

TRI Source Reduction Reporting

Questions and Answers

What is source reduction?

EPA's Toxics Release Inventory (TRI) Program refers to source reduction as any practice that reduces, eliminates, or prevents pollution from being released or entering a waste stream. Source reduction differs from other waste management practices, such as recycling and treatment, which refer to how chemical waste is managed after it is generated.

Can source reduction be reported to TRI every year?

A new source reduction activity must be reported in the year that it is started or fully implemented. Updates on ongoing efforts may be described in the optional section of the TRI reporting form.

How should multi-year activities be reported?

Source reduction activities that form part of large multi-phase, multi-year projects should be tracked separately. Facilities should report each distinct activity in the year it is implemented. For example, if a facility identifies several changes that will be implemented between 2018 and 2020, and implements one change each year, the facility should report one activity for Reporting Year (RY) 2018, one for RY 2019, and one for RY 2020.

How significant of an activity should be reported?

Each TRI reporting form should include all source reduction activities implemented for the chemical being reported; no source reduction activity is insignificant or too small to be reported. Continuous improvement is common at facilities, and when source reduction improvements are implemented, they must be reported. EPA also encourages facilities to provide additional details regarding (1) how source reduction was achieved, and (2) any barriers that prevented source reduction. These details will help EPA and others learn from facilities' successes and challenges.

What effect will implementing a source reduction activity have at my facility?

Assuming all other factors are fixed, facilities should expect releases and other waste managed quantities to decrease due to source reduction. However, consider:

- Not all source reduction activities result in the same environmental impact. For example, implementing good operating practices may result in less of a decrease than raw material modifications.
- Source reduction activities may only be feasible for certain chemicals or processes, and the resulting aggregate quantities may not truly reflect the quantities reduced or eliminated.
- Increased production may also impact the quantity of waste generated.

Reporting Source Reduction to TRI

Required Reporting

Facilities MUST report their new source reduction activities (TRI form, Sec. 8.10).

- Activities are reported by selecting the source reduction activity code that best describes the actions taken. There are 49 activity codes that fall into 8 categories.
- Facilities must also indicate how the activity was identified by selecting at least one method code.

Optional Reporting

Facilities MAY report other source reduction information (TRI form, Sec. 8.11), including:

- An estimate of the expected reduction in the annual amount of chemical waste managed;
- Additional details (in narrative form)
 on any source reduction practices or
 other environmental management
 practices that provide greater insight
 into the activities implemented;
 and/or
- Barriers that prevent the implementation of source reduction activities at the facility.



How much information do I have to share?

Facilities must indicate, through the selection of codes, the source reduction activity that best aligns with the practice implemented during the year.

You are encouraged, however, to provide enough details (through optional narratives) to showcase your facility's accomplishments in source reduction, and for others to better understand the source reduction activity implemented. If possible, describe how chemicals were eliminated or provide details on substitutions (such as giving names of alternative chemicals used).

What are the benefits of sharing source reduction information with EPA?

Benefits of reporting on source reduction practices, especially with detailed narratives, include:

- Contributing to a shared knowledge base of source reduction practices implemented by industry;
- Promoting awareness of environmental stewardship among local communities;
- Learning from information provided by industry peers along the value chain, which may lead to the identification of more P2 opportunities;
- Tracking and gauging your facility's performance;
- Having pollution prevention activities possibly showcased through case studies or other forms of recognition; and
- Enabling identification of technological areas where research is needed on less-polluting alternatives.

Pollution Prevention at Nordic Ware



Nordic Ware is a kitchenware manufacturer based in Minneapolis. This facility worked with its suppliers to reduce the amount of glycol ethers in its coatings and found new cleaning solutions with lower quantities of glycol ethers. By 2013, Nordic Ware decreased the quantity of glycol ethers used on-site to below the TRI reporting threshold.*

Watch TRI's Nordicware video to learn more!

You can find examples of source reduction reporting using <u>EPA's Pollution Prevention Search Tool</u>. An example of freetext entries from a facility report is shown below. To learn more about TRI and Pollution Prevention, visit <u>www.epa.gov/tri/p2</u>.

Facility Name	Address	Chemical Name	Prior Year Release	Current Year Release	Percent Change	Pollution Prevention Information (<i>Activity Codes/</i> Text)		Percent change indicates change in releases from prior year
RODDA PAINT CO (CLOVERDALE PAINT)	6123 N MARINE DR, PORTLAND, OR 97203	Toluene	2,107.00	1,475.00	-30%	Source Reduction: W42: Substituted raw materials - Replaced a portion of our xylene and toluene with acetone and methyl acetate		Source reduction activity codes indicate the type of activity implemented at the facility
RODDA PAINT CO (CLOVERDALE PAINT)	6123 N MARINE DR, PORTLAND, OR 97203	Certain Glycol Ethers	895.00	658.00	-26.48%	Source Reduction: W42: Substituted raw materials - General market trend is toward lower VOC coatings. Methods to Identify SR Opportunities: T10: Vendor Assistance - Continuous technology development in the raw material stream provides opportunity to lower VOC of coatings while maintaining coating performance properties.		Optional free-text entries provide more detail about specific actions
							•	Methods used to identify source reduction activities are also reported to TRI