

## Appendix A. TRI Federal Facility Reporting Information

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### Special Instructions for TRI Federal Facility Reporting

#### A.1 *Why Do Federal Facilities Need to Report?*

In 1993, Executive Order 12856, “Federal Compliance With Right-To-Know Laws and Pollution Prevention Requirements,” required 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). Subsequent Executive Orders have not changed this requirement. 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 Orders for federal facilities reporting to TRI, please refer to the implementing instructions which can be found on the TRI web page: <https://www.epa.gov/toxics-release-inventory-tri-program/tri-laws-rulemakings-and-notice>.

#### 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:

US 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:

US 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:

US 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: <https://www.epa.gov/toxics-release-inventory-tri-program/training>.

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.

- 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

## **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: [https://ofmpub.epa.gov/apex/guideme\\_ext/f?p=guideme:gd:::::gd:1999ff](https://ofmpub.epa.gov/apex/guideme_ext/f?p=guideme:gd:::::gd:1999ff).

## **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 Other General Government Support

#### **922 Justice, Public Order, and Safety Activities**

- 92211 Courts

**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 Ethylenedithiocarbamic 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

Range Code	Range (pounds)	
	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

### 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

Total Release or Transfer	
Code	Range (pounds)
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.
- 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 Disposal (POTW)

- P30 Discharged to Water Stream  
 P31 Discharged to Other Activities  
 P32 Released to Air  
 P33 Sludge to disposal  
 P34 Sludge to incineration  
 P35 Sludge to agricultural applications  
 P36 Other or Unknown Disposal

#### 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
- 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)
- T02 External Pollution Prevention Opportunity Audit(s)
- T03 Materials Balance Audits
- T04 Participative Team Management
- T05 Employee Recommendation (independent of a formal company program)
- T06 Employee Recommendation (under a formal company program)
- T07 State Government Technical Assistance Program
- T08 Federal Government Technical Assistance Program
- T09 Trade Association/Industry Technical Assistance Program
- T10 Vendor Assistance
- 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

## 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

<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).

## 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.

## 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.

Energy Recovery Code for Section 7B	Parent Metals	Metal Category Compounds	Metals with Qualifiers	Individually-listed Metal Compounds
U01, U02, U03	None	None	None	All except Asbestos <sup>1</sup>

<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.

### 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

### 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>1</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. Supplier Notification Requirements

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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.

### ***C.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 fulltime 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.

### ***C.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.

### ***C.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.

#### **C.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 Safety Data Sheet (SDS) for the mixture under the Occupational Safety and Health Act (OSHA) Hazard Communication Standard, your section 313 notification must be attached to the SDS or the SDS must be modified to include the required information. (A sample letter and recommended text for inclusion in an SDS appear at the end of this appendix.)

You must make it clear to your customers that any copies or redistribution of the SDS 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 SDS to their customers.

#### **C.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 SDS containing the section 313 information, you may refer to the SDS by a written letter in subsequent years (as long as the SDS 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).

#### **C.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:

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

Chemical or chemical category name	CAS number or chemical category code	Supplier notification limit (%)
Toxaphene	8001-35-2	0.1
Trifluralin	1582-09-8	1.0

\*The *de minimis* level is 1.0 for all members except for 2,3,7,8-Tetrachlorodibenzo-*p*-dioxin which has a 0.1% *de minimis* level.

\*\*The *de minimis* level is 0.1 for inorganic lead compounds and 1.0 for organic lead compounds

\*\*\*The *de minimis* 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% *de minimis* level.

- 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.
- 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.
- 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 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).

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.

### ***c.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.

### ***c.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

Information retained under 40 CFR 372 must be readily available for inspection by EPA.



**C.9 Sample Notification Letter**

January 2, 2017

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 KXZ1390, 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

C.10 **Sample Notification on an Example SDS****Section 15 – Regulatory Information**

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 SDSs that are copied and distributed for this material.

**Safety Data Sheet**

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## Appendix D. TRI State, Tribal, and Regional 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). TRI coordinators are also designated for each EPA region to assist with TRI matters within their region. For a current list of state, tribal, and regional designated section 313 contacts, see the TRI website at:

- State TRI Contact Information:  
<http://www.epa.gov/toxics-release-inventory-tri-program/tri-state-contacts>
- Tribal TRI Contact Information:  
<http://www.epa.gov/toxics-release-inventory-tri-program/tri-tribal-contacts>
- Regional TRI Coordinator Information:  
<http://www.epa.gov/toxics-release-inventory-tri-program/tri-regional-coordinators>

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## Appendix E. Guidance Documents

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### E.1 General Guidance

Many of the TRI guidance documents are available via EPA's GuideME application at <https://www.epa.gov/toxics-release-inventory-tri-program/guidance-documents>

- **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 13693, 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.

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- **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.

## **E.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>

## **E.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 (EPA 745-B-99-013)
- **Toxics Release Inventory List of Toxic Chemicals within the Glycol Ethers Category and Guidance for Reporting**  
December 2000 (EPA 745-R-00-004)

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- **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)

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- **Emergency Planning and Community Right-to-Know Act - Section 313: Guidance for Reporting Toxic Chemicals within the Dioxin and Dioxin-like Compounds Category**  
August 2017 (EPA 745-B-00-021)

#### ***E.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)
- **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 F. Questions and Answers Regarding Facility Identification Information

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### F.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 F.2** Identifying the parent company.

**Section F.3** Reporting after a change in name or ownership.

**Section F.4** Reporting for multiple sites and/or owners.

### F.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)).

### F.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)).



**C. Question**

In October 2015, Facility X changes ownership and is purchased by Company Y. For the 2015 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 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).

