Ohio EPA
Regulatory Compliance Seminar
2019

Toxic Release Inventory

Jeff Beattie
Toxic Release Inventory

- TRI
- Section 313
- Emergency Planning and Community Right-to-Know Act (EPCRA)
Purpose of TRI Reporting

• To provide the public and authorities with information on releases and other waste management of the Section 313 toxic chemicals and chemical categories in the communities.
Limitations of TRI Data

• TRI data reflect releases and other waste management of chemicals, **NOT** exposures of the public to those chemicals.

• The TRI Program does not cover ALL sources of releases and other waste management activities such as automobile emissions, and does not cover ALL toxic chemicals or industry sectors.
Who Must Report

Facilities must meet 3 criteria to trigger reporting:

◦ It must conduct operations in a covered North American Industry Classification Codes (NAICS); and

◦ It must have 10 or more employees (equivalent of 20,000 hours or greater); and

◦ It manufactures, processes or otherwise uses any listed toxic chemical in amounts greater than the “threshold” quantity.
## Covered SIC Codes

<table>
<thead>
<tr>
<th>Industrial Sector</th>
<th>Primary SIC Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manufacturing</td>
<td>20-39</td>
</tr>
<tr>
<td>Metal Mining</td>
<td>10 (except 1011, 1081, and 1094)</td>
</tr>
<tr>
<td>Coal Mining</td>
<td>12 (except 1241)</td>
</tr>
<tr>
<td>Electric Utilities</td>
<td>3911, 4931 and 4939, limited to facilities that combust coal and/or oil for the purpose of generating electricity for distribution in commerce</td>
</tr>
<tr>
<td>Treatment, Storage, and Disposal Facilities</td>
<td>4953, (limited to facilities regulated under the Resource Conservation and Recovery Act, Subtitle C)</td>
</tr>
<tr>
<td>Solvent Recovery Services</td>
<td>7389, limited to facilities primarily engaged in solvent recovery services on a contract</td>
</tr>
<tr>
<td>Chemical Distribution</td>
<td>5169</td>
</tr>
<tr>
<td>Petroleum Bulk Terminals</td>
<td>5171</td>
</tr>
</tbody>
</table>
North American Industry Classification System

**TRI-Covered Industries**

- 212 Mining
- 221 Utilities
- 31 - 33 Manufacturing
- All Other Miscellaneous Manufacturing (includes 1119, 1133, 2111, 4883, 5417, 8114)
- 424 Merchant Wholesalers, Non-durable Goods
- 425 Wholesale Electronic Markets and Agents Brokers
- 511, 512, 519 Publishing
- 562 Hazardous Waste
- Federal Facilities
North American Industry Classification Codes (NAICS)

- Requires facilities reporting to TRI to use NAICS in place of SIC codes.

- Cross-walk available at: [www.census.gov/epcd/www/naics.html](http://www.census.gov/epcd/www/naics.html)

- Petroleum Refineries (SIC 2911).....NAICS 324110

- Petroleum Bulk Terminals (SIC 5171)....NAICS 424710
Employee Threshold

• 10 full-time employees (20,000 hours)
  ◦ Worked at or directly for facility
  ◦ Includes operational staff, administrative staff, contractors, dedicated sales staff, company drivers, off-site direct corporate support
  ◦ Does NOT include contract drivers or janitorial contractors
  ◦ Determinations based on available time management systems/data
Listed TRI Chemicals

- Over 600 toxic chemicals and chemical categories listed

- [http://www.epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals](http://www.epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals)

- and select “Current Year List of TRI Chemicals.”
Section 313 Chemicals (non-PBT) Thresholds

- A facility meeting all applicability criteria must file a Form R report for a non-PBT Section 313 chemical if the facility:
  - Manufactured (including imported) more than 25,000 pounds of the chemical in the reporting year, or
  - Processed more than 25,000 pounds of the chemical in the reporting year, or
  - Otherwise Used more than 10,000 pounds of the chemical in the reporting year
Section 313 Chemicals With Qualifiers

