

# 2016 Compliance Assistance Conference

Emergency Planning and Community  
Right-to-Know Act (EPCRA)  
Right to Know (RTK)

**Jeff Beattie**

Division of Air Pollution Control



# RTK Intent

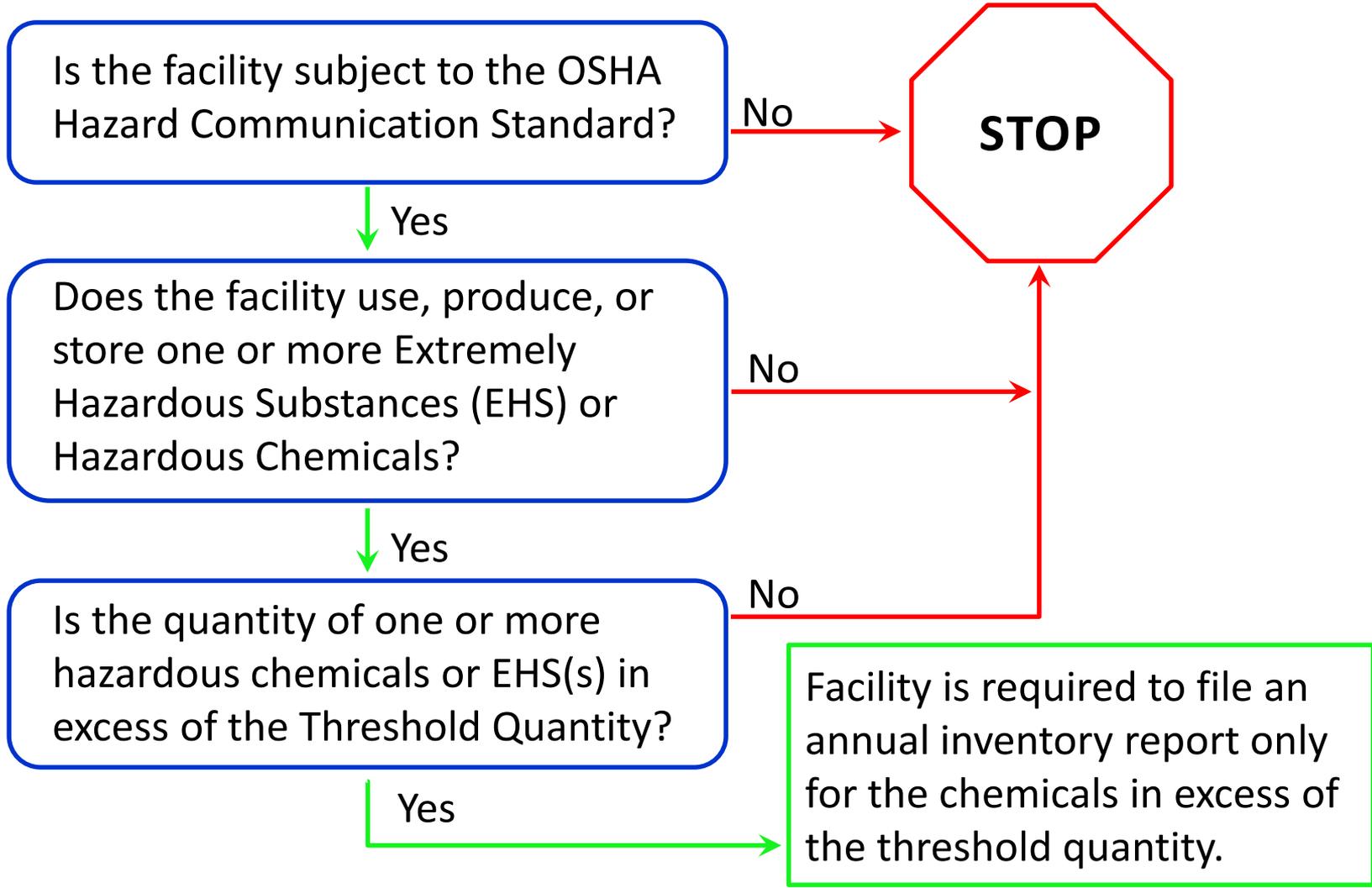
- Emergency Planning
  - ✓ Information Gathering and Management
  - ✓ Hazard Analysis (EHS facilities)
  - ✓ County HazMat Plan Development/Exercise
- Community Right-to-Know
  - ✓ The public can request facility specific information

# Who Must Report

- Facility that is subject to the OSHA Hazard Communication Standard, 1910.1200.
- Facility has one or more Extremely Hazardous Substances (EHS)
  - ✓ There is a **published list** of Extremely Hazardous Chemicals of approximately 360 chemicals. List is available in the Right to Know Reporting Booklet
  - ✓ **Threshold Quantity ranges from 1 to 500 pounds**
    - Examples include:
      - Ammonia (500 pounds)
      - Chlorine (100 pounds)
      - Sarin (10 pounds)
      - Sulfuric Acid (500 pounds)

# Who Must Report Continued

- Facility has one or more hazardous chemicals
- There is **no comprehensive list** of hazardous chemicals
- The term “Hazardous Chemical” refers to any chemical, chemical compound or mixture with health hazard or physical hazard characteristics
  - ✓ Examine MSDS for words such as:
    - Carcinogen, Irritant, Corrosive, Toxic Agent, Combustible, Compressed Gas, Explosive, Flammable, Organic, Reactive, Unstable (Reactive), Etc.
  - ✓ Examples of hazardous chemicals include gasoline and 1,1,1-trichloroethane
- **Threshold Quantity is 10,000 pounds or more**



# Reporting Exemptions

- Any food, food additive, color additive, drug, or cosmetic regulated by the Food and Drug Administration
- Any substance present as a solid in any manufactured item to the extent exposure to the substance does not occur under normal conditions of use
- Any substance to the extent it is used for personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution and used by the general public

# Reporting Exemptions Continued

- Any substance to the extent it is in used a research laboratory or a hospital or other medical facility under the direct supervision of a technically qualified individual
- Any substance to the extent it is used in routine agricultural operations or is a fertilizer held for sale by a retailer to the ultimate customer

# Rule Changes

July 13, 2012, EPA published the final rule in the [Federal Register](#) that **revises the Tier Two form** by adding mandatory and optional data elements. It also revises some existing data elements in the chemical reporting section.

- Maximum # of Occupants
- Facility manned or Unmanned
- TRI Facility ID#
- RMP Facility ID#
- Facility Subject to RMP (yes/no)
- Reporting Ranges “Narrowed”

# Rule Changes

July 13, 2010, EPA published guidance in the [Federal Register](#) regarding the **Hazardous Chemical Exemption** for Solids under SARA Title III section 311(e)(2): "any substance present as a solid in any manufactured item to the extent exposure to the substance does not occur under normal conditions of use."

- Consider the amount of fume or dust emitted or released from a manufactured solid that is being modified. This interpretation applies to metal, bricks, and any other manufactured solid item that undergoes a modification process. It does not apply to lead in batteries.

# Trade Secrets Claims

- Trade Secret Substantiation with USEPA includes substantiation form, questions, and certification statement.
- Submitter-Devised Forms will not be accepted
- Must Submit to U.S. EPA a Sanitized and Unsanitized Report to U.S. EPA
  - ✓ Please see “Instructions for Completing the EPCRA Trade Secret Substantiation Form”

# Trade Secrets Claims

- Send Claims to: EPCRA Trade Secret  
c/o CGI Federal, Inc.  
PO Box 10162  
Fairfax, VA 22038
- Must send sanitized copies of the report form and substantiation to state and local offices.

# Claiming Storage Location as Confidential

- Location information claimed as confidential is not to be submitted to USEPA. It is a state issue.
- Claim is made on the chemical inventory report that is submitted to SERC, LEPC, and jurisdictional fire department.
- Location information is to be submitted either on inventory report and will be redacted for any public information requests or the facility can provide a sanitized and unsanitized report for file.

# Ohio Trade Secret & Location Confidential Claims

- 17 chemical companies have “Trade Secret Substantiation” claims documented with USEPA, but the Ohio SERC has 76 or so companies claiming “Trade Secret” without USEPA approval.
  - ✓ Ohio SERC has contacted these facilities which checked the “Trade Secret” box on the reporting form to remind the facilities of US EPA’s trade secret requirements.
    - Several facilities are filing revisions which do not include a claim for trade secret.
- 963 facilities have requested “Location Confidential” for one or more chemicals being reported at their location.

