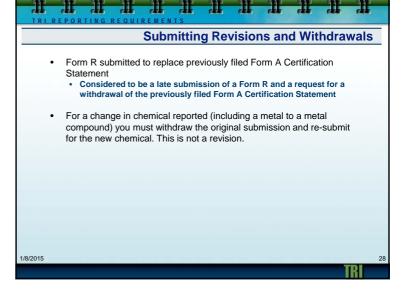
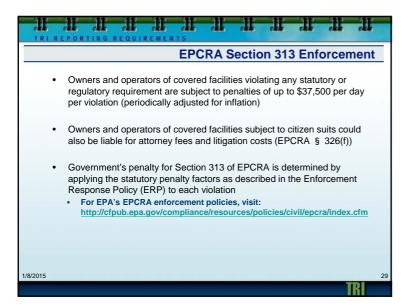


EPA Small Business Compliance Policy EPA Compliance Incentive Policy available only to small businesses Small businesses employ 100 or fewer individuals across all facilities and operations Small businesses that meet all 4 conditions of the policy may have 100% of the gravity based penalty waived. However, EPA reserves the option to collect any significant economic benefit which may have been realized by the facility. Conditions to qualify (four criteria): Good Compliance Record Voluntary Discovery Prompt Disclosure Correction and Remediation For more information, including a copy of the Small Business Compliance Policy and a Q&A document, visit: www.epa.gov/compliance/incentives/smallbusiness/index.html 1/8/2015

Withdrawing TRI Data You must use TRI-MEweb to withdraw a TRI form (except for trade secrets). You may withdraw forms back to RY 1991. For more information regarding withdrawals, go to: http://www.epa.gov/tri/reporting_materials/forms/reviseandwithdrawal/withdraw_TRI_data.pdf Please be aware if your state or tribe is a TRI Data Exchange (TDX) participant, submitting to EPA via CDX will also satisfy your state obligations for reporting years back to 2005. For states or tribes that are not TDX participants, withdrawals should also be submitted in the specified format for the state/tribe EPA may audit withdrawals at any time.

Prince Porting Requirements Revising TRI Data Revising TRI Data Revised TRI data that are not trade-secret must be submitted using TRI-MEweb through the Internet via EPA's CDX. You may only revise back to RY 1991. For more information regarding revisions, go to: www2.epa.gov/toxics-release-inventory-tri-program/how-revise-tri-data If your state or tribe participates in the TRI Data Exchange (TDX) then submitting via CDX to EPA will also satisfy your obligation to report to the state or tribe in which your facility is located if the revision is for RY 2005 through the present reporting year. Otherwise, revisions must also be submitted in the state- or tribe-specified format. To determine if your state or tribe is CDX- capable go to: http://www2.epa.gov/toxics-release-inventory-tri-program/tri-data-exchange

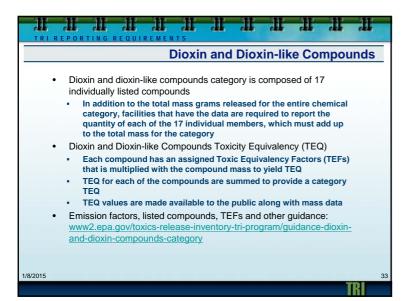




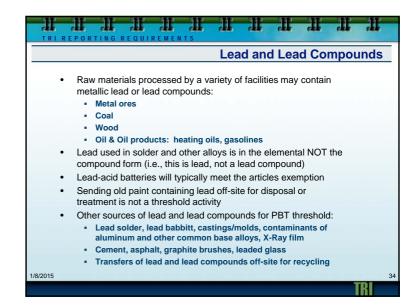


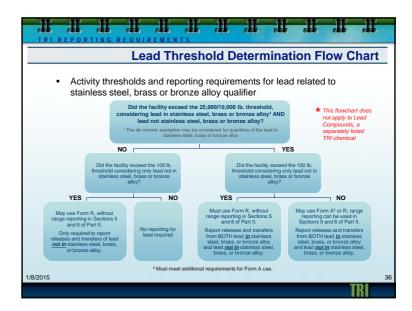
PBT Chemicals • Aromatics - Benzo(g,h,i)perylene, Dioxin and dioxin-like compounds category, Hexachlorobenzene, Octachlorostyrene, Pentachlorobenzene, Polycyclic aromatic compounds (PAC) category, Polychlorinated biphenyl (PCB), and Tetrabromobisphenol A (TBBPA) Metals - Mercury, Mercury compounds category, Lead, and Lead compounds category Pesticides - Aldrin, Chlordane, Heptachlor, Isodrin, Methoxychlor, Pendimethalin, Toxaphene, Trifluralin · PBT chemicals are subject to separate and lower reporting thresholds and different reporting requirements than the other TRI chemicals Must use Form R (cannot use Form A) Quantities can be reported in decimal amounts Cannot use range codes Cannot use the de minimis exemption 1/8/2015