- Qualifiers - Listed chemicals with parenthetic qualifiers subject to TRI reporting only if manufactured, processed, or otherwise used in specified form (40 CFR §372.25(g)). Below are some examples (see Table II of EPA’s TRI Reporting Forms and Instructions document):

<table>
<thead>
<tr>
<th>Chemical</th>
<th>CAS #</th>
<th>Qualifier</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aluminum</td>
<td>7429-90-5</td>
<td>Fume or dust</td>
</tr>
<tr>
<td>Aluminum Oxide</td>
<td>1344-28-1</td>
<td>Fibrous forms</td>
</tr>
<tr>
<td>Asbestos</td>
<td>1332-21-4</td>
<td>Friable forms</td>
</tr>
<tr>
<td>Isopropyl alcohol</td>
<td>67-63-0</td>
<td>Only manufacturers using strong acid process</td>
</tr>
<tr>
<td>Phosphorus (not phosphate)</td>
<td>7723-14-0</td>
<td>Yellow or white</td>
</tr>
<tr>
<td>Saccharin</td>
<td>81-07-2</td>
<td>Manufacture only</td>
</tr>
<tr>
<td>Hydrochloric acid</td>
<td>7647-01-0</td>
<td>Acid aerosols</td>
</tr>
<tr>
<td>Sulfuric acid</td>
<td>7664-93-9</td>
<td>Acid aerosols</td>
</tr>
<tr>
<td>Vanadium</td>
<td>7440-62-2</td>
<td>Except when contained in alloy</td>
</tr>
</tbody>
</table>
Listed PBT TRI Chemicals

• Within the list of 600+ chemicals and chemical categories, there is a subset designated as being of special concern and commonly referred to as PBT chemicals (40 CFR § 372.28)

• PBT chemicals have lower activity thresholds and different reporting requirements than non-PBT TRI chemicals
  – Special rules often apply to PBT chemicals

• 20 chemicals and chemical compound categories are classified as PBTs and have lower activity thresholds

*PBT = Persistent, Bioaccumulative, Toxic
PBT Chemicals

- **Aromatics** – Benzo(g,h,i)perylene, Dioxin and dioxin-like compounds category, Hexachlorobenzene, Octachlorostyrene, Pentachlorobenzene, Polycyclic aromatic compounds (PAC) category, Polychlorinated biphenyl (PCB), and Tetrabromobisphenol A (TBBPA)

- **Metals** – Mercury, Mercury compounds category, Lead, and Lead compounds category, Copper, Copper compounds, etc...

- **Pesticides** – Aldrin, Chlordane, Heptachlor, Isodrin, Methoxychlor, Pendimethalin, Toxaphene, Trifluralin
TRI Chemical Categories

Metal compound chemical categories
- Antimony Compounds
- Arsenic Compounds
- Barium Compounds
- Beryllium Compounds
- Cadmium Compounds
- Chromium Compounds
- Cobalt Compounds
- Copper Compound

- Lead Compounds
- Manganese Compounds
- Mercury Compounds
- Nickel Compounds
- Selenium Compounds
- Silver Compounds
- Thallium Compounds
- Vanadium Compounds
- Zinc Compounds
# PBT Chemicals and Activity Thresholds

- PBT chemicals are subject to separate and lower activity thresholds (See 40 CFR § 372.28)

