

**PROJECT NAME:           Form R Support**

**PROJECT DESCRIPTION:**

Submission of EPA Form R, the Toxic Chemical release Inventory (TRI) Reporting Form, is required by section 313 of the emergency Planning and Community Right-to-Know Act (EPCRA), or Title III of the Superfund Amendments and Reauthorization Act of 1986), Public Law 99-499. The information contained in Form R constitutes a "report," and the submission of a report to the appropriate authorities constitutes "reporting." A completed Form R must be submitted for each toxic chemical manufactured, processed, or otherwise used at each covered facility as described in the reporting rule in 40 CFR Part 372 (originally published February 16, 1988, in the Federal Register).

Section 313 of EPCRA requires that reports be filed by owners and operators of facilities that meet all of the following criteria.

- The facility has 10 or more full-time employees
- The facility is included in Standard Industrial Classification (SIC) Codes 20 through 39
- The facility manufactures (defined to include importing), processes, or otherwise uses any listed toxic chemical in quantities greater than the established threshold in the course of a calendar year.

The client requested EIS to complete their Form R report. The client otherwise used chemicals in sufficient quantities to require reporting. These chemicals were MDI and methylene chloride.

Documentation of the Logic for Reports:

It was determined by inspection of the summary spreadsheet produced by EIS that the two above chemicals exceeded the threshold for reporting (10,000 pounds). The MDI quantity released for 1994 was determined by multiplying the total amount used by 0.05 percent, the experimentally confirmed release factor. For the years 1995 and 1996 the amount of MDI used was assumed to increase by 5% per year. The methylene chloride quantity released for 1994 was determined by subtracting the amount of methylene chloride in the waste shipped in 1994 from the amount used in 1994. The amount of methylene chloride calculated to be contained in the waste sent off-site was 10 percent as determined from the profile and analytical tests.