



Proposed TRI Reporting Changes for Pollution Prevention (P2) and Other Optional Information

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Note: *This webinar will begin at 2 pm EDT.*



Background on ICR Renewal

- EPA published a [Federal Register notice](#) about renewal of TRI's Information Collection Request (ICR) on March 3
- Notice included several proposed changes to TRI reporting forms and instructions
- EPA is soliciting comments on the proposed information collection on or before May 2
- Following comment period, EPA will submit request to renew ICR to Office of Management and Budget (OMB)
- Changes would be effective as of Reporting Year 2014 (reports due July 1, 2015)



Overview of Proposed Changes

- New optional field for estimating the effectiveness of source reduction activities
- Optional checkboxes to indicate why source reduction activities were not implemented (barriers)
- Optional checkboxes to categorize submitted § 8.11 (P2) and § 9.1 (miscellaneous) information
- Other minor changes to Form R Sections 5 and 8



1) Estimated Annual Reduction

- Proposed change to Form R:

8.10	Did your facility engage in any newly implemented source reduction activities for this chemical during the reporting year? If so, complete the following section; if not, check NA. NA <input type="checkbox"/>				
	Source Reduction Activities (Enter code(s))	Methods to Identify Activity (Enter code(s))			Estimated annual reduction (Enter code (s)) (optional)
8.10.1		a.	b.	c.	d.
8.10.2		a.	b.	c.	d.
8.10.3		a.	b.	c.	d.
8.10.4		a.	b.	c.	d.

- For each reported source reduction activity, facilities may estimate the resulting annual reduction in chemical waste using the following codes:

R1: 100% (total elimination)

R4: ≥15% but <25%

R2: ≥50% but <100%

R5: ≥5% but <15%

R3: ≥25% but <50%

R6: >0% but <5%



Rationale and Considerations

- Rationale:
 - Make it easier to report and assess the effectiveness of different types of source reduction activities
 - Promote the adoption and recognition of successful pollution prevention practices
 - Mirror reporting of treatment methods and efficiencies
- Considerations / topics for input:
 - Facility perspectives on ease and utility of providing this information
 - Response format (e.g., percentage ranges)



Utility of Reporting Reduction Estimates

- The [TRI P2 Tool](#) currently sorts reported P2 practices by largest year-to-year decreases in TRI quantities; new data field would provide a more direct method for identifying largest P2 achievements

Show entries Showing 1 to 10 of 19 entries Search:

FACILITY NAME	ADDRESS	YEAR	PRIOR YEAR RELEASE *	CURRENT YEAR RELEASE *	PERCENT CHANGE	POLLUTION PREVENTION INFORMATION (ACTIVITY CODES)(TEXT)
WARWICK MILLS INC P2 Details	301 TURNPIKE RD, NEW IPSWICH, NH 03071	2008	55,048.00	1,240.00	-97.75%	<i>W58: Other process modifications</i> Continued use of thermal oxydation process using fire tube boilers for heat recovery.
COOLEY INC P2 Details	50 ESTEN AVE, PAWTUCKET, RI 02860	2007	13,797.00	5,517.00	-60.01%	Emissions decreased considerably in cy07 for a couple of main reasons. In cy2007, cooley, inc. Had a significant decrease in usage/Demand of higher voc/Hap coatings. Water based coatings are being used much more frequently. In cy2007, cooley, inc. Changed from 95.2% control efficiency and 100% capture efficiency recuperative thermal oxidizer to a 98% control efficiency regenerative thermal oxidizer (Rto) and 100% capture efficiency.
SEAMAN CORP - BRISTOL PLANT P2 Details	225 N INDUSTRIAL DR, BRISTOL, TN 37620	2011	2,492.00	1,169.00	-53.09%	<i>W42: Substituted raw materials</i> Method(s) to Identify P2 Activities: <i>T04 [Participative Team Management]</i> - Developed non-toluene containing versions of this formulation for certain product applications
JAYBIRD & MAIS INC P2 Details	360 MERRIMACK ST, LAWRENCE, MA 01843	2011	196.00	95.00	-51.53%	<i>W73: Substituted coating materials used</i> Method(s) to Identify P2 Activities: <i>T10 [Vendor Assistance]</i> - Vendor reformulated adhesives
AVERY DENNISON RBIS LENOIR P2 Details	950 GERMAN ST, LENOIR, NC 28645	2011	2,218.00	1,089.00	-50.9%	<i>W58: Other process modifications</i> Sales volumes decreased greatly in the solvent based production as more customers moved to water based inks.
JESSUP MANUFACTURING CO	1701 ROCKLAND RD, LAKE BLUFF,	2009	5,206.00	3,006.00	-42.26%	Near the end of 2008, we purchased and installed a new regenerative thermal oxidizer to capture and incinerate a larger percentage of our VOM emissions and reduce our natrual gas usage. Our FESOP permit was also revised and reissued at this time.



