



TOXICS RELEASE INVENTORY (TRI) REPORTING OF NITRATES FOR METAL FINISHERS THE QUICK AND DIRTY GUIDE



You **must** report releases of toxic chemicals (nitrates) if:

- ✓ Your facility's SIC Code is between 2000-3900 (other SIC Codes also listed)
- ✓ You have 10 or more full-time employees
- ✓ You manufacture ("coincidental manufacture"), import, process or otherwise use any of the toxic chemicals listed on the EPCRA section 313 list (nitric acid, dissociable nitrate compounds) in amounts greater than **25,000 pounds** per calendar year (threshold limit)

- To determine if you are over the 25,000 lb. threshold limit, use the entire weight of the nitrate compound (not just the ion) in calculations.
- To determine the amount you "coincidentally manufacture," or release quantities for reporting, use only the nitrate ion portion of the compound in calculations.

Complete calculation and reporting guidelines can be found in EPA 745-R-99-008, Toxics Release Inventory List of Toxic Chemicals within the Water Dissociable Nitrate Compounds Category and Guidance for Reporting, available at:
<http://www.epa.gov/tri/nitrates.pdf>.

Special Note for Small Businesses (less than 100 employees):

A pardon mechanism exists for lack of past reporting: the **Small Business Compliance Policy**. This allows a small business to state that they were not aware of the requirement and will now comply. EPA will eliminate or reduce civil penalties if the business:

- Discovers the violation voluntarily
- Discloses the violation fully and in writing to the EPA or state within 21 calendar days after the business discovers the violation and before discovered by a regulatory agency
- Corrects the violation within the shortest practicable period of time

Does NOT apply to "bad actors"!

EPA Small Business Compliance Policy available at: www.epa.gov/oeca/smbusi.html.



If you have questions:

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

Phone Numbers:

U.S. EPA EPCRA Hotline	(800) 424-9346
U.S. EPA Region 4 EPCRA Section, EPCRA Coordinator for North Carolina	Bill Henderson, (404) 562-9178
EPCRA Section 313/Toxic Chemical Release Inventory (TRI) contact: (Also the contact for the TRI Workshop in Charlotte on April 30 – May 1, 2001)	Ezequiel Velez, (404) 562-9191
EPA Region IV TRI contact:	Stacy Bouma, (404) 562-9192
N.C. Division of Emergency Management	(919) 733-1361 or (800) 451-1403

EPCRA Internet Addresses:

U.S. EPA TRI Web site: <http://www.epa.gov/tri/>

U.S. EPA Chemical Emergency Preparedness and
Prevention Office: <http://www.epa.gov/ceppo/>

U.S. EPA "Audit Policy": <http://es.epa.gov/oeca/finalpolstate.pdf>



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