# Who is Reporting?

- Large Chemical Manufacturers
- Refineries
- Paint Manufacturers
- Hospitals
- Petroleum Distributors
- Trucking Companies
- Liquid Propane (LPG) Distributors
- Concrete Companies
- Cold Storage facilities
- Agricultural Dealers
- Private WWTP/WTP
- Asphalt Plants
- Gasoline Stations
- Oil & Gas Extraction Sites

# Reporting Overview

- Reports are due annually on March 1 for the previous calendar year.
- One report covers the entire facility and includes information on any chemical for which the reporting threshold was exceeded.
- A complete report consists of the following parts:
  - ✓ Facility Identification Form
  - ✓ Emergency & Hazardous Inventory Form(s)
  - ✓ Site Map
  - ✓ Annual Filing Fee

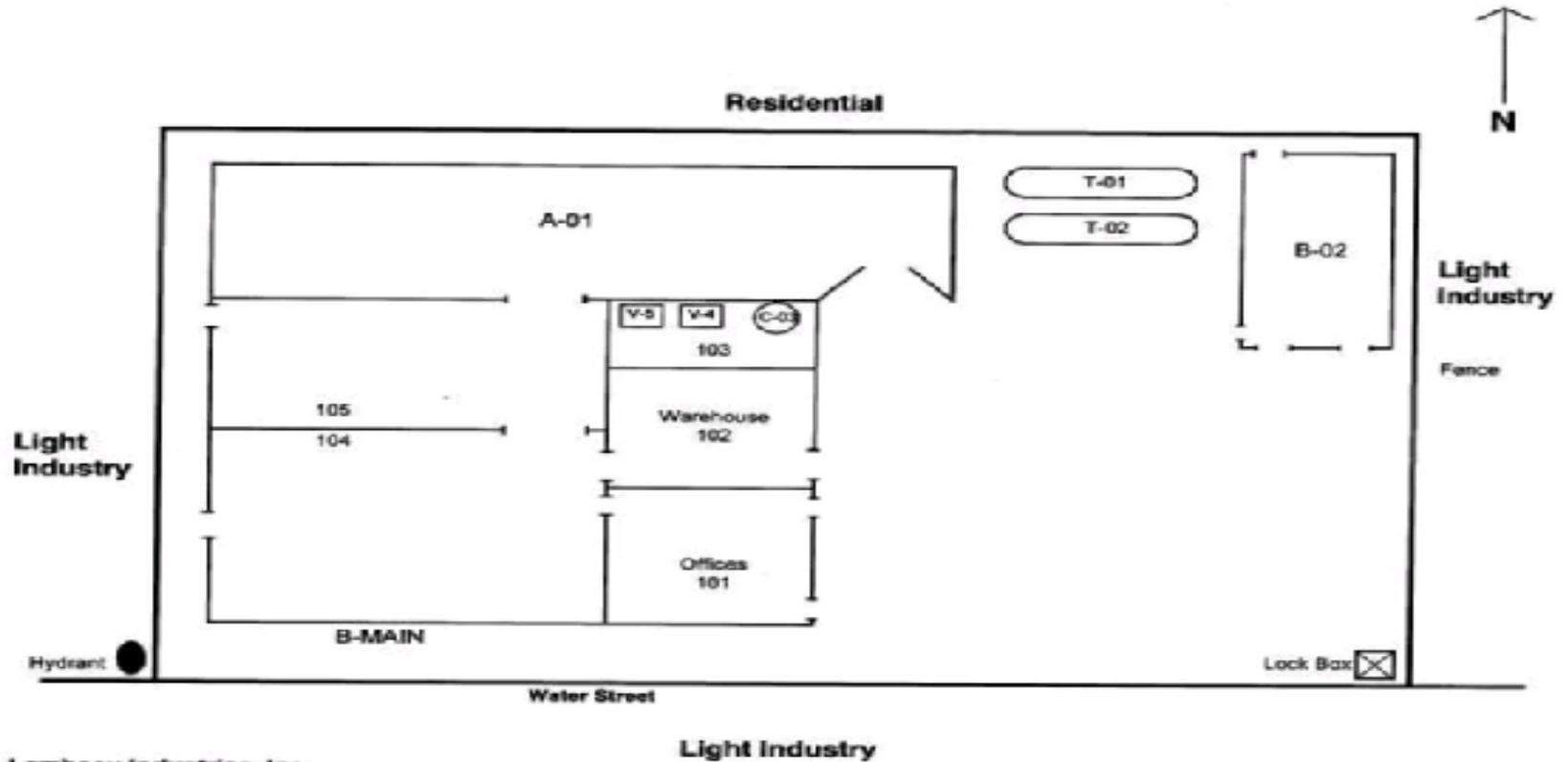
# Facility Identification Form

- County
- Parent Company information
- Facility information
- Facility Emergency Contact Names & Phone Numbers
- Permit Numbers
- Certification

# Emergency & Hazardous Inventory Form

- Facility Name/Address
- CAS Registry Number
- Chemical Name(s)
- Physical/Health Hazards
- Specific Storage Location
- Storage Containment Type
- Temperature/Pressure Conditions
- Amount

# Site Map



Lambeau Industries, Inc.  
4 Green Bay Drive  
Favreburg, Ohio 01963  
(02/23/2005)

(1 inch = approximately 42 feet)

# Reporting Form Continued

- You have the option of completing a hard copy form, or U.S. EPA's reporting software (Tier2Submit)
  - ✓ Software is FREE and can be downloaded from the internet at: [epa.gov/epcra/tier2-submit-software](http://epa.gov/epcra/tier2-submit-software)
  - ✓ The validation program checks for basic information and data entry errors
  - ✓ It is easy to import/export and update data.
  - ✓ Software was designed for compatibility with the CAMEO software which is a software program used by emergency responders in the areas of planning, preparedness, and response

# Filing Fee Schedule

## Industry

- Base Fee of \$150
- Additional fee of \$20 for each hazardous chemical reported
- Additional fee of \$150 for each EHS reported
- Maximum Fee = \$2,500
- Late Fee Penalty – 10% for reports filed after March 31

# Filing Fee Schedule

## Oil & Gas

- Base Fee of \$50
- Additional fee of \$10 for each oil and gas well after the 25th
- Maximum Fee = \$900
- Late Fee Penalty – 10% for reports filed after March 31

# Where Do I Send the Report?

Send the Original Report to:

- ✓ State Emergency Response Commission (SERC)  
50 West Town Street  
PO Box 1049  
Columbus, OH 43216-1049

Send a copy to:

- ✓ (County) Local Emergency Planning Committee (LEPC)
- ✓ Jurisdictional Fire Department

# Tier II Reporting Procedure

- Tier II reports that have been submitted using
  - ✓ Paper reports
    - Ohio reporting form or US EPA's reporting form
  - ✓ Tier 2 Submit (US EPA's software) submitted by CD or e mail.
- Paper will still be accepted.
  - ✓ Paper reports must include the new fields and reporting ranges.



## Welcome to Tier2 Submit 2015 !

Tier2 Submit is the personal computer software program that helps facilities electronically report Tier II information for Section 312 of the Emergency Planning and Community Right to Know Act (EPCRA).

In addition to providing data fields for the information required under EPCRA, this program also provides data fields to allow you to submit additional information requested or required by States. After you choose your state abbreviation from the pull down menu on the first screen, the program will load any data fields specific for your State.

Facilities can find information about Federal Tier II requirements as well as individual State requirements at

[EPA Tier II Webpage](#)

If you need help while operating Tier2 Submit or if you need assistance submitting your Tier II information click the Help button at the top of any module for the User's Manual.

Start Tier2 Submit

Quit

View List

Chem Inventory List

Contact List

New Facility

Quick Report

Help



1

of 1 total

## Facilities

Last Modified 11/30/2015

Facility Name \*

If different, include both company name and facility name in the facility name field. List company name first.

Department

Report Year \*

2015

Location

ID and Regs

Contacts

State Fields

Attachments

Certification

Location Where Hazardous Chemicals are Present

Mailing Address (if different)

Street \*

City \*

State \*

Zip \*

County

Fire District

Country

Emergency 24-Hour Phone Number

Enter lat/long values in decimal degrees (use a negative number for Western hemisphere longitude).

[Need help finding your lat/long values?](#)

Latitude \*

Longitude \*

A red \* indicates a federal or state requirement.

