

Questions Log H:\ERD\TRIP2 Analysis\Webinar April 2014\QuestionsLog 2014_04_24 14_52.rtf

Q: Can you please email the presentation to all participants?[Lien-Huong Nguyen-Gale] [lienhuong.nguyen-gal@navy.mil] [Q: 1:58 PM] [A: 2:00 PM]

A: I just posted the location where you can download in the chat window.

Q: Thank you[Lien-Huong Nguyen-Gale] [lienhuong.nguyen-gal@navy.mil] [Q: 2:02 PM]

Q: Will I be able to use the information that I learn today in the report this year?[ALBERT BRESSLER] [al_bressler@pall.com] [Q: 2:06 PM] [A: 2:08 PM]

A: If finalized, these changes will take effect in the forms due July 1, 2015, but is not on the forms due this July 1, 2014.

Q: What if your source reduction is over multiple years - not newly implemented this year?[Rhonda Owens] [rhonda.l.owens@dupont.com] [Q: 2:10 PM]

A: Daniel answered this verbally.

Q: Is this the hard copy form or the online version?[Scott Sherman] [scott.sherman@greatplainsmfg.com] [Q: 2:09 PM] [A: 2:10 PM]

A: Changes apply to the hard copy form (available for trade secret submissions only) and in TRI-MEweb.

Q: If in source reduction you switch to a more concentrated material, or potentially a more hazardous time. How do you account for that?[Michael Balow] [mjbalow@akplastics.com] [Q: 2:11 PM]

A: The definition of source reduction practices includes reducing the amount and the hazard. See the TRI Reporting Forms and Instructions for the full definition. http://www2.epa.gov/sites/production/files/2014-02/documents/rfi_ry2013_120413.pdf

Q: Can we print or get a copy of these slides?[Angela Duncan] [angela_d_duncan@bd.com] [Q: 2:12 PM] [A: 2:12 PM]

A: The presentation is available for download at <http://www2.epa.gov/toxics-release-inventory-tri-program/tri-laws-rulemakings-and-notice> (scroll down to the bottom of the page)

Q: How can we get a copy of today's presentation?[Jacquelyn Nutt] [jacquelyn.nutt@kinross.com] [Q: 2:14 PM] [A: 2:15 PM]

A: The presentation is available for download at <http://www2.epa.gov/toxics-release-inventory-tri-program/tri-laws-rulemakings-and-notice> (scroll down to the bottom of the page)

Q: Slide 4 -- the d column. estimating the reduction in the future -- if your production is growing 25% and your reduction plan is 25% you would not see a change in release though P2 activity did occur. Need to link this to production index also?[James Rubin] [jamie.rubin@avagotech.com] [Q: 2:12 PM] [A: 2:15 PM]

A: Daniel answered this verbally.

Q: If a reduction is implemented and carried forward for several years, should the estimated reductions relative to the process as run several years ago continue to be reported? for how long? [Steve Leeper] [leepersteve2@gmail.com] [Q: 2:15 PM]

A: Daniel answered this verbally.

Q: I recently submitted Form R for this year, and this section was on there already. [Johnny Crawford] [john.crawford@schreiberfoods.com] [Q: 2:15 PM]

A: Section 8.10, 8.11, and 9.1 are on the current reporting forms; it's the check boxes and the % reduction that are the proposed changes.

Q: The last choice is good since many facilities are already MACT [Jerry Ritter] [jerry.ritter@ipaper.com] [Q: 2:16 PM]

A: Thank you for your comment.

Q: Thank you[Jacquelyn Nutt] [jacquelyn.nutt@kinross.com] [Q: 2:16 PM]

Q: Comment on "Percentage range indicating the estimated annual reduction in chemical waste generation associated with a given source reduction activity":

There should be an option for text rather than just percent because in some cases a percent is not meaningful. For example: What would the percentage be for a bullet capture system implemented in a shooting range? Would it include all the soil that had to be removed from decades of use prior to the new system compared to zero soil contamination with the new system?[SHARON HARRIMAN] [sharon.l.harriman@jpl.nasa.gov] [Q: 2:13 PM] [A: 2:16 PM]

A: Thank you for your comment.

