Toxic Release Inventory
FORM A AND FORM R REPORTS DUE JULY 1ST

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The Toxics Release Inventory (TRI) was created by EPA in response to several events that raised public concern about local preparedness for chemical emergencies and the availability of information on hazardous substances.

Printing is one of the industry sectors required to annually report releases of certain chemicals. A printing facility with 10 or more full-time equivalent employees is required to report if the facility exceeds established chemical thresholds. *Note that TRI reporting is <u>not</u> based on the amount of emissions to atmosphere or how much waste is generated.* Instead, a company that <u>manufactures or processes</u> more than 25,000 pounds or <u>otherwise uses</u> more than 10,000 pounds of a TRI-listed chemical is required to report releases of these chemicals by July 1st.

There are currently over <u>650 chemicals</u> covered by the TRI program including chemicals commonly used by printers, such as toluene, xylene, ethylbenzene, 1,2,4-trimethylbenzene, glycol ethers, solvents, and metals. Of particular interest to lithographic printers is the wide use of glycol ethers in fountain solutions and more recently in cleaning solutions, to take the place of solvents with high vapor pressures. It is important to mention that "glycol ethers" is a chemical category and within this category there are hundreds of individual chemicals that are reportable. Safety Data Sheets (SDS) do not indicate the presence of "glycol ethers" as a constituent of a raw material so a printer must look up each listed constituent and compare it to the list of TRI chemicals to determine whether is it reportable.

For more information, go to https://www.epa.gov/toxics-release-inventory-tri-program or contact Ann O'Brien (aobrien@scsengineers.com) or Cheryl Moran (cmoran@scsengineers.com) at SCS Engineers in Madison, WI.

Ann O'Brien is a Project Manager with SCS Engineers. During her 32-year career in the printing industry she was responsible for environmental compliance programs, including, but not limited to, air and water quality permitting, environmental recordkeeping, reporting and monitoring programs, hazardous waste management, environmental compliance audits, and environmental site assessments and due diligence associated with real estate transactions and corporate acquisitions.