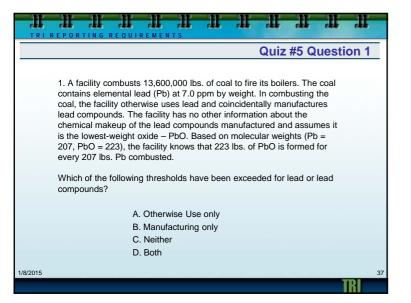
Dioxin and Dioxin-like Compounds Dioxin and Dioxin-like Compounds Dioxin and dioxin-like compounds are reported in grams The manufacture, process, or otherwise used activity thresholds are 0.1 gram Dioxins formed as unwanted byproducts when chlorinated materials involved in combustion or other high-temperature processes, such as: Fossil fuel and wood combustion Waste incineration Metallurgical processes What it takes to exceed the 0.1 gram activity threshold? 64,500 tons of coal combusted in a utility boiler 8.33 million gallons of fuel oil combusted in a utility boiler 1,230 tons of copper scrap fed to a secondary copper smelter

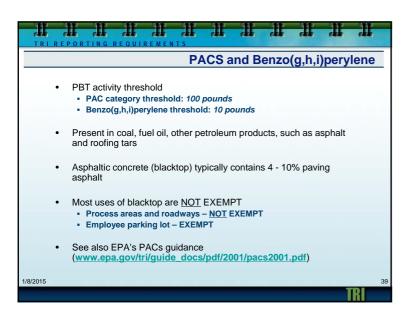




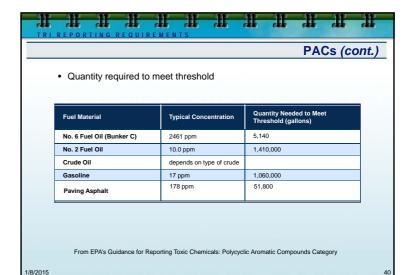


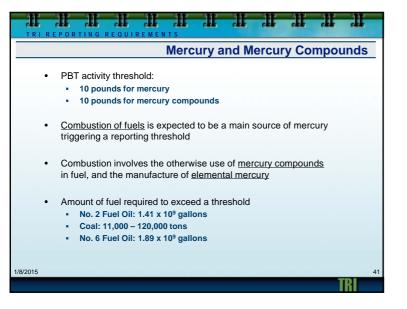


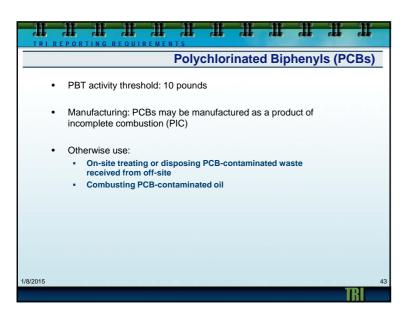




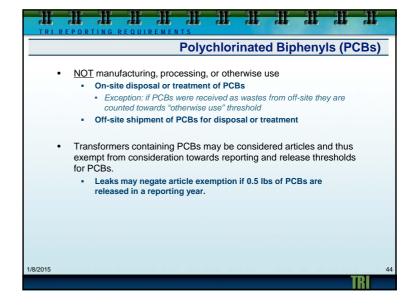
The facility in the previous question combusted 13,600,000 pounds of coal in the reporting year and has exceeded the reporting threshold for lead compounds. The facility has no monitoring data on their point source lead emissions from combusting the coal. They determined that their best available information for calculating their point source air emissions is the published emission factor for lead from controlled coal combustion from EPA's AP-42* which is 4.2E-04 lb Pb/ton of coal combusted. What are the facility's point source emissions of lead from coal combustion? A. 2.86 lb B. Range Code 'A' C. 95.2 lb D. Either 2.86 lb or Range Code 'A'