<table>
<thead>
<tr>
<th>PBT Thresholds</th>
<th>100 lbs./yr (manufactured, processed, or otherwise used)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Aldrin, Lead*, Lead Cmpds., Methoxychlor, Pendimethalin, Polycyclic Aromatic Cmpds., Tetrabromobisphenol A, Trifluralin</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>10 lbs./yr (manufactured, processed, or otherwise used)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chlordane, Heptachlor, Mercury, Toxaphene, Isodrin, PCBs, Benzo(g,h,i)perylene, Hexachlorobenzene, Mercury compounds, Octachlorostyrene, Pentachlorobenzene</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>0.1 g/yr (manufactured, processed, or otherwise used)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dioxin and dioxin-like compounds, excluding lead in stainless steel, brass, or bronze alloys</td>
</tr>
</tbody>
</table>
A plant uses benzene as a raw material to manufacture liquid industrial adhesive for sale. The plant adds 27,000 lbs. of benzene to its liquid adhesive-making operation during the reporting year, but 3,000 lbs. are volatilized during the operation.

How much of the benzene should be applied toward the processing activity threshold?

A. 27,000 lbs.
B. 24,000 lbs.
C. 3,000 lbs.
Answer: A is correct.

27,000 total lbs. of benzene is processed.

Always apply the total amount that enters a process toward the activity threshold.

The quantity of benzene processed exceeds the 25,000 lbs. processing threshold for non-PBT chemicals, therefore, the facility would need to complete a TRI form for benzene. The quantity released to the environment would be reported on the TRI Form R.
Question 2

A facility processes 18,000 lbs. copper sulfate, 10,000 lbs. of cuprous oxide, and otherwise uses 12,000 lbs. of aqueous sulfuric acid solution in a closed system.

For which TRI chemicals or chemical categories would the facility need to submit a TRI form?

A. Copper compounds and sulfuric acid
B. Only copper compounds
C. Only sulfuric acid
**Answer: B is correct.**

The facility has exceeded the 25,000 lbs. processing threshold for copper compounds \((18,000 + 10,000 = 28,000)\) and would need to submit a TRI form for copper compounds.

The qualifier for sulfuric acid (see Section 313 Chemicals) indicates that it is only reportable in an aerosol form. Because the facility only used the sulfuric acid in an aqueous form (and does not generate acid aerosols), it does not need to consider it towards the otherwise use threshold, and no report for sulfuric acid is required.
A facility processes 200,000 lbs. of a mixture containing 10% zinc chromate (ZnCrO₄) and 15% chromium dioxide (CrO₂) by weight.

For which of the following chemical categories was the processing threshold exceeded?

A. Chromium compounds only
B. Zinc compounds only
C. Neither
D. Both
**Answer: A is correct**

Total chromium compounds processed: $(10\% + 15\%)*(200,000) = 50,000$ lbs.
Total zinc compounds processed: $(10\%)*(200,000) = 20,000$ lbs.

The chemical processing threshold (25,000 lbs.) was exceeded for chromium compounds, but not zinc compounds.
TRI Process – 2 Part Process

**Applicability & Threshold Determinations**

- Identify Section 313 chemicals manufactured, processed, or otherwise used at the site
- Determine quantities of Section 313 chemicals and whether they are manufactured, processed, or otherwise used on-site for the reporting year
- If a Threshold is Exceeded...

**Release/Waste Mgmt. Reporting**

- Identify total releases and off-site transfers
- Identify other waste management practices
- Identify pollution prevention activities

**Complete Final QA/QC**

- Submit to EPA & State

**Use TRI-MEweb to Complete Form R or Form A**
Reporting Under TRI

• The reporting forms are called Form R and Form A

• Form R consists of a five (5) page report
  – Part I, Facility Identification Information
  – Part II, Chemical-Specific Information
  – A Form R is submitted for each chemical for which the reporting threshold was exceeded.