View List

Chem Inventory List

Contact List

New Facility

Quick Report

Help



1

of 1 total

**Facilities**

Last Modified 11/30/2015

Facility Name \*

If different, include both company name and facility name in the facility name field. List company name first.

Department

Report Year \* 2015

Location

ID and Regs

Contacts

State Fields

Attachments

Certification

| ID Type          | ID                   | Description |                                       |
|------------------|----------------------|-------------|---------------------------------------|
| Dun & Bradstreet | <input type="text"/> |             | <input type="button" value="Delete"/> |
| NAICS            | <input type="text"/> |             | <input type="button" value="Delete"/> |
|                  | <input type="text"/> |             | <input type="button" value="Delete"/> |

Is the facility manned? \*  Manned  Unmanned

Maximum No. of Occupants \*

Subject to Chemical Accident Prevention under Section 112(r) of CAA (40 CFR part 68, Risk Management Program)? \*  Yes  No

Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)? \* .....  Yes  No

A red \* indicates a federal or state requirement.

**Contacts**

Last Modified 11/30/2015

(Last or Business Name)

|            |                                  |       |                      |       |                      |
|------------|----------------------------------|-------|----------------------|-------|----------------------|
| First Name | <input type="text"/>             | Last  | <input type="text"/> | Title | <input type="text"/> |
| Address    | <input type="text"/>             |       |                      |       |                      |
| City       | <input type="text"/>             | State | <input type="text"/> | Zip   | <input type="text"/> |
| Country    | <input type="text" value="USA"/> | Email | <input type="text"/> |       |                      |

**Phone Type**

**Phone #**

| Phone Type           | Phone #              | Delete                                |
|----------------------|----------------------|---------------------------------------|
| <input type="text"/> | <input type="text"/> | <input type="button" value="Delete"/> |
| 24-hour              | <input type="text"/> | <input type="button" value="Delete"/> |
| Emergency            | <input type="text"/> | <input type="button" value="Delete"/> |
| FAX                  | <input type="text"/> | <input type="button" value="Delete"/> |
| Home                 | <input type="text"/> | <input type="button" value="Delete"/> |
| Mobile - Cell        | <input type="text"/> | <input type="button" value="Delete"/> |
| Work                 | <input type="text"/> | <input type="button" value="Delete"/> |

**Contact Type**

|                      |                                  |
|----------------------|----------------------------------|
| <input type="text"/> | <input type="button" value="v"/> |

A red \* indicates a federal or state requirement.

**Done**

**Cancel**

### Contacts

Last Modified 11/30/2015

(Last or Business Name)

First Name  Last  Title

Address

City  State  Zip

Country  Email

#### Phone Type

#### Phone #

| Phone Type           | Phone #              | Delete                                |
|----------------------|----------------------|---------------------------------------|
| <input type="text"/> | <input type="text"/> | <input type="button" value="Delete"/> |
| <input type="text"/> | <input type="text"/> | <input type="button" value="Delete"/> |
| <input type="text"/> | <input type="text"/> | <input type="button" value="Delete"/> |
| <input type="text"/> | <input type="text"/> | <input type="button" value="Delete"/> |

#### Contact Type

- Emergency Contact
- Owner / Operator
- Fac. Emergency Coordinator
- Parent Company
- Tier II Information Contact
- Submitter
- Billing
- Fire Department
- Other
- Edit...

A red \* indicates a federal or state requirement.

View List

Facility Record

Contact List

New Chemical In Inventory

Help

Back / Close

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of 1 total

## Chemicals in Inventory

Last Modified 11/30/2015

Facility Name

Report Year

2015

City

State

CAS #

EHS\*  Yes  No Trade Secret

Chem Name\*

Lookup Chemical Name

## Physical State &amp; Quantity

## Storage Locations

## Mixture Components

## State Fields

## Physical State\*

- 
- Pure
- 
- 
- Mixture

- 
- Solid
- 
- 
- Liquid
- 
- 
- Gas

## Hazards\*

- 
- Fire
- 
- 
- Sudden Release of Pressure
- 
- 
- Reactive

## Health Effects\*

- 
- Acute
- 
- 
- Chronic

Check all that apply

Chemical information identical to previous year Days On Site\* Below Reporting Thresholds Max Daily Amount  poundsMax Code\* Average Daily Amount  poundsAve Code\* Max amount in largest container  pounds

A red \* indicates a federal or state requirement.

View List

Facility Record

Contact List

New Chemical In Inventory

Help

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1 of 1 total

### Chemicals in Inventory

Last Modified 11/30/2015

Facility Name

Report Year 2015

City

State

CAS #

Chem Name\*

EHS\*  Yes  No

Trade Secret

Lookup Chemical Name

#### Physical State & Quantity

#### Storage Locations

#### State Fields

##### Physical State\*

- Pure
- Mixture
- Solid
- Liquid
- Gas

##### Hazards\*

- Fire
- Sudden Release of Pres
- Reactive

Check all that apply

##### Health Effects\*

- Acute
- Chronic

Chemical information identical to previous year

Days On Site\*

Low Reporting Thresholds

Max Daily Amount  pounds

Max Code\*

Average Daily Amount  pounds

Ave Code\*

Max amount in largest container  pounds

- 01 0 - 99 pounds
- 02 100 - 499 pounds
- 03 500 - 999 pounds
- 04 1,000 - 4,999 pounds
- 05 5,000 - 9,999 pounds
- 06 10,000 - 24,999 pounds
- 07 25,000 - 49,999 pounds
- 08 50,000 - 74,999 pounds
- 09 75,000 - 99,999 pounds
- 10 100,000 - 499,999 pounds
- 11 500,000 - 999,999 pounds
- 12 1,000,000 - 9,999,999 pounds
- 13 10 million+ pounds

A red \* indicates a federal or state requirement.

View List

Facility Record

Contact List

New Chemical In Inventory

Help

Back / Close

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of 1 total

### Chemicals in Inventory

Last Modified 11/30/2015

Facility Name   
Report Year  City  State

CAS #  EHS\*  Yes  No  Trade Secret  
Chem Name\*

Physical State & Quantity

**Storage Locations**

Mixture Components

State Fields

Confidential

| Location at Facility* | Type*                | Pressure*            | Temperature*         | Max Amount           | Delete                                |
|-----------------------|----------------------|----------------------|----------------------|----------------------|---------------------------------------|
| <input type="text"/>  | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="button" value="Delete"/> |
|                       |                      |                      |                      |                      |                                       |
|                       |                      |                      |                      |                      |                                       |
|                       |                      |                      |                      |                      |                                       |
|                       |                      |                      |                      |                      |                                       |
|                       |                      |                      |                      |                      |                                       |

Each row represents one storage location

A red \* indicates a federal or state requirement.

View List

Facility Record

Contact List

New Chemical In Inventory

Help

Back / Close



1 of 1 total

**Chemicals in Inventory**

Last Modified 11/30/2015

Facility Name

Report Year  City  State

CAS #  EHS\*  Yes  No  Trade Secret

Chem Name\*

Physical State & Quantity

**Storage Locations**

Mixture Components

State Fields

Confidential

Location at Facility\*  Max Amount

Type\*  Pressure\*  Temperature\*

- Above ground tank
- Bag
- Battery
- Below ground tank
- Box
- Can
- Carboy
- Cylinder
- Fiber Drum
- Glass bottles or jugs
- Plastic bottles or jugs
- Plastic or non-metallic drum
- Rail car

Each row represents one storage location

A red \* indicates a federal or state requirement.

View List

Facility Record

Contact List

New Chemical In Inventory

Help

Back / Close

1 of 1 total

**Chemicals in Inventory**

Last Modified 11/30/2015

Facility Name   
 Report Year  City  State

CAS #  EHS\*  Yes  No  Trade Secret  
 Chem Name\*

Physical State & Quantity

**Storage Locations**

Mixture Components

State Fields

Confidential

| Location at Facility* | Type*                | Pressure*                     | Temperature*         | Max Amount           | Delete                                |
|-----------------------|----------------------|-------------------------------|----------------------|----------------------|---------------------------------------|
| <input type="text"/>  | <input type="text"/> | <input type="text"/>          | <input type="text"/> | <input type="text"/> | <input type="button" value="Delete"/> |
|                       |                      | Ambient pressure              |                      |                      |                                       |
|                       |                      | Greater than ambient pressure |                      |                      |                                       |
|                       |                      | Less than ambient pressure    |                      |                      |                                       |
|                       |                      |                               |                      |                      |                                       |
|                       |                      |                               |                      |                      |                                       |
|                       |                      |                               |                      |                      |                                       |

Each row represents one storage location

A red \* indicates a federal or state requirement.

