



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

To: Ohio Toxic Release Inventory (TRI) Reporting Facilities
From: Ohio EPA TRI Program (Muhammad Elsalahat)
Date: February 24, 2015
Re: **TRI Filing for Reporting Year 2014 (RY 2014) due July 1, 2015**

The Ohio EPA-TRI program would like to remind you that the deadline to submit TRI forms for RY 2014 is midnight on July 1, 2015.

Ohio EPA participates in the TRI State Data Exchange (CDX) System through which U.S. EPA automatically forwards your TRIMEweb submission directly to our Ohio database. Once you certify your electronic TRI submission to U.S. EPA, your facility has successfully satisfied your reporting obligation to both U.S. EPA and Ohio EPA.

In Ohio, reporting facilities are still obligated by Ohio Administrative Code 3745-100-12, to submit a TRI filing fee to Ohio EPA. The filing fee is not dependent upon the manner in which the reports are submitted (e.g., through the federal CDX system or in hard copy format). The fees are used to implement and administer the Ohio TRI Program. The fee worksheet can be downloaded at: <http://epa.ohio.gov/portals/27/tri/tri/trifec.pdf>

Ohio EPA has created a voluntary “negative” report that can be used by facilities that filed a TRI report for the previous reporting year, but are no longer required to complete a TRI report. If you reported last year for reporting year 2013, but find your facility not having to report for 2014, we request that you complete the “negative form” so that we will know why you have not filed a TRI report. The submission of a negative report is not required by Ohio law, and no filing fee is required with a negative report. The negative report, and other TRI related material can be found at: <http://epa.ohio.gov/dapc/tri/tri.aspx>

The following are Important Information for Reporting Year (RY) 2014

Electronic Reporting of Toxics Release Inventory Data:

U.S. EPA finalized the Electronic Reporting of Toxics Release Inventory Data rule, which requires facilities to submit non-trade secret TRI reporting forms electronically to U.S. EPA. The rule was published in the Federal Register on August 27, 2013 (78 FR 52860) and became effective on January 21, 2014. Reports due July 1, 2015 for RY 2014 must be submitted to U.S. EPA electronically using TRI-MEweb. Reports that are not submitted electronically using TRIMEweb will not be processed as acceptable submissions. However, facilities submitting TRI reports containing trade secrets will still submit their reports to U.S. EPA on paper, not via TRIMEweb. This electronic reporting requirement includes late submissions for prior reporting years, revisions, and withdrawals.

New TRI Chemicals:

Nonylphenol Category: A rule was published on September 30, 2014, (79 FR 58686) adding a nonylphenol category to the TRI list of reportable chemicals. Facilities that manufacture, process, or otherwise use nonylphenol should begin collecting release information on the chemical during 2015. Reporting forms will be due July 1, 2016 for nonylphenol if TRI chemical use and other thresholds are met.

O-Nitrotoluene: A final rule was published on November 7, 2013 (78 FR 66848) to add o-nitrotoluene to the list of chemicals required for TRI reporting. Facilities are required to submit TRI forms for RY 2014 activities, due July 1, 2015, if TRI chemical use and other thresholds are met.

Facilities May Now Submit Optional Facility-Level Information in TRI-MEweb Without Submitting a Form R or Form A:

You can now use TRI-MEweb to update location and contact information for your facility without having to submit a TRI reporting form. Additionally, without submitting a TRI reporting form, you can now use TRI-MEweb to indicate that your facility will no longer be reporting to TRI or will not be submitting a form for one or more specific TRI listed chemicals for the current reporting year.

Optional Field for Reach Code of Receiving Streams or Water Bodies:

In Section 5.3, you are required to enter the names of the streams or water bodies to which your facility directly discharges a reportable EPCRA Section 313 chemical. Beginning in Reporting Year (RY) 2014, you may enter the 14-digit reach code assigned to each receiving water body by the United States Geological Survey's (USGS) National Hydrography Dataset (NHD). Doing so will ensure that EPA and other researchers map your discharges to the correct stream reach when conducting analyses. TRI-MEweb will automatically populate the appropriate reach code when you select your receiving water body on the map provided in the user interface for this section.

Reporting Production or Activity Ratio:

Beginning in RY 2014, you are required to indicate whether the ratio you are reporting in Section 8.9 is a production ratio or an activity ratio. EPA has also clarified the instructions for this Section and added new examples to help you select the appropriate variable to use in calculating this ratio.

Estimated Annual Reduction for Source Reduction Activities:

Beginning in RY 2014, you may provide an optional percentage range indicating the estimated annual reduction in chemical waste generation associated with any source reduction activity(s) you have reported in Section 8.10. If you choose to complete this field, the reductions associated with your pollution prevention efforts will be featured on EPA's website through the TRI Pollution Prevention Search Tool at: www.epa.gov/tri/p2.

Optional Checkboxes in Section 8.11 for Barriers to Source Reduction:

Beginning in RY 2014, TRI-MEweb will provide a pick-list of categories that you may use to report barriers your facility faces with respect to source reduction. You may also elaborate on how these barriers apply to your facility by clicking the "Provide additional info" button next to any checkbox you have selected. This information is optional and will appear in Section 8.11.

Checkboxes for Categorizing Optional Free-Text Information in Sections 8.11 and 9.1:

Beginning in RY 2014, you may indicate that you are submitting information pertaining to one or more

specific topics by selecting from a pick-list of topics provided by TRI-MEweb in Section 8.11 and Section 9.1. Sections 8.11 and 9.1 will be displayed as a table of comments on different topics rather than as single textboxes. Use of the checkboxes will ensure that your optional information reaches its intended audience.

Labeling Changes:

The Form R for RY 2014 includes several labeling changes that are not associated with any changes to reporting requirements. These changes include the relabeling of Section 8, “Source Reduction and Waste Management;” the insertion of the heading, “Production-related waste managed” for Sections 8.1-8.7; the relabeling of Section 8.8 as “Non-production related waste managed”; the placement of the heading “Disposal to land on-site” to encompass both Sections 5.4 and 5.5; and the use of the term “Activity Ratio” in Section 8.9 in place of “Activity Index.”

Pollution Prevention:

In order to promote pollution prevention (P2), EPA has increased the prominence and accessibility of the P2 information reported in Sections 8.10 and 8.11 of the Form R. Some companies reporting P2 are now highlighted in the annual TRI National Analysis report, and all P2 entries are featured in the TRI P2 Search tool. P2 data is also newly accessible at the corporate level through this tool. To learn more, visit: <http://www2.epa.gov/toxics-release-inventory-tri-program/pollution-prevention-p2-and-tri>

Distributing POTW Transfer Quantities in Section 8:

Table VI contains removal and destruction rates for toxic chemicals sent to POTWs, based on experimental and estimated data. These percentages are automatically pre-loaded into TRI-MEweb to assist with Section 8 calculations, but may be overridden if the facility has better information on the final disposition of the chemical readily available.

Contacts:

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Federal:

CDX Help Desk- 1-888-890-1995

CDX e-mail address- helpdesk@epacdx.net

CDX web address- www.epa.gov/cdx/

U.S. EPA TRI web address: www.epa.gov/tri/

TRI-MEweb site address: www.epa.gov/tri/report/software/trimeweb/index.htm

U.S. EPA TRI Information Center- 1-800-424-9346 (Select option 3)