**TRI (SARA 313, Form R) Reporting Due July 1st**

EPA’s Toxic Release Inventory (TRI) reports are due July 1. Does your company need to submit them?

**What Is It?**

TRI first came into existence in 1986 as part of the Superfund Amendments and Reauthorization Act (SARA) and Emergency Planning and Community Right-to-Know Act (EPCRA). TRI’s creation was influenced by an event in Bhopal, India in 1984 where a cloud of toxic gas from the Union Carbide chemical plant killed thousands. Then in 1985 a serious chemical release occurred to a similar chemical plant in West Virginia. EPA wanted a way for the public to learn more information about the chemicals used in their communities so it setup a reporting system for companies using potentially harmful chemicals above certain threshholds.

**What’s the Difference Between TRI, SARA 313 and Form R?**

There are other names that are often used to refer to TRI reporting.

The first is “SARA 313.” TRI reporting is covered under Section 313 of SARA. Thus, TRI reporting is also referred to as “SARA 313” reporting. Other SARA reporting requirements include SARA 311 and 312 which are the Tier II chemical inventory reporting requirements we covered [in our EPCRA Tier II blog](https://isienvironmental.com/index.php/epcra-tier-ii-blog/), SARA 304 which is emergency spill reporting, and SARA 302 and 303 which cover emergency planning and notification requirements.

TRI reporting can also be known as “Form R” reporting. This is because one of the names of the forms used for TRI reporting is called Form R.

**Reporting Criteria**

In order to qualify for TRI reporting, your company must meet this criteria:

* Employ 10 or more employees;
* Fall under an [identified NAICS code](https://www.epa.gov/toxics-release-inventory-tri-program/my-facilitys-six-digit-naics-code-tri-covered-industry) from the 2017 NAICS list. (The 2017 NAICS is a new requirement this year); and,
* Manufactures, processes, or uses a chemical on the [TRI list of approximately 650 chemicals](https://www.epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals) at a threshold above allowed levels. These chemicals have been identified as ones with significant effects to the environment or human health.

**Submitting the Forms**

TRI uses two different forms, Form R and Form A. You will use Form R to identify your chemicals. Form A is a shortened form and only available if your company meets certain criteria in type of chemical, quantity, and waste generated. If you don’t meet the criteria for Form A, then you must use the longer Form R.

A form must be completed for each chemical you manufacture, process or use in quantities above the threshhold.

**How are TRI Reports Submitted?**

TRI reports are completed federally through EPA’s TRI-MEweb website. You will need to make copies to submit to your state agency as well.

This information will become public information and be searchable in an online database.

**Have Questions? Need Help?**

Do you need help with this environmental reporting requirement? iSi’s compliance team can help determine if you are required to submit and help you get the forms submitted. [Contact us here for more information and pricing.](https://isienvironmental.com/index.php/pricing/)