

## TRI Lead Reporting Threshold Worksheet

Did you have 10 or more employees or equivalent (20,000 man-hours) last year? If no, you do not need to submit a Form R. If yes, use this worksheet to determine if you need to submit a TRI report (Form R) for lead (Pb) or lead compounds. Retain this worksheet and all support data and calculations for your records, even if you do not need to submit a TRI lead report.

- Do you perform any of the following processes and release 0.5 lbs of lead to the environment (wastewater, sludge disposal/recycle, spent solutions)? If yes, you must submit a TRI report for lead.
  - Chromium plating (except Cr+3)
  - Sulfuric acid anodizing using lead cathodes
  - Any electrolytic process, including cleaning, that use lead electrodes
  - Lead and tin/lead plating
- Do you operate any of the following processes near or above the specified levels? If yes, there is a good chance you need to submit a TRI Pb report. Also, consider lower production levels if you operate more than one of these processes. Use the table below to determine if you need to report.
  - Zinc plating with anode use greater than 700,000 pounds per year
  - Tin plating with anode use greater than 50,000 pounds per year
  - Brass plating with anode use greater than 70,000 pounds per year.
  - Nickel plating with anode use greater than 380,000 pounds per year
  - Copper plating with anode use greater than 640,000 pounds per year
  - Processing large volumes of leaded base metals
  - Wastewater treatment (it only takes 1 mg/l Pb in your raw wastewater to exceed the Pb threshold, if you have a flow of 10.3 million gallons per year or more.
- Review your operation for other potential sources of lead such as burnishing of zinc die castings and polishing operations. Use the table below to determine if you need to submit a TRI lead report.

TRI Chemical Name	Source of TRI Chemical, (e.g., anodes, wastewater, sludge)	Quantity of TRI Chemical			Data Source (e.g., purchase records, analytical data)
		Manufactured*	Processed*	Otherwise Used*	
Lead					
Lead					
Lead Compound					
Lead Compound					
Lead Compound					
<b>Subtotals</b>		<b>lbs.</b>	<b>lbs.</b>	<b>lbs.</b>	
<b>Threshold</b>		<b>100 lbs.</b>	<b>100 lbs.</b>	<b>100 lbs.</b>	

\*If any of the three subtotals exceeds the 100 lbs. threshold, reporting is required for all activities at your facility involving lead. For definitions of “manufactured,” “processed,” and “otherwise used,” see <http://www.nmfr.org/tri.cfm>.

You are not required by law to do any additional analytical work to make TRI determinations. However, you must use whatever data you are required by law to collect/retain such as wastewater monitoring data and RCRA manifests. You must also use other data and information that are available to you such as sludge analyses and anode assays. When calculating the quantity of lead compounds, be certain to calculate the full weight of the compound, not just the weight of the lead. For example, if you have lead in your wastewater, for each pound of lead you will “manufacture” 1.16 pounds of lead compounds. Go to [www.nmfr.org/tri.cfm](http://www.nmfr.org/tri.cfm) for additional information.