

CRAFTSMAN'S CRIBSHEET

NUMBER
19

Miles Free – Director of Technology and Research



Technical



Regulatory



Quality



Management

TOXIC RELEASE INVENTORY REPORTING: WHAT YOU NEED TO CONSIDER

SARA Title III Section 313 (part of the community right-to-know regulations) is the legal authority requiring manufacturers to inventory their use of "Toxic Chemicals" during the calendar year and report on "releases" of those chemicals if the reporting thresholds for that chemical are exceeded.

Do you need to report Toxic Release Inventory (TRI)?

1. During the previous calendar year, did your shop have 10 or more full time employees or the equivalent of 20,000 employee hours?
2. Do your operations have a NAICS code associated with manufacturing 31-33 (old SIC codes 20-39)?

If the answer to both questions is YES, you may be subject to TRI reporting.

Next, do you have chemicals subject to TRI Reporting? While there are over 600 chemicals on the TRI list, here are some typically found in raw materials in our precision machining shops: arsenic, beryllium, chromium, cobalt copper, nickel, manganese, lead and cobalt. Aluminum is also to be considered, but only as a fume or dust. While we have mentioned only metals, organic chemicals may be found in our shops that also require reporting, such as the degreaser trichloroethylene.

If your raw materials contain one or more TRI chemicals, you must now determine if you manufacture, process or otherwise use any of the TRI chemicals above threshold quantities.

If you machine materials that contain any of the metals or chemicals mentioned above, you are "processing" the TRI chemical. Precision machining operations are included under processing. The "trichloroethylene" would probably be classified as "otherwise use," as would the use of tool steel in machining.

Calculate threshold quantities for chemicals you process or otherwise use. For chemicals that you "process," the threshold for non-PBT chemicals is

Section 313 Toxic Release Inventory Reporting Checklist

- Over 10 Employees
- NAICS Code is Manufacturing
- Chemicals Subject to Reporting
- Process or Otherwise Use
- Exceed Threshold Quantities
- Calculate Totals Processed for Each Chemical
- Estimate Releases
- Report

25,000 pounds per year. For "otherwise use," it is 10,000 pounds per year. PBT chemicals (Persistent Biological Toxicity) in our shops include lead when it is NOT contained in brass, bronze or stainless steel. The PBT lead threshold is 100 pounds. You would calculate the thresholds for PBT and non-PBT lead separately, if you don't exceed the threshold for either, do not report lead.

If the total amount of any chemical over the calendar year exceeded one of the above applicable thresholds, you need to fill out a TRI report. For a quick estimate: one truckload of 40,000 pounds of leaded steel will put you at the 100 pound threshold for lead. Four truckloads of 303 stainless, 160,000 pounds, will put you at 28,800 pounds of chromium, 3,800 pounds above reporting threshold. 42,000 pounds of 360 brass will exceed the threshold for copper and trigger need for reporting.

More detailed information on TRI, including a member-only calculator, can be found on the PMPA website: [pmpa.org/knowledge-tools/environmental-resources/2012/05/29/2012-toxic-release-inventory-\(tri\)-reference-documents](http://pmpa.org/knowledge-tools/environmental-resources/2012/05/29/2012-toxic-release-inventory-(tri)-reference-documents)