View List

Facility Record

Contact List

New Chemical In Inventory

Help

Back / Close



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of 1 total

## Chemicals in Inventory

Last Modified 11/30/2015

Facility Name

Report Year

2015

City

State

CAS #

EHS\*

 Yes  No

Trade Secret

Chem Name\*

Lookup Chemical Name

Physical State &amp; Quantity

Storage Locations

Mixture Components

State Fields

 Confidential

Location at Facility\*

Max Amount

Delete

Type\*

Pressure\*

Temperature\*

Ambient temperature

Cryogenic conditions

Greater than ambient temperature

Less than ambient temp. / not cryog

Each row represents one storage location

A red \* indicates a federal or state requirement.

Tier2Submit2015

File Edit Record Search Scripts Help

Open  
Close Ctrl+W  
Import\Export  
Make KML File  
Make Validation Report  
Create Submission  
Exit Ctrl+Q

History List | Contact List | New Facility | Quick Report | Help | 1 of 1 total

Last Modified 11/30/2015

If different, include both company name and facility name in the facility name field. List company name first.

Report Year \* 2015

Location ID and Regs Contacts State Fields Attachments Certification

Location Where Hazardous Chemicals are Present Mailing Address (if different)

Street \*  
City \* State \* Zip \*  
County Fire District Country USA  
Emergency 24-Hour Phone Number  
*Enter lat/long values in decimal degrees (use a negative number for Western hemisphere longitude).*  
[Need help finding your lat/long values?](#)  
Latitude \* Longitude \*

A red \* indicates a federal or state requirement.

### Tier2 Submit

Select records to include for submission:

- Current Record (Worthington Steel)
- Found Set (33 records)
- All Records

Start Submission Validation

Cancel

**Tier2 Submit Validation Check Status:**  
**PASSED**

[View Validation Report](#)

**Steps for submitting your Tier2 Information**

**(1) First check your state's submission requirements:**

[State Submission Requirements](#)

**(2) Select a submission method that is accepted by your state:**

A submission file (.t2s) containing all of the fields supported by Tier2 Submit.

[Create Electronic Submission File](#)

A paper report containing all of the fields supported by Tier2 Submit.

[Create Paper Report](#)

**(3) Submit the file or printed report per your state submission requirements.**

The Tier II Inventory Form (PDF) is available from:

[EPA Website](#)

[Cancel](#)

**Tier Two**  
**Emergency and Hazardous Chemical Inventory**  
*Specific Information by Chemical*

Reporting Period: January 1 to December 31, 2015

Page 1

Printed: November 30, 2015

**Facility Name:** Abbott Nutrition Ross Park

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.....  
.....  
**FACILITY IDENTIFICATION:**

Abbott Nutrition Ross Park  
Dept:  
3300 Stelzer Road  
Columbus, OH 43219 USA  
County: Franklin  
Latitude: 40.039185  
Longitude: -82.906425  
Facility Phone: 614-624-4001

All facility information (not including chemical information) is identical to last year's submission

**IDENTIFICATION NUMBERS:**

Dun & Bradstreet: 62-780-5773  
NAICS: 311514 (Dry, Condensed, and Evaporated Dairy Product Manufacturing)

Is the facility manned?  Manned  Unmanned  
Maximum No. of Occupants: 900

**REGULATORY INFORMATION:**

Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)?  Yes  No  
Subject to Chem. Accident Prevention under Section 112(r) of CAA (40 CFR part 68, Risk Mgmt. Pgm.)?  Yes  No

**CONTACT INFORMATION:**

Rotonda, Charles  
Title: Safety Specialist    Contact Type 1: Emergency Contact    Contact Type 2: Tier II Information Contact    Contact Type 3:  
Fire Department  
Address: 3300 Stelzer Road, Columbus, OH, 43219 USA  
Phones: 24-hour: 614-787-6276    Work: 614-624-3056    24-hour: 614-787-6278  
Email: charles.rotonda@abbott.com

Schmiesing, Shanna  
Title: Safety Manager    Contact Type 1: Emergency Contact    Contact Type 2: Tier II Information Contact  
Address: 6480 Busch Blvd, Columbus, OH, 43229 USA  
Phones: 24-hour: 614-738-3770    Work: 614-624-5094  
Email: shanna.schmiesing@abbott.com

### Tier2 Submit Import/Export

Import Files

Batch (Multiple File) Import

Select one file in the folder containing all the files to be imported.

#### Select records to include for export:

Current Record (Abbott Nutrition Ross Park)

Found Set (ALL 1 RECORDS)

All Records

Include Attachments (Site Plan Files, etc.)

Export Files

( into a single .zip file )

Cancel

# LEPC Compliance Reports

- SFY 2014 (July 1, 2013 thru June 30th, 2014)
- SFY 2015 (July 1, 2014 thru June 30th, 2015)

|                                    | SFY 2014 | SFY 2015 |
|------------------------------------|----------|----------|
| # of EHS Facilities                | 3,373    | 3,541    |
| # of Hazardous Chemical Facilities | 5,001    | 4,783    |
| Total                              | 8,374    | 8,324    |
| Statewide Compliance Rate          | 92.9%    | 93.6%    |

# Information Management

## Portage County Reporting Facilities

Total Number of Reporting Facilities: **91**

# Facilities reporting one (1) or more EHS: **47**

# Facilities reporting one (1) or more hazardous substances: **44**

# Information Management

## Portage County Type of Facilities

- Communication (10+)
- Cable (4 +/-)
- A. Dule Pyle Inc
- Amerigas Propane
- Deerfield Farm Service
- Lite Metal Company
- Safety-Kleen Systems
- Swagelok Manufacturing Company
- The Hugo San Company
- Trelleborg Sealing Profiles
- Wildwater Kingdom

# Information Management

## Portage County Inventory Reported

### Extremely Hazardous Substances

- Ammonia (3+ facilities)
- Sulfuric Acid (34+ facilities)
- Hydrochloric Acid
- Sulfur Dioxide (2 facilities)
- Paraquat Dichloride
- Phenolic Acid
- Sulfur Trioxide
- Sulfocarbolic Acid

# Information Management

## Portage County Hazardous Substances

- Diesel Fuel (13+/- locations)
- #2 Fuel Oil (3+/- locations)
- Asphalt Cement
- Ammonium Phosphate Monobasic
- Calcium Magnesium Hydroxide
- Hydroxypropyl methacrylate
- Nitrogen
- N-tert-butyl-2-benzothiazole sulfonamide
- Silicon Rubber
- Sodium Lignosulfonate
- Zinc Oxide

# Release Reporting

## Regulated Substances:

- Extremely Hazardous Substances (40 CFR Part 355)
- CERCLA Hazardous Substances (40 CFR Part 302)
- Oil
  - ✓ Reportable Quantity (RQ) - a visible sheen on navigable waters
  - ✓ RQ - 25 gallons or more on land

# Verbal Notification

- Within 30 minutes upon discovery and/or knowledge
- Verbal notification must be made to:
  - ✓ Jurisdictional Fire Department
  - ✓ Ohio EPA Emergency Response (1-800-282-9378)
  - ✓ Local Emergency Planning Committee (LEPC) Emergency Coordinator

# Written Follow-Up Report

- “Due within 30 days of release”
- A written follow-up report must be submitted to:
  - ✓ Ohio EPA/DERR/Emergency Response  
Attention ER Records Management  
Lazarus Government Center  
50 West Town Street  
P.O. Box 1049  
Columbus, OH 43216-1049
  - ✓ Local Emergency Planning Committee Emergency  
Coordinator

# Ohio EPA Release Report Facts

| Type                          | Average # of Statewide Spills |
|-------------------------------|-------------------------------|
| Hydrocarbons                  | 44.8%                         |
| Sewage                        | 11.1%                         |
| Wastewater (NPDES violations) | 0.9%                          |
| Chemicals (Environment)       | 5.0%                          |
| Chemicals (Waste)             | 1.1%                          |
| Air Chemicals                 | 7.0%                          |