• Form A
  – Used by facilities with small quantities of TRI chemicals released or managed as a waste.
  – Multiple chemicals can be reported on a Form A.
Form A Criteria

• Criteria for submitting a Form A for non-PBT chemicals
  – Do not exceed 1,000,000 pounds of the toxic chemical manufactured, processed, or otherwise used.
  – Do not exceed 500 pounds for the total waste management (i.e., releases including disposal, recycling, energy recovery, and treatment) of the Section 313 chemical.*
Reporting Releases

- Release to Air
  - Identifies fugitive and point-source(stack) emissions to the air

- Release to Water
  - Identifies the release amount and the stream of water body name

- Deepwell Injection
  - Identifies quantity injected by the facility and whether the well is Class I or Class II-V

- Release to Land On-site
  - Identifies whether the released amount was to RCRA Subtitle C landfill, other landfill, land treatment, RCRA Subtitle C surface impoundment, other surface impoundment or other disposal
Reporting Releases

- Discharges to POTW
  - Identifies the amount released to POTWs and their names and addresses

- Off-Site Disposal/Treatment
  - Quantity and off-site location information (address, RCRA ID etc.) of chemicals shipped off-site for disposal/treatment

- Energy Recovery On/Off-Site
  - Identifies quantities of the listed chemical that have been used for energy recovery and whether the use was on-site or off-site

- Recycled On/Off-Site
  - Identifies quantities of the listed chemical that have been recycled and whether the recycling occurred on-site or off-site

- Treatment On-Site
  - Identifies quantities of the listed chemical that have been treated and whether the treatment took place on-site or off-site
Air Releases (On Site)

Air releases include both fugitive air emissions and point source air emissions. Fugitive air emissions are all releases to air that don’t occur through a confined air stream. Fugitive emissions include equipment leaks, releases from building ventilation systems and evaporative losses from surface impoundments and spills. Point source air emissions, also called stack emissions, are releases to air that occur through confined air streams, such as stacks, ducts or pipes.

Reported in TRI Form R Sections:
- 5.1: Fugitive or non-point air emissions
- 5.2: Stack or point air emissions
Surface Water Discharges (On Site)

Surface water discharges include discharges to streams, rivers, lakes, oceans and other bodies of water. This includes discharges from contained sources, such as industrial process outflow pipes or open trenches. Facilities must identify the name of each water body into which the TRI chemical is being discharged. Releases of TRI chemicals due to runoff, including stormwater runoff, are also reportable in this category.

Reported in TRI Form R Section:

- 5.3: Discharges to receiving streams or water bodies
Land Releases (On Site)

Land releases include disposal of toxic chemicals in landfills (in which wastes are buried) or surface impoundments (which are uncovered holding areas used to volatize and/or settle waste materials), other land disposal methods (such as waste piles), and other releases to land (such as spills or leaks). Land releases also include injection into underground wells. An injection well is a device that places fluids deep underground into porous rock formations, such as sandstone or limestone, or into or below the shallow soil layer.

Reported in TRI Form R Sections:

- 5.4.1: Underground injection on site to Class I Wells
- 5.4.2: Underground injection on site to Class II-V Wells
- 5.5.1A: RCRA Subtitle C landfills
- 5.5.1B: Other landfills
- 5.5.2: Land treatment/application farming
- 5.5.3A: RCRA Subtitle C surface impoundments
Recycling (On Site)

Recycling includes a variety of methods through which toxic chemicals in waste can be recovered, such as solvent recovery and metals recovery. To be reported as recycling under TRI, the chemicals or the waste containing the chemicals must undergo a recovery step prior to being used again, such as removing impurities from a solvent. The choice of the recycling method depends on the toxic chemical. Once they have been recycled, these chemicals may be reused at the facility or made available for use in commerce.

Reported in TRI Form R Section:
- 8.4: Quantity recycled on site
Used for Energy Recovery (On Site)

A facility can report a toxic chemical as "used for energy recovery" if the chemical was combusted in an industrial furnace (including kilns) or boiler (as defined in the regulations) to generate heat or energy for use at the facility. This process can be used for toxic chemicals of significant heating value (>5000 BTUs) in wastes. Incineration of a chemical that is not of significant heating value or in a device that does not meet the regulatory definition of an industrial furnace or boiler is not considered to be used for energy recovery.

