://www.epa.gov/tri/NationalAnalysis).

To conduct your own analysis, TRI data collected from 1987 through 2013 can be accessed using the TRI Explorer online tool:

<http://www.epa.gov/triexplorer>, as well as several other public access tools available on the TRI website at: <http://www.epa.gov/tri/tridata/index.htm>.

## G.2. Access to TRI Information On-line

The **TRI Home Page** <http://www.epa.gov/tri> offers information useful to both novice and experienced users of the Toxics Release Inventory. It provides a description of what the TRI database is and how it can be used; access to TRI data; TRI regulations; and guidance documents for complying with TRI regulations and using TRI data. You can find out about TRI products, view or download the 2013 TRI reports, and identify who to contact for more information in EPA regions and state programs across the country. From the TRI home page, you can link to other EPA and non-EPA sites that also allow you to search the TRI database and other databases online.

**TRI Explorer** <http://www.epa.gov/triexplorer> is an on-line tool that EPA has created to obtain TRI data. It allows the user to search the TRI database using six criteria: facility, chemical, year or industry type (NAICS code), federal facility and geographic area (at the county, state or national level). The tool will generate three types of reports: (1) Release Reports (including on- and off-site releases (i.e., off-site releases include transfers off-site to disposal and

metals and metal compounds transferred to POTWs)); (2) Waste Transfer Reports (including amounts transferred off-site for further waste management but not including transfers off-site to disposal); and (3) Waste Quantity Reports (including amounts recycled, burned for energy recovery, quantities treated, and quantities released).

**TOXNET** <http://toxnet.nlm.nih.gov> the National Library of Medicine's (NLM) Toxicology Data Network, provides free access to several databases, including the TRI database, that provides a variety of information on toxic chemicals. As with EPA's TRI Explorer tool, users of TOXNET can search by chemical or other name, chemical name fragment, or Chemical Abstracts Service Registry Number. Also searchable are facility or parent company name, state, city, county, or zip code. Search results can be limited to releases greater than a specified number of pounds, and individual releases can be summed together to display a total amount. Toxicity and environmental fate data for thousands of chemicals are also available from TOXNET.

## G.3 Other TRI Information

**EPA's Integrated Risk Information System (IRIS)** <http://www.epa.gov/iris> is an electronic database containing information on human health effects that may result from exposure to various chemicals, including TRI chemicals, in the environment. IRIS was initially developed for EPA staff in response to a growing demand for consistent information of chemical substances for use in risk assessments, decision-making and regulatory activities. The information in IRIS is intended for those without extensive training in toxicology, but with some knowledge of health sciences.

**Consolidated List of Chemicals Subject to the Emergency Planning and Community Right-to-Know Act and Section 112(r) of the Clean Air Act (List of Lists), (October 2012):**

[http://www.epa.gov/emergencies/docs/chem/list\\_of\\_lists.pdf](http://www.epa.gov/emergencies/docs/chem/list_of_lists.pdf)

**The Pollution Prevention Information Clearinghouse (PPIC)**

<http://www.epa.gov/oppt/ppic/index.html> PPIC was established as part of EPA's response to the Pollution Prevention Act of 1990, which directed the Agency to compile information, including a database, on management, technical, and operational

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approaches to source reduction. PPIC provides information to the public and industries involved in conservation of natural resources and in reduction or elimination of pollutants in facilities, workplaces, and communities.

To request EPA information on pollution prevention or obtain fact sheets on pollution prevention from various state programs call the PPIC reference and referral service at 202 566-0799, or fax a request to 202 566-0794, or write to:

U.S. EPA  
Pollution Prevention Information Clearinghouse  
(PPIC)  
EPA West  
1200 Pennsylvania Ave. NW  
Room 3379 (Mail Code 7407-T)  
Washington, DC 20460-0001  
Email: [ppic@epa.gov](mailto:ppic@epa.gov)



# Appendix H. Guidance Documents

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## H.1 General Guidance

Many of the TRI guidance documents are available via the Internet <http://www.epa.gov/tri>.

- **40 CFR 372, Toxic Chemical Release Reporting; Community Right-to-Know; Final Rule**

A reprint of the final EPCRA section 313 rule as it appeared in the *Federal Register* (FR) February 16, 1988 (53 FR 4500) (OTSFR 021688).

- **Common Synonyms for Chemicals Listed Under Section 313 of the Emergency Planning and Community Right-to-Know Act**

March 1995 (EPA 745R-95-008)

This glossary contains chemical names and their synonyms for substances covered by the reporting requirements of EPCRA section 313. The glossary was developed to aid in determining whether a facility manufactures, processes, or otherwise uses a chemical subject to EPCRA section 313 reporting.