# Information Management

## Portage County Spills/Releases

| Type                     | Amount                                 |
|--------------------------|--|
| Transformer Oil          | 24 gallons                             |
| Diesel Fuel (8)          | 30 gal/75/50/unknown amount            |
| Crude Oil                | 42 gallons/2000 gallons/unknown amount |
| Tac Road                 | 900 gallons                            |
| Fuel Oil                 | 200/150/unknown amount                 |
| Sewage                   | Unknown amount                         |
| <b>Bentonite</b>         | Unknown amount                         |
| <b>Manure</b>            | Unknown amount                         |
| <b>Fish Kill</b>         | Unknown                                |
| <b>Ammonia</b>           | Unknown                                |
| <b>Greenish Material</b> | Unknown                                |
| <b>Gasoline</b>          | 23 Gallons/unknown amount              |

# For Additional Information

- Right to Know Contact at Ohio EPA

Jeff Beattie

[Jeffrey.Beattie@epa.gov](mailto:Jeffrey.Beattie@epa.gov)

888-644-2260 (toll free)

614-644-2269

[epa.ohio.gov/dapc/serc.aspx](http://epa.ohio.gov/dapc/serc.aspx)

- U.S. EPA Software Assistance

(703) 227-7650

[RMPRC@epacdx.net](mailto:RMPRC@epacdx.net)

# RTK in the News!

- “Haverhill Chemical schedules exercise for Saturday”
  - ✓ Portsmouth Daily Times - June 05, 2014
- “93 local sites store hazardous chemicals”
  - ✓ Springfield News Sun – April 18, 2013
- “Canton officials review inspection procedures after fire”
  - ✓ Canton Repository - Oct. 7, 2013

Questions?

# 2016 Compliance Assistance Conference

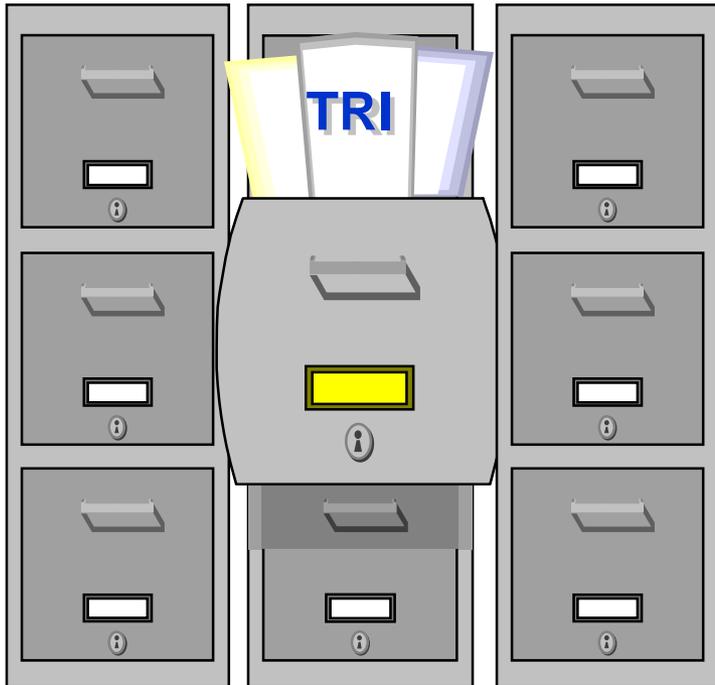
Emergency Planning and Community  
Right-to-Know Act (EPCRA)  
Toxic Release Inventory

**Jeff Beattie**

Division of Air Pollution Control



# Toxic Release Inventory



- TRI
- Section 313
- Emergency Planning and Community Right-to-Know Act (EPCRA)

# Purpose of TRI Reporting

- To provide the public and authorities with information on **releases and other waste management** of the Section 313 toxic chemicals and chemical categories in the communities.
- To provide EPA with such information for yearly trend data and comparison and to assist in determining the need for future regulations.

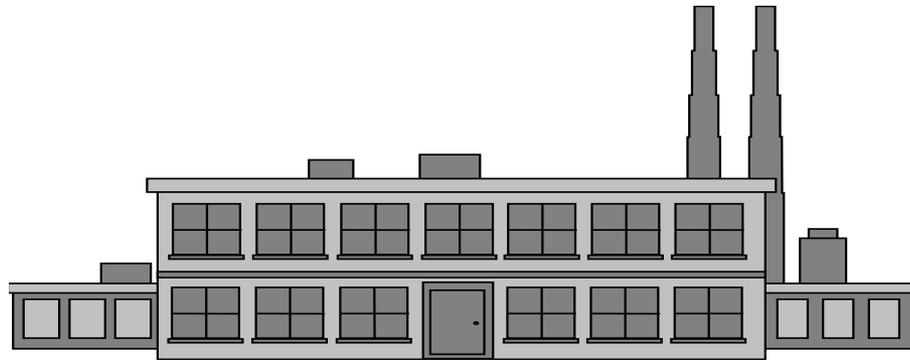
# Limitations of TRI Data

- TRI data reflect releases and other waste management of chemicals, **NOT** exposures of the public to those chemicals.
- The TRI Program does not cover ALL sources of releases and other waste management activities such as automobile emissions, and does not cover ALL toxic chemicals or industry sectors.

# Who Must Report

Facilities must meet 3 criteria to trigger reporting:

1. It must conduct operations in a covered North American Industry Classification Codes (NAICS); and
2. It must have 10 or more employees; and
3. It manufactures, processes or otherwise uses any listed toxic chemical in amounts greater than the “threshold” quantity.



# Covered Standard Industrial Classification (SIC) Codes

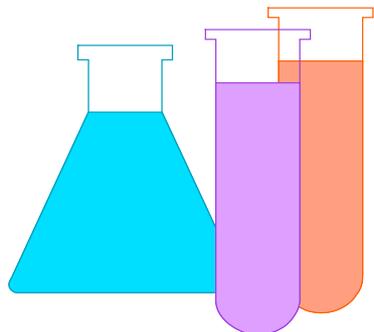
| <b>Industrial Sector</b>                    | <b>Primary SIC Code</b>  |
|---|--|
| Manufacturing                               | 20-39  |
| Metal Mining                                | 10 (except 1011, 1081, and 1094)   |
| Coal Mining                                 | 12 (except 1241)   |
| Electric Utilities                          | 3911, 4931 and 4939, limited to facilities that combust coal and/or oil for the purpose of generating electricity for distribution in commerce |
| Treatment, Storage, and Disposal Facilities | 4953, (limited to facilities regulated under the Resource Conservation and Recovery Act, Subtitle C)   |
| Solvent Recovery Services                   | 7389, limited to facilities primarily engaged in solvent recovery services on a contract   |
| Chemical Distribution                       | 5169   |
| Petroleum Bulk Terminals                    | 5171   |

# North American Industry Classification Codes (NAICS)

- Requires facilities reporting to TRI to use NAICS in place of SIC codes.
- Cross-walk available at:  
[census.gov/eos/www/naics](https://www.census.gov/eos/www/naics)
- Petroleum Refineries (SIC 2911).....NAICS 324110
- Petroleum Bulk Terminals (SIC 5171)....NAICS 424710

# Employee Threshold

- 10 full-time employees (20,000 hours)
  - ✓ Worked at or directly for facility
  - ✓ Includes operational staff, administrative staff, contractors, dedicated sales staff, company drivers, off-site direct corporate support
  - ✓ Does NOT include contract drivers or janitorial contractors
  - ✓ Determinations based on available time management systems/data



## Listed TRI Chemicals

Over 600 toxic chemicals and chemical categories are listed on US EPA's website:

[epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals](http://epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals)

Select Current Year

### TRI List of Reportable Chemicals

- Download a spreadsheet of the current [TRI Chemical List](#) (1 pg, 45 K, 11/5/2015)
- Download a PDF version of the list for Reporting Year

# Section 313 Chemicals With Qualifiers

Qualifiers - Listed chemicals with parenthetical qualifiers subject to TRI reporting only if manufactured, processed, or otherwise used in specified form (40 CFR §372.25(g)). Below are some examples (see Table II of EPA's *TRI Reporting Forms and Instructions* document):

| Chemical                   | CAS #     | Qualifier                                    |
|----------------------------|-----------|--|
| Aluminum                   | 7429-90-5 | Fume or dust                                 |
| Aluminum Oxide             | 1344-28-1 | Fibrous forms                                |
| Asbestos                   | 1332-21-4 | Friable forms                                |
| Isopropyl alcohol          | 67-63-0   | Only manufacturers using strong acid process |
| Phosphorus (not phosphate) | 7723-14-0 | Yellow or white                              |
| Saccharin                  | 81-07-2   | Manufacture only                             |
| Hydrochloric acid          | 7647-01-0 | Acid aerosols                                |
| Sulfuric acid              | 7664-93-9 | Acid aerosols                                |
| Vanadium                   | 7440-62-2 | Except when contained in alloy               |

