

General Information

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 Emails are sent to the affected certifying official by CDX when any ESA has been revoked within *TRI-MEweb*.

Mailing information for EPA's Data Processing Center can be found below or on the TRI website under <http://www.epa.gov/tri/index.htm>. Contact Us:

Send ESA approval requests by *regular mail* to the following address:

Attention: TRI ESA Approval Request
TRI Reporting Center
P.O. Box 10163
Fairfax, VA 22038

Send ESA approval requests by *certified mail or overnight mail* to the following address:

Attention: TRI ESA Approval Request
CGI Federal, Inc
c/o EPA Reporting Center
12601 Fair Lakes Circle
Fairfax, VA 22033

For questions or additional information about CDX, please see: <http://www.epa.gov/cdx>.

A.2.b How to Submit Paper Form R (s) and/or Form A(s)

It is EPA's ultimate goal to move away from processing paper submissions and receive all TRI submissions via CDX. Although EPA strongly discourages paper submissions due to increased possibility of errors, paper submissions are currently still accepted. Paper submissions must be sent to both EPA and the state (or the designated official of an Indian tribe). 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 current

reporting year forms; out-of-date forms will be considered out of compliance. To facilitate the completion and processing of paper forms, EPA is providing electronically fillable reporting forms that can be completed prior to printing. EPA strongly encourages facilities to use this new tool to complete forms prior to printing them. The fillable reporting forms can be found on URL: <http://www.epa.gov/tri/report/index.htm>

Send paper forms by regular mail to:

TRI Reporting Center
P.O. Box 10163
Fairfax, VA 22038

Send paper forms by certified mail or overnight mail (i.e. Fed Ex, UPS, etc.) to:

CGI Federal, Inc
c/o EPA Reporting Center
12601 Fair Lakes Circle
Fairfax, VA 22033

E-mail submissions will not be accepted.

Also send a copy of the report to the state in which the facility is located. "State" also includes: the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, Marshall Islands, the U.S. Virgin Islands, the Commonwealth of the Northern Mariana Islands, and any other jurisdiction and Indian Country. Refer to Appendix E for the appropriate state submission addresses.

Facilities located on Indian land should send a copy to the Chief Executive Officer of the applicable Indian tribe. Some tribes have entered into a cooperative agreement with states; in this case, report submissions should be sent to the entity designated in the cooperative agreement.

A.3 Trade Secret Claims

For any EPCRA Section 313 chemical whose identity is claimed as trade secret, you must submit to EPA two versions of the substantiation form as prescribed in 40 CFR Part 350, published July 29, 1988, in the *Federal Register* (53 FR 28772) as well as two versions of the EPCRA Section 313 report. The current substantiation form is available on the TRI website at <http://www.epa.gov/tri/report/index.htm#forms>.

One set of reports, the unsanitized version, must

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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.

Use the order form in this document to obtain copies of the rule and substantiation form. Further explanation of the trade secret provisions is provided in Part I, Sections 2.1 and 2.2, and Part II, Section 1.3, of the instructions.

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

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

Securely fasten all four reports together.

Some states 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’s submission requirements by contacting the appropriate state designated EPCRA Section 313 contact (see Appendix E).

Where to send your trade secret submission

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

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

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

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

A.4 Recordkeeping

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

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

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

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