Reported in TRI Form R Section:
- 8.2: Quantity used for energy recovery on site
Treatment (On Site)

On-site treatment includes a variety of methods through which toxic chemicals in waste may be treated, such as biological treatment, incineration, and chemical oxidation. These methods typically result in varying degrees of destruction of the toxic chemical. Facilities report the quantity of the toxic chemical destroyed in on-site waste treatment operations.

Reported in TRI Form R Section:
- 8.6: Quantity Treated On Site
Off-site Transfers of Toxic Chemicals in Waste

An off-site transfer is the transfer of toxic chemicals in waste to a facility that is geographically or physically separate from the facility reporting under TRI. Chemicals reported to TRI as transferred are sent to off-site facilities for the purposes of recycling, energy recovery, treatment, or disposal. The amounts reported represent a movement of the chemical away from the reporting facility. Except for off-site transfers to disposal, these amounts do not necessarily represent entry of the chemical into the environment.

Reported in TRI Form R Sections:

• 6.1: Discharges to Publicly Owned Treatment Works (POTWs)
• 6.2: Transfers to Other Off-Site Locations
Transfers Off Site for Disposal

This category includes various methods of disposal, such as landfills, surface impoundments, and underground injection. Off-site transfers to disposal are also referred to as "off-site releases."

 Reported in TRI Form R Section:

• 6.2: Transfers to Other Off-Site Locations
Transfers Off Site for Recycling

Off-site recycling includes a variety of methods through which toxic chemicals in waste can be recovered, such as solvent recovery and metals recovery. To be reported as off-site recycling, the chemicals or the waste containing the chemicals must undergo a recovery step prior to being used again, such as removing impurities from a solvent. The choice of the recycling method depends on the toxic chemical. Once they have been recycled, these chemicals may be returned to the originating facility for further processing or made available for use in commerce. Facilities report the quantity of the toxic chemical that left the facility boundary for recycling.

Reported in TRI Form R Section:

- 6.2: Transfers to Other Off-Site Locations
Transfers Off Site for Energy Recovery

A facility can report a toxic chemical as "used for energy recovery" if the chemical was combusted in an industrial furnace (including kilns) or boiler (as defined in the regulations) to generate heat or energy for use at the facility. This process can be used for toxic chemicals of significant heating value (>5000 BTUs) in wastes. Incineration of a chemical that is not of significant heating value or in a device that does not meet the regulatory definition of an industrial furnace or boiler is not considered to be used for energy recovery. Facilities report the quantity of the toxic chemical that left the facility boundary for energy recovery, not the amount combusted at the off-site location.

Reported in TRI Form R Section:

• 6.2: Transfers to Other Off-site Locations
Transfers Off Site for Treatment (Excluding POTWs)

Off-site treatment includes a variety of methods through which toxic chemicals in waste may be treated, such as biological treatment, incineration, and chemical oxidation. These methods typically result in varying degrees of destruction of the toxic chemical. Facilities report the quantity of the toxic chemical that left the facility boundary for treatment, not the amount that was destroyed at the off-site location(s).

Reported in TRI Form R Section:

- 6.2: Transfers to Other Off-site Locations
Off-site Transfers to Publicly Owned Treatment Works (POTWs)

A POTW is a wastewater treatment facility that is owned by a state or municipality. Wastewaters from facilities reporting under TRI are transferred through pipes or sewers to a POTW. Treatment or removal of a chemical from the wastewater depends upon the nature of the chemical, as well as the treatment methods present at the POTW. Not all TRI chemicals can be treated or removed by a POTW. Some chemicals, such as metals, may be removed, but are not destroyed and may be disposed of in landfills or discharged to receiving waters. Transfers to POTWs of metals and other chemicals that are not destroyed are categorized as off-site releases.

Reported in TRI Form R Section:
- 6.1: Discharges to Publicly Owned Treatment Works (POTWs)
Submitting TRI Reports

• Reports are due July 1
  – The report summarizes the releases which occurred in the previous calendar year.