# Listed PBT TRI Chemicals

- Within the list of 600+ chemicals and chemical categories, there is a subset designated as being of special concern and commonly referred to as PBT\* chemicals (40 CFR § 372.28)
- PBT chemicals have lower activity thresholds and different reporting requirements than non-PBT TRI chemicals
  - ✓ Special rules often apply to PBT chemicals
- 20 chemicals and chemical compound categories are classified as PBTs and have lower activity thresholds

**\*PBT = Persistent, Bioaccumulative, Toxic**

# Persistent, Bioaccumulative, Toxic (PBT) Chemicals

## Aromatics

- Benzo(g,h,i)perylene
- Dioxin and dioxin-like compounds category
- Hexachlorobenzene
- Octachlorostyrene
- Pentachlorobenzene
- Polycyclic aromatic compounds (PAC) category
- Polychlorinated biphenyl (PCB)
- Tetrabromobisphenol A (TBBPA)

## Pesticides

- Aldrin
- Chlordane
- Heptachlor
- Isodrin
- Methoxychlor
- Pendimethalin
- Toxaphene
- Trifluralin

## Metals

- Mercury
- Mercury compounds category
- Lead
- Lead compounds category

# PBT Chemicals and Activity Thresholds

|                                |  |  |
|--------------------------------|--|--|
| <b>PBT Chemical Thresholds</b> | <b>100 lbs./year (manufactured, processed, or otherwise used)</b>  |  |
|                                | <i>Aldrin</i><br><i>Lead*</i><br><i>Lead Compounds</i><br><i>Methoxychlor</i>                                | <i>Pendimethalin</i><br><i>Polycyclic Aromatic Compounds</i><br><i>Tetrabromobisphenol A</i><br><i>Trifluralin</i>                           |
|                                | <i>* Excluding lead in stainless steel brass or bronze alloys</i>  |  |
|                                | <b>10 lbs./year (manufactured, processed, or otherwise used)</b>   |  |
|                                | <i>Chlordane</i><br><i>Heptachlor</i><br><i>Mercury</i><br><i>Toxaphene</i><br><i>Isodrin</i><br><i>PCBs</i> | <i>Benzo(g,h,i)perylene</i><br><i>Hexachlorobenzene</i><br><i>Mercury Compounds</i><br><i>Octachlorostyrene</i><br><i>Pentachlorobenzene</i> |
|                                | <b>0.1 grams/year (manufactured, processed, or otherwise used)</b>   |  |
|                                | <i>Dioxin and dioxin-like compounds</i>  |  |

PBT Chemicals are subject to separate and lower activity thresholds (See 40 CFR § 372.28)

# EPCRA Section 313 Non-PBT Chemical Reporting Threshold Worksheet

Facility Name: OMNI CHEMICAL

Date Worksheet Prepared: \_\_\_\_\_

EPCRA Section 313 Chemical or Chemical Category: Toluene

Prepared By: J.S.P.

CAS Registry Number: \_\_\_\_\_

Reporting Year: \_\_\_\_\_

Amounts of the EPCRA Section 313 chemical or chemical category manufactured, processed, or otherwise used.

### Step 1

| Mixture Name or Other Identifier | Information Source | Total Weight (lb) | Percent EPCRA Section 313 Chemical by Weight | EPCRA Section 313 Chemical Weight (lb) | Amount of the EPCRA Section 313 Chemical or Chemical Category by Activity (lb): |              |                      |
|----------------------------------|--------------------|-------------------|--|--|---|--------------|----------------------|
|                                  |                    |                   |  |  | Manufactured  | Processed    | Otherwise Used       |
| 1. <i>Joe's Degreaser</i>        | <i>Purchasing</i>  | <i>10,000</i>     | <i>50</i>                                    | <i>5,000</i>                           |   |              | <i>5,000</i>         |
| 2. <i>Bathroom Paint</i>         | <i>Vendor</i>      | <i>30,000</i>     | <i>5</i>                                     | <i>1,500</i>                           |   |              | <i>1,500</i>         |
| 3. <i>Parts Washer Fluid</i>     | <i>Purchasing</i>  | <i>10,000</i>     | <i>40</i>                                    | <i>4,000</i>                           |   |              | <i>4,000</i>         |
| 4.                               |                    |                   |  |  |   |              |                      |
| Subtotal:                        |                    |                   |  |  | (A) _____ lb  | (B) _____ lb | (C) <u>10,500</u> lb |

Identify amounts of toxic chemical manufactured, processed, or otherwise used.

Exempt quantity of the EPCRA Section 313 chemical or chemical category that should be excluded.

### Step 2

| Mixture Name as Listed Above | Applicable Exemption (articles, facility, activity) | Fraction or Percent Exempt (if Applicable) | Amount of the EPCRA Section 313 Chemical Exempt from Above (lb): |                            |                            |
|------------------------------|---|--|--|----------------------------|----------------------------|
|                              |   |  | Manufactured   | Processed                  | Otherwise Used             |
| 1. <i>Bathroom Paint</i>     | <i>Structural Component</i>                         | <i>100</i>                                 |  |                            | <i>1,500</i>               |
| 2.                           |   |  |  |                            |                            |
| 3.                           |   |  |  |                            |                            |
| 4.                           |   |  |  |                            |                            |
| Subtotal:                    |   |  | (A <sub>1</sub> ) _____ lb                                       | (B <sub>1</sub> ) _____ lb | (C <sub>1</sub> ) _____ lb |

Identify exempt forms of the toxic chemical that have been included in Step 1.

### Step 3

Calculate the amount subject to threshold.

Amount subject to threshold:

(A-A<sub>1</sub>) \_\_\_\_\_ lb (B-B<sub>1</sub>) \_\_\_\_\_ lb (C-C<sub>1</sub>) 9,000 lb

Compare to threshold for EPCRA Section 313 reporting.

25,000 lb      25,000 lb      10,000 lb

If any threshold is exceeded, reporting is required for all activities. Do not submit this worksheet with Form R or Form A; retain it for your records.



# Section 313 Chemicals (non-PBT) Thresholds

- A facility meeting all applicability criteria must file a Form R report for a non-PBT Section 313 chemical if the facility:
  - ✓ **Manufactured** (including imported) more than **25,000** pounds of the chemical in the reporting year, or
  - ✓ **Processed** more than **25,000** pounds of the chemical in the reporting year, or
  - ✓ **Otherwise Used** more than **10,000** pounds of the chemical in the reporting year

# Alternate Threshold Rule (Non-PBT Chemicals)

- Criteria for submitting a Form A for non-PBT chemicals
  - ✓ Do not exceed 1,000,000 pounds of the toxic chemical manufactured, processed, or otherwise used.
  - ✓ Do not exceed 5,000 pounds for the total waste management (i.e., releases including disposal, recycling, energy recovery, and treatment) of the Section 313 chemical.\*
  - ✓ Do not exceed 2,000 pounds of releases including disposal (i.e., Section 8.1 and any releases in Section 8.8 of the Form R)

# Question 1

A plant uses benzene as a raw material to manufacture liquid industrial adhesive for sale. The plant adds 27,000 lbs. of benzene to its liquid adhesive-making operation during the reporting year, but 3,000 lbs. are volatilized during the operation.

How much of the benzene should be applied toward the processing activity threshold?

- A. 27,000 lbs.
- B. 24,000 lbs.
- C. 3,000 lbs.

## *Answer A is correct.*

- 27,000 total lbs. of benzene is processed.
- Always apply the total amount that enters a process toward the activity threshold.
- The quantity of benzene processed exceeds the 25,000 lbs. processing threshold for non-PBT chemicals, therefore, the facility would need to complete a TRI form for benzene. The quantity released to the environment would be reported on the TRI Form R.

## Question 2

If a facility processes 20,000 lbs. of 2-Butoxyethanol in one operation and 10,000 lbs. of 2-(2-Butoxyethoxy)ethanol in another operation during the reporting year, what should it apply towards it's processing threshold for glycol ethers?

- A. 10,000 lbs.
- B. 20,000 lbs.
- C. 30,000 lbs.

## *Answer C is correct.*

- 2-Butoxyethanol 2-(2-Butoxyethoxy)ethanol are both chemicals within glycol ethers chemical category; therefore, the quantities of each chemical processed during the reporting year should be summed (**30,000 pounds**).
- The facility has exceeded the reporting threshold for processing (25,000 lbs.) and would need to report for the glycol ethers chemical category.