- **EPCRA Section 313 Questions and Answers - Revised 1998 Version**

December 1998 (EPA 745-B-98-004)

The revised 1998 *EPCRA Section 313 Questions and Answers* document assists regulated facilities in complying with the reporting requirements of EPCRA section 313. This updated document presents interpretive guidance in the form of answers to many commonly asked questions on compliance with EPCRA section 313. In addition, this document includes comprehensive written directives to assist covered facilities in understanding some of the more complicated regulatory issues. This updated guidance document is intended to supplement the instructions for completing the Form R and the Alternate Threshold Certification Statement (Form A).

- **EPCRA Section 313 Questions and Answers - Addendum to the Revised 1998 Version**

December 2004 (EPA-260-B-04-002)

As a result of Executive Order 13148, regulatory actions, and legal decisions over the past five years, some of the Qs & As contained in the 1998 Q & A Document were updated. The 1998 Q & A Document remains valid guidance in all other respects.

- **EPCRA Section 313 Questions and Answers Addendum for Federal Facilities**

May 2000 (EPA 745-R-00-003)

This document is an addendum to the EPCRA section 313 Questions and Answers: Revised 1998 Version. It provides additional assistance to federal facilities in complying with EPCRA section 313. Federal facilities, which are subject to compliance under EPCRA through Executive Order 13423, frequently have operations that are different from the private sector facilities subject to EPCRA. The document contains questions and answers that address some of those differences.

- **EPCRA Section 313 Release and Other Waste Management Reporting Requirements**

February 2001 (EPA 260/K-01-001)

The brochure alerts businesses to their reporting obligations under EPCRA section 313 and assists in determining whether their facility is required to report. The brochure contains the EPA regional contacts, the list of EPCRA section 313 toxic chemicals and a description of the Standard Industrial Classification (SIC) codes subject to EPCRA section 313.

- **Toxic Chemical Release Reporting Using 2007 North American Industry Classification System (NAICS) Final Rule (73 FR 32466; June 9, 2008):** This final rule incorporates 2007 Office of Management and Budget (OMB) revisions and other corrections to the NAICS codes used for TRI Reporting.

- **Toxic Chemical Release Reporting Using North American Industry Classification System (NAICS) Final Rule (71 FR 32464; June 6, 2006):** With this rulemaking, Toxics Release Inventory (TRI) reporting will require North American Industry Classification System (NAICS) codes in place of Standard Industrial Classification

(SIC) codes. North American Industry Classification System (NAICS), United States, 2002, Executive Office of the President, Office of Management and Budget, NTIS Order Number: PB2002-101430

- **Persistent Bioaccumulative Toxic (PBT) Chemicals; Final Rule (64 FR 58666)**

A reprint of the final rule that appeared in the *Federal Register* of October 29, 1999. This rule adds certain PBT chemicals and chemical categories for reporting year 2000 and beyond under EPCRA section 313, lowers their activity thresholds and modifies certain reporting exemptions and requirements for PBT chemicals and chemical categories. In a separate action, as part of the October 29, 1999 rulemaking, EPA added vanadium (except when contained in alloy) and vanadium compounds. These are not listed as PBT chemicals.

## H.2 Supplier Notification Requirements

(EPA 560-4-91-006)

This pamphlet assists chemical suppliers who may be subject to the supplier notification requirements, gives examples of situations which require notification, describes the trade secret provision, and contains a sample notification.

- **Toxic Chemical Release Inventory Reporting Forms and Instructions Revised 2006 Version**  
February 2007 (EPA 260-C-06-901)

- **Toxics Release Inventory: Reporting Modifications Beginning with 1995 Reporting Year**  
February 1995 (EPA 745-R-95-009)

- **Trade Secrets Rule and Substantiation Form**

- (53 FR 28772)

A reprint of the final rule that appeared in the *Federal Register* of July 29, 1988. This rule implements the trade secrets provision of the Emergency Planning and Community Right-to-Know Act (section 322). The current trade secret substantiation form can be accessed at <http://www.epa.gov/tri/report/index.htm#forms>

## H.3 Chemical-Specific Guidance

EPA has developed a group of guidance documents specific to individual chemicals and chemical categories.