2) Optional Barrier Codes

- Proposed new instructions in TRI-MEweb:
 - If you wish to provide details on any barriers your facility faces in implementing additional source reduction, recycling or pollution control activities, EPA encourages you to **select one or more of the following barrier categories from the checklist below** and describe specifically how the selected barrier category(s) applies to your facility:
 - Insufficient capital to install new source reduction equipment or implement new source reduction activities/initiatives.
 - Require technical information on pollution prevention techniques applicable to specific production processes.
 - Concern that product quality may decline as a result of source reduction.
 - Source reduction activities were implemented but were unsuccessful.
 - Specific regulatory/permit burdens.
 - Pollution prevention previously implemented- additional reduction does not appear technically or economically feasible.
 - Each category you select in TRI-MEweb will be included in your Section 8.11 entry, followed by the additional details you provided on that topic (if any).



How New Functionality Would Work

- Insufficient capital to install new source reduction equipment or implement new source reduction activities/initiatives.
- Require technical information on pollution prevention techniques applicable to specific production processes.
- Concern that product quality may decline as a result of source reduction.
- Source reduction activities were implemented but were unsuccessful.
- Specific regulatory/permit burdens.
- Pollution prevention previously implemented- additional reduction does not appear technically or economically feasible.

Source reduction activities implemented during prior years and continued during 2012 include: Process bath analysis, employee training, regular equipment inspections and preventive maintenance to minimize spills and leaks. Quality assurance requirements (NADCAP, AS9100, etc.) and concern for Aircraft safety preclude further source reduction activity.



Rationale and Considerations

- Rationale:
 - Provides context to the community about why releases are occurring
 - Allows EPA to assist facilities in overcoming barriers when appropriate
 - Organizes information that until now has been free-text only (EPA received thousands of § 8.11 entries about barriers to P2 in RY '13)
 - This facilitates quantitative analysis and search/filter capabilities
- Considerations / topics for input:
 - Facility perspectives on ease and utility of providing this information
 - Response format (e.g., which categories to provide)



3. Categories for Free-Text Info

- Current § 9.1 interface in TRI-MEweb (single text box):

The screenshot shows the TRI-MEweb interface. At the top left is the EPA logo and the text 'TRI-ME WEB'. To the right, it says 'Logged in as: TUTORIAL_1, Test Facility'. Below this is a navigation bar with tabs: 'Welcome', 'My Facilities', 'Prepare' (which is highlighted), 'Validate', 'Transmit', 'Review', and 'eFDP'. Underneath the navigation bar is a menu with options: 'Select Year', 'Select Facility', 'Forms', 'Waste Management', 'On-site Release/Disposal', 'On-site Waste Mgmt', 'Off-site Transfer', 'Source Reduction/Recycling', 'Misc Info' (which is highlighted), and 'Summary'. The main content area is titled 'Miscellaneous Information' and includes the text '(Form R, Part II, Section 9.1)'. On the right side of this section, it says 'Test Facility Cambridg' and '0213WZBRTSE'. At the bottom right of the section, it says '2012 Form R for 1,2,4-Trimethylbe'.

Attention: Beginning in RY 2012, you may enter additional information regarding revisions, data quality alerts and Production Ratio or Activity Index data in Section 9.1.

If you wish to submit any miscellaneous, additional, or optional information regarding your Form R Submission, provide it here.

Examples of this information can include:

- Facility closure
- Explanations for changes in release quantities
- Changes in production
- Calculation methods, e.g. emission factors
- Staffing changes

Please limit your text to less than 4,000 characters. You may enter 3927 additional characters in the text fields on this page.