## Question 3

A facility processes 18,000 lbs. copper sulfate, 10,000 lbs. of cuprous oxide, and otherwise uses 12,000 lbs. of aqueous sulfuric acid solution in a closed system.

For which TRI chemicals or chemical categories would the facility need to submit a TRI form?

- A. Copper compounds and sulfuric acid
- B. Only copper compounds
- C. Only sulfuric acid

## ***Answer B is correct.***

- The facility has exceeded the 25,000 lbs. processing threshold for copper compounds ( $18,000 + 10,000 = 28,000$ ) and would need to submit a TRI form for copper compounds.
- The qualifier for sulfuric acid (see Section 313 Chemicals) indicates that it is only reportable in an aerosol form. Because the facility only used the sulfuric acid in an aqueous form (and does not generate acid aerosols), it does not need to consider it towards the otherwise use threshold, and no report for sulfuric acid is required.

## Question 4

A facility uses 50,000 lbs. of nitric acid as a cleaner. The entire amount is neutralized in their on-site wastewater treatment operation and there are no air or water releases.

Do they meet the criteria for submitting a Form A?

- Yes
- No

## ***No is Correct.***

- The total amount of the chemical manufactured, processed, or otherwise used (50,000 lbs.) is below the 1,000,000 lbs. threshold for using Form A.
- However, the annual reportable amount (50,000 lbs.) is greater than the 5000 lbs. threshold for non-PBT chemicals, because all 50,000 lbs. of nitric acid are treated onsite.
- The facility would file a Form R for nitric acid.

## Question 5

A facility processes 200,000 lbs. of a mixture containing 10% zinc chromate ( $\text{ZnCrO}_4$ ) and 15% chromium dioxide ( $\text{CrO}_2$ ) by weight.

For which of the following chemical categories was the processing threshold exceeded?

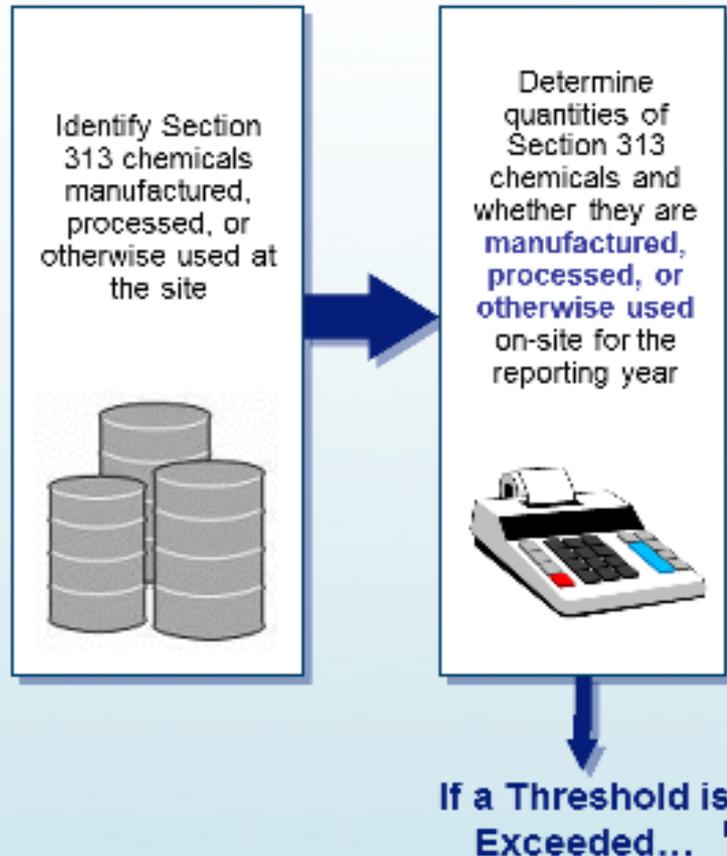
- A. Chromium compounds only
- B. Zinc compounds only
- C. Neither
- D. Both

## *Answer A is Correct.*

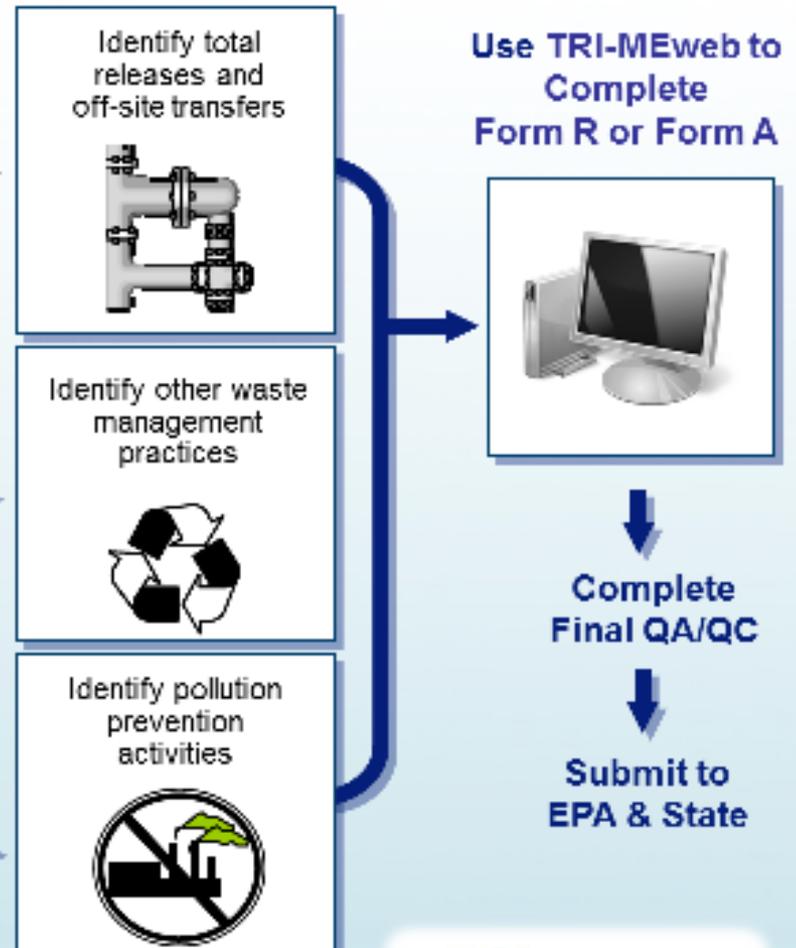
- Total chromium compounds processed:  
 $(10\% + 15\%)*(200,000) = 50,000$  lbs.
- Total zinc compounds processed:  
 $(10%)*(200,000) = 20,000$  lbs.
- The non-PBT chemical processing threshold (25,000 lbs.) was exceeded for chromium compounds, but not zinc compounds.

# TRI Process – 2 Part Process

## Applicability & Threshold Determinations



## Release/Waste Mgmt. Reporting



# Use Exemptions

- Types of exemptions
  - ✓ De minimis
  - ✓ Article
  - ✓ Laboratory activities
  - ✓ Otherwise Use exemptions
    - Motor vehicle maintenance
    - Routine janitorial or facility grounds maintenance
    - Structural components
    - Personal use
    - Intake water and air

# Common Misapplication of Exemptions

- De Minimis Exemption– Applies to the starting material only. Diluting a chemical does not get you out of reporting.
- Article Exemption
  - ✓ An Article must meet three criteria
    1. Formed into a specific shape or design during manufacture; and
    2. Has end-use functions dependent in whole or in part on its shape or design during end-use; and
    3. Does NOT release a Section 313 chemical under normal processing or use at a facility
  - ✓ The manufacturing of an article is not exempt.
  - ✓ If there are any releases of a TRI chemical from the articles (from grinding, etc,) the item is not exempt.

# Reporting Under TRI

- The reporting forms are called Form R and Form A
- Form R consists of a five (5) page report
  - ✓ Part I, Facility Identification Information
  - ✓ Part II, Chemical-Specific Information
  - ✓ A Form R is submitted for each chemical for which the reporting threshold was exceeded.
- Form A
  - ✓ Used by facilities with small quantities of TRI chemicals released or managed as a waste.
  - ✓ Multiple chemicals can be reported on a Form A.