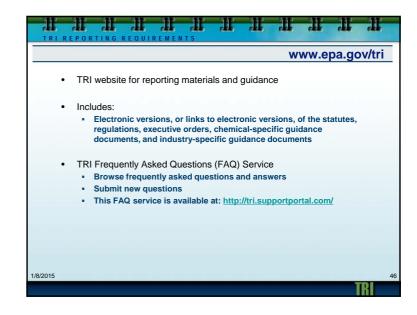


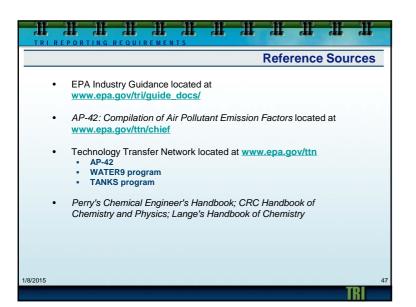


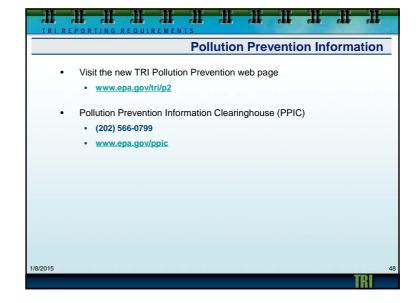
Mercury and Mercury Compounds Present in some switches and lights Bulbs and switches may qualify as articles for which the articles exemption would apply IF less than 0.5 pound of Section 313 chemicals are released from all like items as a result of processing or use of the items during the year Mercury may be present in measurement devices such as thermometers or manometers. The addition of mercury to these devices needs to be considered in threshold and release calculations. Present in Caustics/Acids (if produced in mercury cell process – not common) May be present in mined ores

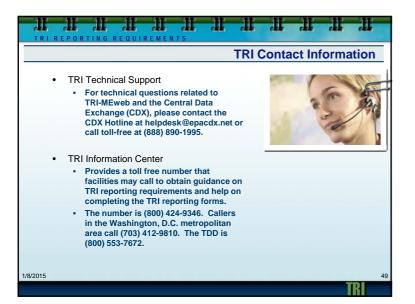


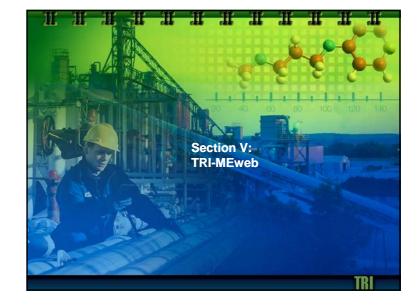












TRI-MEweb is accessed through EPA's Central Data Exchange (CDX)

Certifying officials must submit an electronic signature agreement (ESA)

Option 1: Real-time ESA approval – verify user's identity electronically Option 2: Mail in signature form – minimum of 5 business days to process

For help accessing CDX accounts, password resets, accessing a facility, or

Select TRI-MEweb user role: preparer or certifying official

· Within TRI-MEweb, new users must gain access to their facility

Option 3: Enter TRIFID and Technical Contact Name

CDX is accessed through: https://cdx.epa.gov

TRI-MEweb users must have a CDX account

Option 1: New facility, never reported to TRI

Option 2: Enter six-digit facility access code

Must be completed only once, not annually

completing an ESA, contact the CDX helpdesk:

https://cdx.epa.gov/Contact

1/8/2015

Accessing TRI-MEweb

TRI-MEweb and Submitting Via CDX · Electronic filing via TRI-MEweb is required Beginning on January 21, 2014, no paper submissions will be accepted (except for trade secrets), including revisions and withdrawals . TRI-MEweb supports new reporting, revisions & withdrawals for RY 1991 - 2013• TRI-MEweb pre-populates reporting forms with data submitted for the prior reporting year and assists users in finding reporting errors EPA provides instant email confirmation of transmitted and certified submissions TRI-MEweb resources including tutorials are available to help users at: www2.epa.gov/toxics-release-inventory-tri-program/tri-meweb-· Use hard-copy form only for trade secret reporting Information about trade secret reporting at: www2.epa.gov/toxicsrelease-inventory-tri-program/tri-reporting-forms-and-instructions 1/8/2015



TRI REPORTING REQUIREMEN **TRI-MEweb Tutorials** TRI-MEweb has integrated on-line tutorials to assist users with common functions in the application. · Tutorials cover areas such as Overview Registration · Accessing Your Facility · Nominating a Certifying Official Section 8 Calculator Submitting Data · Certifying Data Getting Help The tutorials can be viewed at: http://www.epa.gov/toxics-release-inventory-tri-program/trimeweb-tutorials 1/8/2015

State Submission Requirements • For most facilities, reporting via TRI-MEweb automatically satisfies EPA and state or tribal reporting requirements via data sharing through the TRI Data Exchange (TDX) • For facilities in states or tribal lands not participating in TDX, TRI-MEweb will help prepare separate submissions to satisfy state or tribal reporting requirements • As of October, 2013, all States except Connecticut, New Hampshire, and Wyoming are in TDX • For an up-to-date list of TDX participant States, visit: www2.epa.gov/toxics-release-inventory-tri-program/tri-data-exchange • TDX does not support reporting from RY 1991 - 2004