- **Emergency Planning and Community Right-to-Know Section 313: List of Toxic Chemicals within the Chlorophenols Category**  
June 1999 (EPA745-B-99-013)

- **Toxics Release Inventory List of Toxic Chemicals within the Glycol Ethers Category and Guidance for Reporting**  
December 2000 (EPA745-R-00-004)

- **Emergency Planning and Community Right-to-Know Act Section 313: Guidance for Reporting Hydrochloric Acid (acid aerosols including mists, vapors, gas, fog and other airborne forms of any particle size)**  
December 1999 (EPA 745-B-99-014)

- **Emergency Planning and Community Right-to-Know Act - Section 313: Guidance for Reporting Releases and Other Waste Management Activities of Toxic Chemicals: Lead and Lead Compounds**  
November 2001 (EPA-260-B-01-027)

- **Emergency Planning and Community Right-to-Know Act - Section 313: Guidance for Reporting Toxic Chemicals: Mercury and Mercury Compounds Category**  
August 2001 (EPA 260-B-01-004)

- **Toxics Release Inventory List of Toxic Chemicals within the Nicotine and Salt Category and Guidance for Reporting**  
June 1999 (EPA 745-R-99-010)

- **Toxics Release Inventory List of Toxic Chemicals within the Water Dissociable Nitrate Compounds Category and Guidance for Reporting**  
December 2000 (EPA 745-R-00-006)
- **Emergency Planning and Community Right-to-Know Act - Section 313: Guidance for Reporting Toxic Chemicals: Pesticides and Other Persistent Bioaccumulative Toxic (PBT) Chemicals**  
August 2001 (EPA 260-B-01-005)
- **Toxics Release Inventory List of Toxic Chemicals within the Polychlorinated Alkanes Category and Guidance for Reporting**  
June 1999 (EPA 745-B-99-023)
- **Emergency Planning and Community Right-to-Know Act - Section 313: Guidance for Reporting Toxic Chemicals: Polycyclic Aromatic Compounds Category**  
August 2001 (EPA 260-B-01-003)
- **Toxics Release Inventory List of Toxic Chemicals within the Strychnine and Salts Category and Guidance for Reporting**  
June 1999 (EPA 745-R-99-011)
- **Emergency Planning and Community Right-to-Know Act Section 313: Guidance for Reporting Sulfuric Acid** (acid aerosols including mists, vapors, gas, fog and other airborne forms of any particle size)  
March 1998 (EPA 745-R-97-007)
- **Toxics Release Inventory List of Toxic Chemicals within Warfarin Category**  
June 1999 (EPA 745-B-99-011)
- **Toxics Release Inventory List of Toxic Chemicals within Ethylenebisdithiocarbamic Acid, Salts and Esters Category and List of Mixtures that Contain the Individually listed Chemicals Maneb, Metiram, Nabam, and Zineb**  
September 2001 (EPA 260-B-01-026)
- **Emergency Planning and Community Right-to-Know Act - Section 313: Guidance for Reporting Aqueous Ammonia**  
December 2000 (EPA 745-R-00-005)
- **Emergency Planning and Community Right-to-Know Act - Section 313: Guidance for Reporting Toxic Chemicals within the Dioxin and Dioxin-like Compounds Category**  
December 2000 (EPA 745-B-00-021)

## **H.4 Industry-Specific Guidance**

EPA has developed specific guidance documents for certain industries.

- **EPCRA Section 313: Guidance for Chemical Distribution Facilities**  
January 1999 (EPA 745-B-99-005)
- **EPCRA Section 313: Guidance for Petroleum Terminals and Bulk Storage Facilities**  
February 2000 (EPA 745-B-00-002)
- **EPCRA Section 313: Guidance for Coal Mining Facilities**  
February 2000 (EPA 745-B-00-003)
- **EPCRA Section 313: Guidance for Electricity Generating Facilities**  
February 2000 (EPA 745-B-00-004)

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- **EPCRA Section 313 Reporting Guidance for Food Processors**  
September 1998 (EPA 745-R-98-011)
- **EPCRA Section 313 Reporting Guidance for the Leather Tanning and Finishing Industry**  
April 2000 (EPA 745-B-00-012)
- **EPCRA Section 313: Guidance for Metal Mining Facilities**  
January 1999 (EPA 745-B-99-001)
- **Emergency Planning and Community Right-to-Know Act Section 313 Reporting Guidance for the Presswood and Laminated Products Industry**  
August 2001 (EPA 260-B-01-013)
- **EPCRA Section 313 Reporting Guidance for the Printing, Publishing, and Packaging Industry**  
May 2000 (EPA 745-B-00-005)
- **EPCRA Section 313: Guidance for RCRA Subtitle C TSD Facilities and Solvent Recovery Facilities**  
January 1999 (EPA 745-B-99-004)
- **EPCRA Section 313 Reporting Guidance for Rubber and Plastics Manufacturing**  
May 2000 (EPA 745-B-00-017)
- **EPCRA Section 313 Reporting Guidance for Semiconductor Manufacturing**  
July 1999 (EPA 745-R-99-007)
- **EPCRA Section 313 Reporting Guidance for the Textile Processing Industry**  
May 2000 (EPA 745-B-00-008)
- **EPCRA Section 313 Reporting Guidance for Spray Application and Electrodeposition of Organic Coatings**  
December 1998 (EPA 745-R-98-014)