# Reporting Releases

- Release to Air
  - ✓ Identifies fugitive and point-source(stack) emissions to the air
  
- Release to Water
  - ✓ Identifies the release amount and the stream of water body name
  
- Deepwell Injection
  - ✓ Identifies quantity injected by the facility and whether the well is Class I or Class II-V
  
- Release to Land On-site
  - ✓ Identifies whether the released amount was to RCRA Subtitle C landfill, other landfill, land treatment, RCRA Subtitle C surface impoundment, other surface impoundment or other disposal

# Reporting Releases

- Discharges to POTW
  - ✓ Identifies the amount released to POTWs and their names and addresses
- Off-Site Disposal/Treatment
  - ✓ Quantity and off-site location information (address, RCRA ID etc.) of chemicals shipped off-site for disposal/treatment
- Energy Recovery On/Off-Site
  - ✓ Identifies quantities of the listed chemical that have been used for energy recovery and whether the use was on-site or off-site
- Recycled On/Off-Site
  - ✓ Identifies quantities of the listed chemical that have been recycled and whether the recycling occurred on-site or off-site
- Treatment On-Site
  - ✓ Identifies quantities of the listed chemical that have been treated and whether the treatment took place on-site or off-site

# Submitting TRI Reports

- Reports are due July 1
  - ✓ The report summarizes the releases which occurred in the previous calendar year.
- TRI reports are be submitted to U.S. EPA via CDX.
- Ohio EPA collects an annual filing fee
  - ✓ Base \$50.00 (not required if only filing Form “A”)
  - ✓ Additional \$15.00 for each Form “R” submitted
  - ✓ Fee Cap \$500.00 Late Fee Penalty 15% after August 1st

# TRI-MEweb

TRI-MEweb has many new features:

- Requires no software download. It can be accessed anywhere there is internet connection
- Has quicklists that allow users to customize the questionnaire to areas of the TRI forms that are applicable
- Automatically populates current year forms based on last year's data for you to begin your report
- Maintains prior year data and will store in-progress data
- Has an automated Section 8 column b calculator
- Has enhanced data quality and error validation checks for a clean and error free submission
- Offers new reports such as the Trend Analysis Report that allows you to compare prior year submissions to the current year

# Submitting TRI Reports

- Facilities report using “TRI-MEweb”, a web-based application that requires no downloads or software installations.
- Software leads user through series of logical questions and streamlines the analysis needed to determine if a user must complete a Form “R” or Form “A” for a particular chemical
- Built in edit checks eliminate many errors.
- Reports prepared electronically can be filed simultaneously to USEPA and Ohio EPA through the Federal Central Data Exchange (CDX).
- This eliminates diskette submittal to Ohio.

# TRI Training Modules

[epa.gov/toxics-release-inventory-tri-program/training-tri-reporting-ry-2015](http://epa.gov/toxics-release-inventory-tri-program/training-tri-reporting-ry-2015)

## Training on TRI Reporting for RY 2015

For people involved with Toxics Release Inventory (TRI) reporting under Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA).

### On this page:

- [Training on Basic TRI Reporting Concepts](#)
- [Training on Advanced TRI Reporting Concepts](#)
- [Showcasing Sustainability in Your TRI Report](#)



[epa.gov/toxics-release-inventory-tri-program/tri-meweb-tutorials](http://epa.gov/toxics-release-inventory-tri-program/tri-meweb-tutorials)

# Basic Concepts Course

This course will help you determine:

- If your facility is covered by EPCRA Section 313 (the Toxic Release Inventory); and
- If your facility is covered, for which chemicals your facility must submit a TRI report.

# Basic Concepts Course continued

You will also learn about:

- Information on making the release and other waste management calculations and estimates;
- When the Form A Certification statement can be used instead of the Form R;
- Reporting exemptions (i.e., particular uses of TRI chemicals that don't have to be included in TRI reports); and
- General TRI program and process information.

# Advanced Concepts Course

If your facility must report to TRI, this course will help you understand:

- Advanced issues related to threshold determinations, TRI reporting, and exemptions;
- Information on reporting requirements for PBTs (such as lead, mercury, PACs, etc.) and other chemicals (such as hydrochloric acid aerosols, ammonia, metal compounds, nitrate compounds, and metal cyanides) with special TRI reporting considerations;
- General TRI program and process information; and
- How to use the TRI-MEweb online reporting application, and the CDX electronic submission process

# USEPA Database Toxic Release Inventory

U.S. EPA compiles all the reports into a database that can be accessed over the internet.

- TRI Explorer
- TRI Envirofacts
- TRI.Net

[epa.gov/toxics-release-inventory-tri-program/tri-data-and-tools](http://epa.gov/toxics-release-inventory-tri-program/tri-data-and-tools)

# USEPA 2014 TRI Data

- 21,783 Industry and Federal Facilities Reported.
- 650 Plus Chemicals and Chemical Categories.
- TRI facilities reported disposing of or releasing 3.89 Billion Pounds of TRI chemicals with:
  - ✓ 19% to air on-site
  - ✓ 6% to water on-site
  - ✓ 64% to land on-site
  - ✓ 11% as off-site disposal

# 2014 Ohio TRI Data

- 1,357 TRI Reporting facilities
- 297 TRI Chemicals Reported
- 4,637 Form Rs Submitted (752 for PBTs)
- 571 Form As Submitted
- 1/3 facilities reported 1 chemical
- Avg. # chemical reported: 4

# Ohio's National Rank

Based on the Calendar Year 2014 TRI Data

- Air Releases: #3 (44,944,789 pounds)
- Water Releases: #11 (6,928,893 pounds)
- Land On-Site Releases: #13 (26,636,090 pounds)
- Deep Well Injection: #4 (16,188,049 pounds)
- Approximately 153 million pounds of TRI toxic chemicals were reported as released to the environment or transferred off-site for treatment or disposal in Ohio.

# 2014 Ohio TRI Data

## Top Ten Ohio Counties for Total Releases and Transfers

- Hamilton 14,434,344 pounds
- Cuyahoga 14,323,275 pounds
- Allen 11,928,035 pounds
- Sandusky 9,628,035 pounds
- Ashtabula 9,094,918 pounds
- Coshocton 8,142,189 pounds
- Washington 7,139,007 pounds
- Lorain 6,708,333 pounds
- Jefferson 6,453,126 pounds
- Gallia 5,452,697 pounds

# 2014 Ohio TRI Data

## Top 10 Chemicals

|                                     |                   |
|-------------------------------------|-------------------|
| ▪ Nitrate Compounds                 | 23,186,190 pounds |
| ▪ Zinc and Zinc Compounds           | 16,665,569 pounds |
| ▪ Sulfuric Acid (Aerosols)          | 12,328,831 pounds |
| ▪ Manganese and Manganese Compounds | 10,981,252 pounds |
| ▪ Hydrochloric Acid (Aerosols )     | 10,434,536 pounds |
| ▪ Ammonia                           | 8,581,230 pounds  |
| ▪ Nitric Acid                       | 6,336,066 pounds  |
| ▪ Methanol                          | 5,493,399 pounds  |
| ▪ Barium and Barium Compounds       | 5,184,729 pounds  |
| ▪ Toluene                           | 4,735,982 pounds  |

# 2014 Ohio TRI Data

## Top Ten Facilities Total Releases and Transfers

- Vickery Environmental Inc. (Sandusky)
- INEOS USA, LLC (Allen)
- Shepard Chemical Company (Hamilton)
- Tier Environmental LLC (Cuyahoga)
- AK Steel Corporation (Coshocton)
- Cristal USA, Inc. (Ashtabula)
- Arcelormittal Cleveland LLC (Cuyahoga)
- W.H. Sammis Plant (Jefferson)
- American Electric Power Gavin Plant (Gallia)
- PCS Nitrogen Ohio L.P. (Allen)

# Ohio's Annual TRI Report

- Ohio EPA's annual TRI report includes:
  - ✓ The top releasing facilities;
  - ✓ The quantity of chemicals released to each media (e.g., air, land, water); and
  - ✓ County summaries
- Copies of the reports are available at [epa.ohio.gov/dapc/tri/tri.aspx](http://epa.ohio.gov/dapc/tri/tri.aspx)
- Facilities named in the report as a “top facility” receive an advanced copy of the report.

# Technical Assistance

- Regulatory Assistance  
800-424-9346 (option 3)
- CDX  
888-890-1995
- TRI Reporting Assistance  
703-227-7644  
[www.epa.gov/tri/](http://www.epa.gov/tri/)
- Ohio EPA TRI Unit  
Muhammad Elsalahat  
614-644-3608  
[muhammad.elsalahat@epa.ohio.gov](mailto:muhammad.elsalahat@epa.ohio.gov)

# Questions?

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