Q: When does EPA plan on issuing a final rule for implementing the PPA? Since the proposed rule was issued in 1991 and a final rule is critical to defining what is a waste stream, recycling, process stream, pollution prevention, etc. All of which is necessary to have all reporters provide consistent data and allow for more meaningful pollution prevention data analyses.[Robert Costar] [costaro@leidos.com] [Q: 2:17 PM]

Q: How could I find all of the other facilities with my same industrial code and view what they have done[keith runyon] [keith.runyon@carestream.com] [Q: 2:15 PM] [A: 2:18 PM]

A: Hi Keith - this search function is available using the Pollution Prevention tool online at: <http://www.epa.gov/enviro/facts/tri/p2.html>

Q: thank you[keith runyon] [keith.runyon@carestream.com] [Q: 2:19 PM]

Q: Comment on: "Providing optional barrier codes that facilities can use in Section 8.11 to indicate why they could not implement any source reduction activities during the reporting year."

There should also be a box for "Other" and a text field to provide information on other barrier.[SHARON HARRIMAN] [sharon.l.harriman@jpl.nasa.gov] [Q: 2:19 PM] [A: 2:20 PM]

A: Thank you for your comment.

Q: If there is a reduction in year 2015 of 95%, and the process continues in 2016 at the same rate, what is the percentage for 2016? [Gary McCauley] [gary.mccauley@federalmogul.com] [Q: 2:20 PM]

A: Daniel answered this verbally.

Q: Are there going to be any training offered for metal mining by any region this year prior to submittal date for individuals new to TRI program?[Jacquelyn Nutt] [jacquelyn.nutt@kinross.com] [Q: 2:21 PM]

Q: Region 8 use too but I can't find any information on this now.[Jacquelyn Nutt] [jacquelyn.nutt@kinross.com] [Q: 2:22 PM]

A: Ask your TRI Regional Coordinator. Barbara Conklin for Region 8.

Q: So the only difference is just being able to check the box? Then add text? For instance this year when I filled this out I had to type which barrier and then explain.[Johnny Crawford] [john.crawford@schreiberfoods.com] [Q: 2:17 PM] [A: 2:22 PM]

A: Daniel answered this verbally. You are correct in that the information is currently reported and the check boxes for barrier type are the proposed change.

Q: New section 9 looks good. [Johnny Crawford] [john.crawford@schreiberfoods.com] [Q: 2:22 PM]

A: Thank you for your comment.

Q: If facility is ISO14001 certified, should that be noted under P2? If yes, which section should be used?[Sachin Ladkar] [sachinladkar@hmmausa.com] [Q: 2:26 PM] [A: 2:28 PM]

A: You would note this in Section 8.11 using the "General Environmental Management" checkbox (based on what is currently proposed)

Q: Totally agree this last question about designing in pollution prevention with new systems and getting credit for this up-front thinking! Recommend separate check box for this![James Rubin] [jamie.rubin@avagotech.com] [Q: 2:30 PM] [A: 2:31 PM]

A: Thanks for your comment.

Q: This is just for a comment to be considered. One additional category for barriers to pollution prevention - Alternate technology not available[bobbie dougherty] [bsdougherty@akplastics.com] [Q: 2:31 PM] [A: 2:32 PM]

A: Thank you for your comment.

Q: Just to confirm, if i implement a source reduction activity in Year 1-December, but the benefits of activity are not truly achieved in Year 2, should i complete Section 8.10, including the new optional element, in only Year 1, only Year 2, or both? If Year 2 or Both, will instructions be changed to explain this?[Robert Costa] [costaro@leidos.com] [Q: 2:25 PM] [A: 2:33 PM]

A: Daniel answered this verbally.

Q: Will the free form data entered by reporters in Sections 8.11 and 9.1 be available to EPA enforcement staff?[Robert Costa] [costaro@leidos.com] [Q: 2:27 PM] [A: 2:33 PM]

A: Daniel answered this verbally.

Q: Should improvements made prior to actual implementation (original design vs. actual implementation) be reported as reductions, or should improvements only be reported for a process that has actually been run for a period time and then improved?[Steve Leeper] [leepersteve2@gmail.com] [Q: 2:20 PM] [A: 2:33 PM]

A: Daniel answered this verbally.

Q: There will be some concern that EPA would do enforcement based on reasons for not implementing P2. You've already commented on this but could be seen as a disincentive to complete that section. [Jerry Ritter] [jerry.ritter@ipaper.com] [Q: 2:34 PM]

A: Thank you for your comment.

Q: Can the reduction ranges be normalized to a per/unit production value instead of a total weight reduction?[Paul Delor] [paul.delor@wowway.com] [Q: 2:20 PM] [A: 2:34 PM]

A: Thank you for your comment.

Q: Like the format [Jerry Ritter] [jerry.ritter@ipaper.com] [Q: 2:27 PM] [A: 2:34 PM]

A: Hi Jerry. Thank you for your comment.