• TRI reports are be submitted to U.S. EPA via CDX.

• Ohio EPA **NO LONGER** collects an annual filing fee
  – Base $50.00 (not required if only filing Form “A”)
  – Additional $15.00 for each Form “R” submitted
  – Fee Cap $500.00 Late Fee Penalty 15% after August 1st
TRI-ME web and Submitting Via CDX

• Electronic filing via TRI-ME web is required

• No paper submissions are accepted (except for trade secrets), including revisions and withdrawal

• TRI-ME web supports new reporting, revisions & withdrawals for RY 1991 – current year

• TRI-ME web can import current year reporting forms with data submitted for the prior reporting year and assists users in finding reporting errors

• EPA provides instant email confirmation of transmitted and certified submissions

• TRI-ME web resources including tutorials are available to help users at: https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms
TRI-ME web

- TRI-ME web has many new features:
  - Requires no software download. It can be accessed anywhere there is internet connection
  - Has quicklists that allow users to customize the questionnaire to areas of the TRI forms that are applicable
  - Automatically populates current year forms based on last year’s data for you to begin your report
  - Maintains prior year data and will store in-progress data
  - Has an automated Section 8 column b calculator
  - Has enhanced data quality and error validation checks for a clean and error free submission
  - Offers new reports such as the Trend Analysis Report that allows you to compare prior year submissions to the current year
Accessing TRI-ME web

- TRI-ME web is accessed through EPA’s Central Data Exchange (CDX)
  - CDX is accessed through: [https://cdx.epa.gov](https://cdx.epa.gov)
  - TRI-ME web users must have a CDX account
  - Select TRI-ME web user role: preparer or certifying official

- Within TRI-ME web, new users must gain access to their facility
  - Option 1: Enter TRIFID and Technical Contact Name
  - Option 2: Enter six-digit facility access code
  - Option 3: New facility, never reported to TRI

- For assistance with accessing your facility, contact the CDX helpdesk at helpdesk@epacdx.net or call toll-free at (888) 890-1995.
Signing and Certifying Forms

• New Certifying officials must complete the following two requirements

• **Electronic Signature Agreement (ESA)**
  – Must be completed only once, not annually, applicable to all facility profiles
  – Option 1: Real-time ESA approval – verify user’s identity electronically
  – Option 2: Mail in signature form – minimum of 5 business days to process

• **TRIFID Signature Agreement**
  – Must be completed after access to TRI-ME web is granted by ESA approval
  – Facility profiles are added to TRI-ME web using access keys or prior year information
  – Certifying officials must have a digitally signed TRIFID Signature Agreement foreach facility profile before access to any pending submission(s) for certification is granted

• New certifying officials must submit an ESA and digitally sign a TRIFID Signature Agreement before pending submissions can be reviewed and certified
### Form R Content

**Part I**
- Section 1: Reporting Year
- Section 2: Trade Secret Information
- Section 3: Certification
- Section 4: Facility Identification
- Section 5: Parent Company Info

**Part II**
- Section 1: Toxic Chemical ID
- Section 2: Mixture Component ID
- Section 3: Activities & Uses
- Section 4: Max Amt on site for CY
- Section 5: On-site Releases
- Section 6: Off-site Transfers
- Section 7: On-site Waste Treatment, Energy Recovery, Recycling Processes
- Section 8: Source Reduction and Waste Management Activities
Submitting TRI Reports

• Facilities report using “TRI-ME web”, a web-based application that requires no downloads or software installations.
  • Software leads user through series of logical questions and streamlines the analysis needed to determine if a user must complete a Form “R” or Form “A” for a particular chemical
  • Built in edit checks eliminate many errors.
• Reports prepared electronically can be filed simultaneously to USEPA and Ohio EPA through the Federal Central Data Exchange (CDX).
• This eliminates diskette submittal to Ohio.
TRI Guides

https://ofmpub.epa.gov/apex/guideme_ext/f?p=guide me:gd-list:0:#cr_sr_training


https://www.epa.gov/toxics-release-inventory-tri-program/basics-tri-reporting
Basic Concepts Course