# Appendix I. Questions and Answers Regarding Facility Identification Information

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## I.1 Categories

This document provides additional information about TRI reporting procedures based on some frequently asked questions. The questions and their answers are organized into three groups:

- Section I.2 Identifying the parent company.
- Section I.3 Reporting after a change in name or ownership.
- Section I.4 Reporting for multiple sites and/or owners.

## I.2 Identifying the Parent Company

### A. Question

When a facility changes ownership after a Form R has been submitted, who is required to respond to a Notice of Noncompliance (NON) related to the Form R? Is the current or prior owner/operator required to respond to the NON?

### A. Answer

The current owner/operator has the primary responsibility for responding to a NON. However, all prior owners/operators back to January 1 of the reporting year may also be held responsible if the current owner/operator does not respond to the NON in an accurate, complete, and timely manner.

(Source: 1998 EPCRA Section 313 Questions and Answers Document, Question #52 (EPA 745-B-98-004)).

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### B. Question

Who is the parent company for a 50/50 joint venture?

### B. Answer

The 50/50 joint venture is its own parent company.

(Source: 1998 EPCRA Section 313 Questions and Answers Document, Question #54 (EPA 745-B-98-004)).

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### C. Question

Mom and Pop Plastics is a wholly owned subsidiary of a major chemical company which is a wholly owned subsidiary of Big Oil Corporation, located in St. Paul, Minnesota. Which is the parent company?

### C. Answer

Big Oil Corporation is the parent company.

(Source: 1998 EPCRA Section 313 Questions and Answers Document, Question #56 (EPA 745-B-98-004)).

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## I.3 Reporting After a Change in Name or Ownership

### A. Question

The owner/operator of a covered facility is preparing Form Rs for a facility. The facility and its parent company both changed their names after the reporting year. What names should be reported by the owner/operator (for both the facility and the parent company) on the Form Rs covering the reporting year?

### A. Answer

The facility should report the names used by the facility and parent company during that reporting year. When the owner/operator submits Form Rs for the next reporting year, these reports should reflect the names used by the facility and parent company during the new reporting year. Note that the TRI facility identification number will not change.

(Source: 1998 EPCRA Section 313 Questions and Answers Document, Question #614 (EPA 745-B-98-004)).

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### B. Question

If a covered facility does not have a Dun & Bradstreet (D&B) number but the parent corporation does, should this number be reported?

### B. Answer

Report the D&B number for the facility. If a facility does not have a D&B number, enter "NA" in Part I, Section 4.7. The corporate D&B number should be entered in Part I, Section 5.2 relating to parent company information.

(Source: 1998 EPCRA Section 313 Questions and Answers Document, Question #621 (EPA 745-B-98-004)).

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### C. Question

In October 2009, Facility X changes ownership and is purchased by Company Y. For the 2009 reporting year, which facility is obligated to submit the Form R or Form A, and whose name and what TRI identification number should be on the form?

### C. Answer

The owner or operator of the facility on the annual July 1 reporting deadline (i.e., Company Y) is primarily responsible for reporting the data for the entire previous

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year's operations at that facility. Any other owner or operator of the facility before the reporting deadline may also be held liable. The form submitted for a given reporting year must reflect the names used by the facility and its parent company on December 31 of that reporting year, even if the facility changed its name or ownership at any time during the reporting year. In this scenario, because Facility X changed ownership before December 31 of the reporting year, Company Y's name should appear on the form. The TRI identification number is location-specific; thus, the identification number will stay the same even if the facility changes names, production processes, or NAICS codes.

(Source: Monthly Call Center Report Question EPA530-R-98---5j; October 1998).

## I.4 Reporting for Multiple Sites and/or Owners

### A. Question

If two plants are separate establishments under the same site management, must they have separate D&B numbers?

### A. Answer

They may have separate D&B numbers, especially if they are distinctly separate business units. However, different divisions of a company located at the same facility usually do not have separate D&B numbers.

(Source: 1998 EPCRA Section 313 Questions and Answers Document, Question #622 (EPA 745-B-98-004)).