Proposed New § 9.1 Interface

- If you wish to submit any miscellaneous, additional or optional information, provide it here. You may indicate that you are submitting information pertaining to one or more of the following topics by checking a box next to the topic to which your information pertains:

- Changes in Production Levels
- Calculation Methods, e.g., Emission Factors
- One-time or Intermittent Events Impacting Reported Quantities
- Issues or Difficulties Encountered in Submitting Form
- Staffing Changes
- Additional Contact Info
- No TRI Reports Expected for this TRIFID Next Year
- No TRI Report Expected for this Chemical Next Year
- Other Miscellaneous Information:



Use of New Checkboxes

- If you wish to submit any miscellaneous, additional or optional information, provide it here. You may indicate that you are submitting information pertaining to one or more of the following topics by checking a box next to the topic to which your information pertains:

Changes in Production Levels

Calculation Methods, e.g., Emission Factors:

Use of updated emission factors resulted in higher release numbers for 2013.

One-time or Intermittent Events Impacting Reported Quantities

Issues or Difficulties Encountered in Submitting Form

Staffing Changes

Additional Contact Info

No TRI Reports Expected for this TRIFID Next Year

No TRI Report Expected for this Chemical Next Year

Other Miscellaneous Information:



Proposed Categories for § 8.11

- Proposed new instructions in TRI-MEweb:
 - If you wish, enter optional additional information on source reduction, recycling, or pollution control below. Providing this information is an opportunity to highlight the steps your facility has taken to reduce amounts of toxic chemicals entering the environment.
 - You may indicate that you are submitting information pertaining to one or more of the following topics by checking a box next to the topic to which your information pertains:
 - Source Reduction
 - Recycling
 - Energy Recovery
 - Waste Treatment
 - General Environmental Management
 - Methods for Identifying Pollution Prevention Opportunities
 - Other Optional Pollution Prevention Information:

A large, empty rectangular text input field with a vertical scrollbar on the right side, intended for providing additional information as described in the list above.



Utility of Optional Free Text Information

- Optional information on pollution prevention, barriers to P2 and other topics provides context on your TRI chemical quantities to data users.

Production Related Waste Management for Selected Chemical

For more on the Waste Management Hierarchy, see the Pollution Prevention [Overview](#) page

Management of N-Butyl Alcohol
at Facility MORGAN OLSON LLC

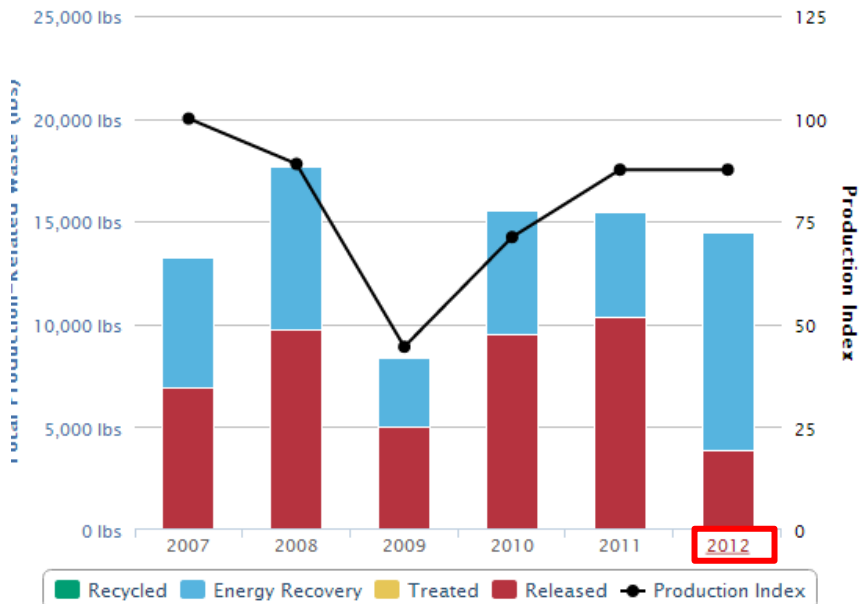


Chart Options:

- Display waste quantities only
- Display production index

Waste Management Comparison – Select Year: 2012

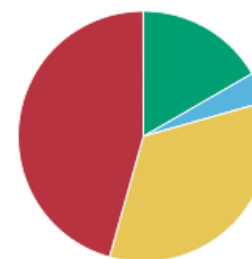
MORGAN OLSON LLC



- Recycled
- Energy Recovery
- Treated
- Released

Total for N-Butyl Alcohol: 14,437 lbs

All other NAICS 336 – Transportation Equipment
1 185 other TRI reporters, 90 reporting N-Butyl Alcohol



- Recycled
- Energy Recovery
- Treated
- Released

Total for N-Butyl Alcohol: 8 million lbs



Utility of Optional Free Text Information

- P2 and miscellaneous information can be accessed in the [TRI P2 Tool](#) by clicking on the applicable reporting year.

Production Related Waste Management for Selected Chemical

For more on the Waste Management Hierarchy, see the Pollution Prevention [Overview](#) page

Management of N-Butyl Alcohol
at Facility MORGAN OLSON LLC



Waste Management Comparison – Select Year:

[< Return to Graph](#)

Section 8.10: Newly Implemented Source Reduction Activity

W74: Improved application techniques

Section 8.11: Optional Pollution Prevention Information

T11: Improved process as part of our Lean Initiatives, reducing the number of painted trucks that needed to go through booths for rework.

T11: Improved process as part of our Lean Initiatives, reducing the number of painted trucks that needed to go through booths for rework.

Information About Production Index

Production variable: Number of trucks produced

Miscellaneous Information

Changed the method of applying line flush to waste pickup, giving more accurate balance to waste stream.

Chart Options:

- Display waste quantities only
- Display [production index](#)

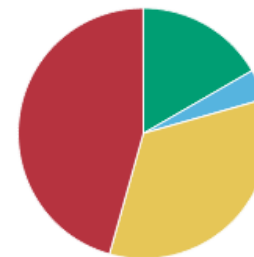
MORGAN OLSON LLC



Total for N-Butyl Alcohol: 14,437 lbs

All other NAICS 336 – Transportation Equipment

1 185 other TRI reporters, 90 reporting N-Butyl Alcohol



Total for N-Butyl Alcohol: 8 million lbs



Other Changes to Form R, Section 8

SECTION 8. SOURCE REDUCTION AND WASTE MANAGEMENT		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1 – 8.7 Production-Related Waste Managed					
8.1a	Total on-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills				
8.1b	Total other on-site disposal or other releases				
8.1c	Total off-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills				
8.1d	Total other off-site disposal or other releases				
8.2	Quantity used for energy recovery on-site				
8.3	Quantity used for energy recovery off-site				
8.4	Quantity recycled on-site				
8.5	Quantity recycled off-site				
8.6	Quantity treated on-site				
8.7	Quantity treated off-site				
8.8	Non -production-related waste managed**				
8.9	<input type="checkbox"/> Production ratio or <input type="checkbox"/> Activity ratio (select one and enter value to right)				



Changes to Form R, Section 5

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ON-SITE

			A. Total Release (pounds/year*) (Enter a range code** or estimate)	B. Basis of Estimate (Enter code)	C. Percent from Stormwater
5.1	Fugitive or non-point air emissions	NA <input type="checkbox"/>			
5.2	Stack or point air emissions	NA <input type="checkbox"/>			
5.3	Discharges to receiving streams or water bodies (Enter one name per box)	NA <input type="checkbox"/>			
	Stream or Water Body Name	Reach Code (optional)			
5.3.1					
5.3.2					

		NA	A. Total Release (pounds/year*) (Enter a range code** or estimate)	B. Basis of Estimate (Enter code)
5.4-5.5	Disposal to land on-site			
5.4.1	Class I Underground Injection Wells	<input type="checkbox"/>		
5.4.2	Class II-V Underground Injection Wells	<input type="checkbox"/>		
5.5.1A	RCRA Subtitle C landfills	<input type="checkbox"/>		



For More Information

- How to Provide Input
 - Comments submitted in your webinar chat window or online at <http://www.regulations.gov/#!docketDetail;D=EPA-HQ-OEI-2013-0803> will be included in the docket.
- TRI Contact Info
 - ICR Lead: Cassandra Vail, vail.cassandra@epa.gov
 - P2 Lead: Daniel Teitelbaum, teitelbaum.daniel@epa.gov
- TRI Website
 - www.epa.gov/tri