

“Reporting Pollution Prevention Information to the TRI”

Chat log from June 14 webinar

From Sarah Swenson (TRI Program, EPA) to Everyone:

- Hi, everyone. If you have a detailed reporting question related to a specific scenario at your facility, please contact the knowledgeable staff at the TRI Information Center: 1-800-424-9346 (select menu option #3)

From Sarah Swenson (TRI Program, EPA) to Everyone:

- Please also check the one-stop shop for TRI guidance and training, GuideME: https://guideme.epa.gov/ords/guideme_ext/f?p=guideme:home

From Charles Allen to Everyone:

- If we report P2 to our State is it still required to report our P2 on our Form R?

From latoya.littlejohn to Everyone:

- Do these reductions only apply to hazardous wastes/recycling, and not to non-hazardous waste reduction/recycling?

From HOFFJER to Everyone:

- So 'Not Applicable' used in section 8.10 is not acceptable, and entries must be made for the source reduction activities?

From Sarah Swenson (TRI Program, EPA) to Everyone:

- Charles, facilities are required to report any new P2 activities for the chemical initiated during the reporting year.

From Sandra Gaona (US EPA) to Everyone:

- You can also read more about Source reduction reporting requirements at https://guideme.epa.gov/ords/guideme_ext/f?p=guideme:rfi:::::rfi:4_8_10

From Sarah Swenson (TRI Program, EPA) to Everyone:

- We'll post these slides following the webinar and email everyone the link

Sandra Gaona (US EPA) to Everyone:

- Not applicable means that source reduction activities did not occur for the reported EPCRA Section 313 chemical during the reporting year.

From Brittany to Everyone:

- If you did not initiate any source reduction activity for this chemical during the reporting year, check the "Not Applicable" checkbox and consider reporting barriers faced to implementing source reduction activities." If we initiated source reduction activities that impacted the chemical but were not initiated because of or in order to reduce that chemical, are we required to report those activities?

From Rex Taylor to Everyone:

- If our chemicals are below the limit this year, do we have to do anything? Is there a report to fill out or a box to check?

From Warren to Everyone:

- Would a planned or unplanned shutdown of a particular process, that reduces the amount of waste generated due to the shutdown, be considered a P2 activity?

From Abhinav to Everyone:

What are the threshold limits in general?

From Sarah Swenson (TRI Program, EPA) to Everyone:

- If your facility doesn't meet TRI reporting requirements, you're not required to let EPA know, but there is a place to do so in TRI-MEweb. It's helpful to EPA if you provide this information.

From Sandra Gaona (US EPA) to Everyone:

- Recommend you use the optional reporting field to inform that you are not submitting a report.
https://guideme.epa.gov/ords/guideme_ext/f?p=guideme:rfi:::::rfi:1_8

From Peter M to Everyone:

- If source reduction is not possible due to increased production volume, how best to identify this?

From Sarah Swenson (TRI Program, EPA) to Everyone:

- The reporting thresholds are explained here:
https://guideme.epa.gov/ords/guideme_ext/f?p=guideme:rfi:::::rfi:2_4

From Patti to Everyone:

- What about PFOS and PFAS chemicals used only for fire protection foams to protect process equipment and storage tanks? We have not reported them in the past but have instituted new process improvements to avoid any release during testing by simulation.

From Kim to Everyone:

- Can emission reductions from a pollution control treatment device, like installation of an RTO, be counted as a source reduction? There did not appear to be a source code for this scenario. How should a facility report a reduction in emissions if the input did not change?

From steve493 to Everyone:

- We are able to reuse chemicals that are not reported in TRI but the one chemical we do report we are not able to reduce. Do we give information on the chemicals we can reduce? Is there a spot to do that?

From Sandra Gaona (US EPA) to Everyone:

- You can report barriers to implementing source reduction in the optional section. B99, Other barriers appears most applicable.

From Sandra Gaona (US EPA) to Everyone:

Replying to "We are able to reuse..."

- You can use the optional P2 reporting fields in Section 8.11. The topic General Environmental Management would be a good spot. https://guideme.epa.gov/ords/guideme_ext/f?p=guideme:rfi:::::rfi:4_8_11

From Caitlin Briere to Everyone:

Replying to "Can emission reducti..."

- Pollution control is not considered source reduction, since the waste is still generated, so this would not be reported under source reduction codes. If the installation of a pollution control device leads to reductions in releases reported to TRI, it's still helpful to describe that in the free text field in section 9.1.