This course will help you determine:

- If your facility is covered by EPCRA Section 313 (the Toxic Release Inventory); and

- If your facility is covered, for which chemicals your facility must submit a TRI report.
You will also learn about:

- Information on making the release and other waste management calculations and estimates;
- When the Form A Certification statement can be used instead of the Form R;
- Reporting exemptions (i.e., particular uses of TRI chemicals that don’t have to be included in TRI reports); and
- General TRI program and process information.
If your facility must report to TRI, this course will help you understand:

• Advanced issues related to threshold determinations, TRI reporting, and exemptions;

• Information on reporting requirements for PBTs (such as lead, mercury, PACs, etc.) and other chemicals (such as hydrochloric acid aerosols, ammonia, metal compounds, nitrate compounds, and metal cyanides) with special TRI reporting considerations;

• General TRI program and process information; and

• How to use the TRI-MEweb online reporting application, and the CDX electronic submission process
USEPA Database
Toxic Release Inventory

- U.S. EPA compiles all the reports into a database that can be accessed over the internet.
  - TRI Explorer
  - TRI Envirofacts
  - TRI.Net

http://www.epa.gov/toxics-release-inventory-tri-program/tri-data-and-tools
Cuyahoga County TRI Reporting

Adalet  331524 Aluminum Foundries
Avalon Precision Castings  331512 Steel Investment Foundries
Charter Steel  331110 Iron & Steel Mills and Ferro Alloy Mfg
General Electric Tungsten  331491 Non-Ferrous Metal
ITW Bedford Wire  331222 Steel Wire Drawing
Magretech LLC  331492 Secondary Smelting Refining
Victory White Metal  331491 Non-Ferrous Metal
Worthington Steel  331221 Rolled Steel Shape Mfg
TRI Cuyahoga County Chemicals

Nickel & Nickel Compounds                   Antimony
Chromium & Chromium Compounds              Propylene
Manganese & Manganese Compounds            Vanadium
Lead & Lead Compounds                      Zinc Compounds
Copper & Copper Compounds                  Ammonia
Mercury Compounds                          Nitric Acid
Cyanide Compounds                          Antimony
TRI 2017 Facts

- Total TRI Reporting in Country - 21,530
- Ohio TRI Reporting Facilities - 1,329
- Ohio ranks #5 in TRI Releases and Waste Management
- Primary Metals Sector accounts for approximately 25% of TRI Reporting in Ohio
TRI Reporting

Cuyahoga County has **149** TRI reporting facilities with 20 within NACIS 331 sector.

- 44.7 million total waste management.
- 8.9 million total on-site and off-site disposal or other releases (air/water/and land.

Cuyahoga County #1 in Ohio
- Hamilton and Franklin behind.
Technical Assistance

- Regulatory Assistance
  - 800-424-9346 (option 3)
- CDX
  - 888-890-1995
- TRI Reporting Assistance
  - 703-227-7644
  - [www.epa.gov/tri/](http://www.epa.gov/tri/)
- Ohio EPA TRI Unit
  - (614) 644-2260
For More Information and Assistance

• For more information on TRI requirements, see the second part of this training course on TRI **Advanced Concepts**.

• For TRI reporting guidance, information and tutorials on the TRI-Me web reporting software, and the latest changes to the TRI Program please visit [https://www.epa.gov/toxics-release-inventory-tri-program](https://www.epa.gov/toxics-release-inventory-tri-program).


• For help accessing CDX accounts, password resets, accessing a facility, or completing an ESA, contact the CDX helpdesk: [https://cdx.epa.gov/Contact](https://cdx.epa.gov/Contact).
Questions?