



# 2020

# Things to Watch for with TRI Reporting (RY2020)

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## Toxic Release Inventory (TRI) Reporting Best Practices

### ▶ Common Challenges

- Misunderstanding and misinterpretation of TRI instructions and guidance documents
- Missed reporting of TRI chemicals
- Misalignment of TRI reporting with other environmental reporting (annual air emissions report, annual waste report, wastewater discharge report, etc.)

### ▶ Threshold Determinations

- Ensure threshold determinations are done for all reportable chemicals, even if you do not need to report (EPA generally spends about 80% of compliance inspection on threshold determinations)
- Some thresholds are low
  - ◆ Mercury = 10 lbs
  - ◆ Lead = 100 lbs
- Include all byproducts (HF from CF<sub>4</sub>) and emissions (ammonia from ammonium hydroxide)
- Chemical categories are easily missed (copper compounds, glycol ethers, etc.)
- Safety Data Sheets can be incorrect for TRI chemicals (or may not be reviewed properly)
- Do not depend on EPA List of Lists to have all TRI chemicals and always to be accurate
- Acid aerosols are commonly miscalculated (e.g., same molecule can be counted numerous times for threshold determinations)
- Fuel burning TRI chemicals and non-production TRI chemicals need to be included
- Need good purchasing or usage records
- Article exemption can be used but has criteria

### ▶ Environmental Emissions

- Use mass balance to ensure all is accounted for
- Document emissions calculations
- Report RCRA empty containers sent back to chemicals and gas suppliers
- Report all treatment methods even if efficiency is 0%
- Report wastewater discharge with pH less than 6; it contains acid being discharged (e.g., nitric acid is discharged to POTW if pH is below 6 any time during year)
- Use of "0" instead of N/A if any emissions could occur

### ▶ Other

- Make sure to have TRI-ME web certifier approved in advance
- EPA Audit Policy for self-reporting missed TRI chemicals
- New for RY2020- 172 PFAS (per- and polyfluoroalkyl substances) were added to the TRI chemical list
- Reporting threshold for PFAS is 100 lbs for each listed PFAS chemical
- De minimis level of 1% applies to all PFAS except Perfluorooctanoic acid (PFOA) which has a 0.1% de minimis level

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