From acrider to Everyone:

- If we recover methanol and they use it as a cleaning solvent in another process, would this count as source reduction?

From ALma Cedeno to Everyone:

- How do you capture sustainment and learnings over time of the source reduction activities implementation both in terms of actual reduction of waste and other practical issues, if only asking for the "newly" source reduction activities during the reporting year.

From Bill to Everyone:

- Is there a TRI form R webinar for 1-7 filing guidance?

From Kelly Martin to Everyone:

- My question is not on TRI p2, but rather calculating amounts for specific chemicals that are required to report on. Is this just an estimated amount based on percentages, specifically for chemicals that are solutions or mixture. Also, if treated HWs, how do you calculate these amounts on percentages if POTW HWs. If the m

From Kelly Martin to Everyone:

- amounts have gone down since the year previous, does this go into the P2 section?

From Caitlin Briere to Everyone:

Replying to "If we recover methan..."

- No this wouldn't be source reduction, because the chemical waste is still generated. Depending on the reclamation process, it might be considered recycling under TRI reporting definitions.

From acrider to Everyone:

Replying to "If we recover methan..."

- It prevents the use of new cleaning solvent buy using the recovered methanol to clean again. Would this be recycled then?

From Sandra Gaona (US EPA) to Everyone:

Replying to "If we recover methan..."

- If there is a recovery step, this is considered recycling. If it is direct recirculation, then it would count as source reduction.

From Sarah Swenson (TRI Program, EPA) to Everyone:

- https://guideme.epa.gov/ords/guideme_ext/f?p=guideme:gd-list

From Sarah Swenson (TRI Program, EPA) to Everyone:

- <https://www.epa.gov/toxics-release-inventory-tri-program/electronic-submission-tri-reporting-forms>

From Sandra Gaona (US EPA) to Everyone:

Replying to "If we recover methan..."

- Recommend following up to discuss how to best capture as material substitution and recycling.

From acrider to Everyone:

Replying to "If we recover methan..."

- Thank you Caitlin and Sandra! Where would I report this recycling then?

From Erin Blume to Everyone:

- How would you handle attempted source reduction activities that show initial source reduction, but it's uncertain if it will be sustained (ex: catalyst changes, or maybe a project that results in an unintended source reduction).

From Caitlin Briere to Everyone:

Replying to "If we recover methan..."

- Section 7 - on-site waste management

From Andy to Everyone:

- TRI/R is due annually. how often is the P2 submitted? or are they the same?

From Abhinav to Everyone:

- What are the general threshold limits for TREI chemicals?

From Kelly Martin to Everyone:

- The treated HWs are from our treatment plant (WTP), sorry. I can contact help desk.

From Caitlin Briere to Everyone:

Replying to "If we recover methan..."

- Of course! I'd recommend emailing trihelp@epa.gov with any further questions; there are a few TRI program staff members with access to that inbox and we'll make sure it gets to the best person to answer your question.

From Sarah Swenson (TRI Program, EPA) to Everyone:

- TRI.Help@epa.gov

From Sandra Gaona (US EPA) to Everyone:

Replying to "Can emission reducti..."

- Efficiencies related to pollution control equipment should also be captured in Section 7.
https://guideme.epa.gov/ords/guideme_ext/f?p=guideme:rfi:::rfi:4_7_1

From Caitlin Briere to Everyone:

Replying to "TRI/R is due annual..."

- Yes, annually as part of the Form R submission (assuming you have newly implemented P2 to report)

From Cindy M to Everyone:

- Will all of these questions and answers be posted anywhere?

From Sandra Gaona (US EPA) to Everyone:

Replying to "How do you capture s..."

- Great question. You are encouraged to use Section 8.11 to report ongoing activities and sustained benefits. There is a general Source Reduction topic that can be used.

From Sarah Swenson (TRI Program, EPA) to Everyone:

- <https://www.epa.gov/toxics-release-inventory-tri-program/tri-pollution-prevention-p2-resources>

From Andy to Everyone:

- Is everything done through TRIME web or is anything sent via certified mail?

From Sarah Swenson (TRI Program, EPA) to Everyone:

Replying to "Is everything done t..."

- Everything is done via TRI-MEweb, except trade secret submissions

From Abhinav to Everyone:

- Are there any threshold limits for TRI chemicals?

From Sandra Gaona (US EPA) to Everyone:

Replying to "What are the general..."

- You can learn more about thresholds at <https://www.epa.gov/toxics-release-inventory-tri-program/tri-threshold-screening-tool>