TRI Program: Q&A Consolidation Effort

The TRI Program hosts several guidance documents on its guidance website, [GuideME](). These include 5 current Q&A documents, which provide specific guidance to reporting facilities:
- 1998 EPCRA 313 Q&As
- 1998 Newly Added Industries Q&A
- 1999 Federal Addendum Q&A
- 2004 Q&A Addendum
- Frequent Questions

Goal

TRI is working to consolidate all current Q&As into a single document: *2019 Q&As Consolidation*. All existing Q&A documents will be archived (listed above).

Plans

The document will be organized thematically, so that all current Q&As are re-ordered and renumbered. Consolidation will make minor edits to some Q&As (limited to changes like adding regulatory citations and updating any Standard Industrial Classification (SIC) codes to North American Industrial Classification System (NAICS) codes). These minor changes do not alter any reporting requirements (OGC reviewed the changes).

Q&As in the 2019 document will reference their previous versions (document and number). All 5 current Q&A documents will subsequently be archived and will remain publicly available.

All programmatic websites and the reporting software will point to the updated 2019 version.

OGC reviewed all minor edits made in the 2019 Q&As Consolidation and approved of this plan in September 2018.

Due to GuideME, this effort is relatively straightforward so we do not anticipate significant resources being needed to accomplish this task. In fact, much of the work has already been completed.

Steps to Release 2019 Q&As Consolidation
- Submit Q&As to OMB via an ICR change request (RCS has already discussed with OMB and OMB suggested the review process would likely be quick and straightforward)
- Optional: Publish a Federal Register Notice (no comments needed) to announce the consolidation
- Goal: Release 2019 Q&A Consolidation and archive existing Q&A guidance in January 2019 to coincide with launch of TRI-MEweb (TRI reporting software) for Reporting Year 2018.

Benefit

This will simplify and streamline reporting guidance for facilities by creating a single, updated Q&As source. This will allow facilities to download or view only a single document when looking at the entire scope of TRI's reporting Q&As. Due to entries duplicated across existing documents, this effort will reduce the number of discrete Q&As to 990 entries (from 1202). Additionally, due to regulatory changes and court decisions, some Q&As in the 2004 Q&A Addendum supersede previous Q&As. This consolidation will eliminate any older Q&As noted as "not current" due to superseding guidance to further streamline the document. Similarly, minor inaccuracies due to subsequent regulatory actions will be resolved (e.g., Q&As refer to SIC codes rather than to NAICS codes).