Q: 8.9 - what if you used a composite calculation for ratio using production and activities? will there be a both box? [Robert Costa] [costaro@leidos.com] [Q: 2:36 PM]

A: Daniel answered this verbally - thank you.

Q: Will these charts be available on the EPA website for reference? [Rhonda Owens] [rhonda.l.owens@dupont.com] [Q: 2:34 PM] [A: 2:37 PM]

A: These charts are available using the TRI Pollution Prevention Search Tool: <http://www.epa.gov/enviro/facts/tri/p2.html>

Q: IS the REach code, any way tied into the European Union REACH program (toxic material/life cycle, etc)? [Charles Fay] [fayc@airborn.com] [Q: 2:38 PM]

A: No, a stream reach code has no connection to the EU acronym REACH.

Q: Were all the options for disposal to land on-site showing on the screen? What if your land disposal does not fit in one of those categories? [Sherry Burt-Kested] [sherry_burt-kested@fmi.com] [Q: 2:40 PM]

A: Daniel has answered this question verbally - thank you.

Q: I approve of the proposed changes. [Max Woehle] [max.woehle@basf.com] [Q: 2:39 PM] [A: 2:40 PM]

A: Thanks for your comment.

Q: Where is the calculator for production ratio [James Lewis] [james@weatherfordaerospace.com] [Q: 2:40 PM] [A: 2:43 PM]

A: The calculator is available in TRI-MEweb on the Production Ratio page.

Q: In batch operations with large fluxuations based on demand., would reduction (say waste) be spread accoss each chemical reduced? [Donna Mellon] [dmmellon@dow.com] [Q: 2:44 PM]

Q: Can you please repeat where we can find a link to the presentation slides? [Allison Willis] [awillis@agp.com] [Q: 2:40 PM] [A: 2:44 PM]

A: The presentation is available for download at

<http://www2.epa.gov/toxics-release-inventory-tri-program/tri-laws-rulemakings-and-notice> (scroll down to the bottom of the page)

Q: Do we need to wait for the proposed changes to be implemented before starting our Form Rs? [Glenn Mortensen] [glenn.mortensen@oldcastle.com] [Q: 2:44 PM]

A: Daniel has answered this question verbally - thank you.

Q: Our company does a lot of pollution prevention on chemicals not required to be reported under 313 or have not exceeded the threshold to report. think about providing a section to list these activities so public looking at a company could see these activities also. [James Rubin] [jamie.rubin@avagotech.com] [Q: 2:42 PM] [A: 2:44 PM]

A: Thanks for your comment.

Q: Can a facility simply check one of the boxes in Sect. 9.1 or must they also provide detailed comments? [Deanna Machay] [dmachay@sclweb.com] [Q: 2:44 PM] [A: 2:46 PM]

A: Daniel has answered this question verbally - thank you.

Q: Thanks Cheryl and Daniel [Glenn Mortensen] [glenn.mortensen@oldcastle.com] [Q: 2:47 PM]

Q: Production ratio: If a facility is constantly changing products and production levels of various products, would the year to year production ratios be reported as total mass of production for Y2 vs. Y1? Would this approach represent the appropriate production ratio? [Steve Leeper] [leepersteve2@gmail.com] [Q: 2:47 PM]

Q: Thank you for doing this presentation. Very helpful. [James Rubin] [jamie.rubin@avagotech.com] [Q: 2:49 PM]

Q: What if the estimated percent changes in section 8.10 (source reduction) is incorrect or does a facility have to prove this information? [Dominique Zellmer] [dominiquez@industrialprotectioncorp.com] [Q: 2:46 PM] [A: 2:50 PM]

A: Daniel has answered this question verbally - thank you.

Q: is there a way that we could filter this by industry so that we can see what our competition is doing and try to leverage their learnings? [Keith Runyon] [keith.runyon@carestream.com] [Q: 2:13 PM] [A: 2:50 PM]

A: Yes, see the Pollution Prevention Search Tool: <http://www.epa.gov/enviro/facts/tri/p2.html>

Q: Is there going to be a listing of efforts being doing to minimize pollutants [James Lewis] [james@weatherfordaerospace.com] [Q: 2:50 PM] [A: 2:51 PM]

A: Yes, you can search the Pollution Prevention Search Tool: <http://www.epa.gov/enviro/facts/tri/p2.html>

Q: I like the changes. Thanks for the webinar showing them and collecting input from us users. [Karla Mercer]
[karla.mercer@eqonline.com] [Q: 2:51 PM]