### B. Question

An electricity generating facility (EGF) is comprised of multiple independent owners. Each individual owner runs his/her own separate operation, but each has a financial interest in the operation of the entire facility. What name should be entered as the parent company in Part I, Section 5.1 of the Form R? Should the facility report under one holding company name?

### B. Answer

The EGF should enter in Part I, Section 5.1 of the Form R the name of the holding or parent company, consortium, joint venture, or other entity that owns, operates, or controls the facility.

(Source: Question #2, Addendum to the Guidance Documents for the Newly Added Industries (EPA 745-B-98-001)).

### C. Question

A covered facility sells one of its establishments to a new owner. The operator of the newly sold establishment, however, does not change. The same operator operates

the newly sold establishment and the rest of the facility. Although the facility makes its threshold determinations based on the activities at the entire facility (including the newly sold establishment), the facility chooses to report separately for the different establishments. What parent name should the newly sold establishment use, the parent name of the owner or the parent name of the operator (i.e., the same as the rest of the facility)?

### C. Answer

All establishments of a covered facility must report the parent name of the facility. Therefore, in the instance described above, the newly sold establishment should use the parent name of the facility operator (i.e., the same parent name the rest of the facility is using).

(Source: Spring Training 1998).

### D. Question

Company A purchases a facility from Company B between January 1, 2006 and June 30, 2006. For the 2005 reporting year, which company's name and identification number should appear on the Form R or Form A submission?

### D. Answer

In the case that a facility is purchased between January 1 and June 30, the form submitted for the previous year must reflect the name used by the facility on December 31 of that reporting year. In this example, company B's name should appear on the form because it owned the facility for the duration of the reporting year. The TRI identification number is location-specific; thus, the identification number will stay the same even if the facility changes names, production processes, or NAICS codes.

With regard to reporting, the owner or operator of the facility on the annual July 1 reporting deadline (Company A) is primarily responsible for reporting the data for the previous year's operations at that facility. However, all prior owners and operators back to January 1 of the year covered in the report may also be held responsible if the current owner or operator does not submit a report.

(Source: Monthly Call Center Report Question EPA530-R-98---5j; October 1998)

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### **E. Question**

Two distinct NAICS code operations that are covered under EPCRA Section 313 (e.g., an electricity generating unit and a cement plant) are located on adjacent properties and are owned by the same parent company. The two operations are operated completely independently of one another (e.g., separate accounting procedures, employees, etc.). Are these two operations considered one facility under EPCRA Section 313?

### **E. Answer**

Yes. Under EPCRA Section 313, a facility is defined as, “all buildings, equipment, structures, and other stationary items which are located on a single site or on contiguous or adjacent sites and which are owned or operated by the same person.” Because these two operations are located on adjacent properties and are owned by the same person they are considered one facility for EPCRA Section 313 reporting purposes. Additional information can be found in the 2009 Toxic Release Inventory Reporting Forms and Instructions.

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### **F. Question**

A piece of contiguous property consists of three covered sites with various buildings, structures and equipment. The three sites are owned by two different companies – Company A and Company B. All three sites operate completely independently of each other and have separate personnel, finances, and environmental reporting systems. Site 1 and its buildings and structures are owned and operated by Company A and site 3 and its buildings and structures are owned and operated by Company B. The middle site, site 2 and its surrounding buildings and structures, are owned by Company A and

operated by Company B. Are all three sites and their buildings and structures considered separate facilities under EPCRA Section 313? Who is responsible for reporting for each?

### **F. Answer**

Under 40 CFR Section 372.3 a facility is defined as “all buildings, equipment, structures, and other stationary items which are located on a single site or on contiguous or adjacent sites and which are owned or operated by the same person.” Because all buildings and structures located on sites 1 and 2 are located on contiguous property and are owned by the same person, they are considered one facility. Because all buildings and structures located on sites 2 and 3 are located on contiguous property and are operated by the same person, they are also considered one facility. Therefore, for purposes of determining thresholds, the toxic chemicals manufactured, processed, and otherwise used at site 2 must be counted toward both Facility A’s and Facility B’s threshold determinations. Because the operator is primarily responsible for reporting, estimating and reporting releases and other waste management calculations for sites 2 and 3 are the primary responsibility of Company B, and the release and other waste management reporting for site 1 is the primary responsibility of Company A. EPA allows the release and other waste management reporting to be done in this manner to avoid “double counting” releases and waste management activities at site 2. However, provided thresholds have been exceeded, if no reports are received from a covered facility, determinations can be found in the 2009 Toxic Release Inventory Reporting Forms and Instructions.