**F.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: 1998 EPCRA Section 313 Questions and Answers Document, Question #625 (EPA 745-B-98-004)).

**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: 1998 EPCRA Section 313 Questions and Answers Document, Question #626 (EPA 745-B-98-004)).

**D. 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?

**D. 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 Toxic Release Inventory Reporting Forms and Instructions.

(Source: 1998 EPCRA Section 313 Questions and Answers Document, Question #9 (EPA 745-B-98-004)).

**E. Question**

Company A purchases a facility from Company B between January 1, 2015 and June 30, 2015. For the 2015 reporting year, which company’s name and identification number should appear on the Form R or Form A submission?

**E. 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: 1998 EPCRA Section 313 Questions and Answers Document, Question #52 (EPA 745-B-98-004)).

**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 2015 Toxic Release Inventory Reporting Forms and Instructions.

(Source: 1998 EPCRA Section 313 Questions and Answers Document, Question #59 (EPA 745-B-98-004)).

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## Appendix G. Trade Secret Submissions

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### G.1 Instructions for Trade Secret Submissions

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. Trade secret reporting must be done via hard-copy, paper reporting.

The current substantiation form is available on the TRI website at: <https://www.epa.gov/toxics-release-inventory-tri-program/trade-secret-reporting>. 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.

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. These reporting forms can be found on the TRI website: <https://www.epa.gov/toxics-release-inventory-tri-program/reporting-forms-and-instructions>.

E-mailed submissions will not be accepted.

#### Form R Reporting

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.

#### Form A Reporting

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.

#### All Submissions

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 D).

### 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

### Revising or withdrawing trade secret submissions

Revisions and withdrawals must be performed using paper forms.

### 6.2 Supplemental Form R and Form A Instructions

The sections below are supplemental instructions to Chapters C and D for completing hard copy forms submitted with a trade secret submission.

## Part I. Facility Identification Information

### Section 2. Trade Secret Information

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

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. If you

checked "no," you should submit your non-trade secret form data electronically using TRI-MEweb.

If facilities wish to report more than one eligible chemical on the same Form A, then all chemicals included must be non-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.

#### 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."

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

Facilities filing a trade secret paper form should leave a blank in the BIA field if the facility is not located within tribal boundaries.

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

Enter your TRIFID in Part I, Section 4.1.

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

If your facility has moved, do not enter your previously assigned TRIFID, enter "New Facility". If you are filing a separate Form R or A 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: <https://www.epa.gov/enviro>.

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

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.

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Location reporting TRI releases for the first time to EPA.

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).

## Part II. Chemical Identification Information

### Section 1. EPCRA Section 313 Chemical Identity (Form R & A)

#### 1.1 CAS Number

You must report the CAS number or category code on your unsanitized Form R or 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 R or A, or sanitized substantiation form.

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

You must report the specific EPCRA section 313 chemical identity on your unsanitized Form R or 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., Dicofo), 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 A, or sanitized substantiation form. Include a generic name that is structurally descriptive in Part II, Section 1.3 of your sanitized Form R or A report.

#### 1.3 Generic Chemical Name

Section 1.3 is used only when claiming the specific EPCRA section 313 chemical identity of the EPCRA section 313 chemical as a trade secret.

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.

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 As, and the name must be the same as that used on your substantiation forms.

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

#### 5.3 Discharges to Receiving Streams or Water Bodies

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.

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

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.

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

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

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.

## **Section 8. Source Reduction and Waste Management (Form R)**

### **8.10 Did Your Facility Engage in Any Newly Implemented Source Reduction Activities for This Chemical During the Reporting Year?**

Instructions on how to report source reduction activities on hard copy Form R are provided below.

- **If Your Facility Implemented Source Reduction Activities.** 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 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.

### **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.

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 <https://www.epa.gov/tri/p2> 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 [https://www.epa.gov/sites/production/files/documents/tri\\_p2\\_tipsheet.pdf](https://www.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.

### ***Barriers to Implementing Pollution Prevention Activities***

- B1. Insufficient capital to install new source reduction equipment or implement new source reduction activities/initiatives.
- B2. Require technical information on pollution prevention techniques applicable to specific production processes.
- B3. Concern that product quality may decline as a result of source reduction.
- B4. Source reduction activities were implemented but were unsuccessful.
- B5. Specific regulatory/permit burdens
- B6. Pollution prevention previously implemented- additional reduction does not appear technically or economically feasible.
- B7. No known substitutes or alternative technologies.
- B8. Other barriers.

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.

### **Section 9. Miscellaneous Information (Form R)**

#### **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. 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

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data quality control as well as additional TRI-related enforcement and compliance efforts.

EPA suggests you consider the following topics should you provide optional information in the 9.1 box:

- 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

*Do not submit information you consider to be CBI or otherwise protected on your Form R.*

## **9.2 Optional Pollution Prevention and Additional Information for This Toxic Chemical on Your Form A Certification Statement**

Your facility may provide additional information pertaining to pollution prevention or other topics for

each Toxic Chemical or Mixture Component included on your Form A Certification Statement submission. Information provided in this section may provide the Agency and/or the public with useful data that helps explain your use of Form A Certification Statement. For example, your facility could include information on steps it has taken to reduce its manufacture, processing, or other use of the chemical. Do not submit information you consider to be CBI or otherwise protected.

EPA suggests you consider the following topics should you provide optional information in the 9.2 box:

- Changes in Production Levels
- Source Reduction Activity Reduced Activity Involving this Chemical
- One-Time or Intermittent Events Involving this Chemical
- No TRI Report Expected for this Chemical Next Year

*Do not submit information you consider to be CBI or otherwise protected on your Form A.*