

## **SARA 313 REPORTING**

**Purpose** This Meteorology and Air Quality Group (MAQ) procedure describes the steps taken by MAQ for the Laboratory to comply with the reporting requirement of Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA).

**Scope** This procedure applies to the reporting of any toxic chemical at the Laboratory over specified thresholds in accordance with Section 313 of EPCRA.

**In this procedure** This procedure addresses the following major topics:

<b>Topic</b>	<b>See Page</b>
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**Hazard Control Plan** The hazard evaluation associated with this work is documented in HCP-MAQ-Office Work.

**Signatures**

Prepared by:  _____ <span style="float: right;">Margie Stockton, MAQ</span>	Date:  <u>4/4/02</u>
Approved by:  _____ <span style="float: right;">Scott Miller, Regulatory Line Services Team Leader</span>	Date:  <u>4/4/02</u>
Approved by:  _____ <span style="float: right;">Terry Morgan, QA Officer</span>	Date:  <u>4/4/02</u>
Work authorized by:  _____ <span style="float: right;">Jean Dewart, MAQ Acting Group Leader</span>	Date:  <u>4/8/02</u>

02/09/04

### **CONTROLLED DOCUMENT**

This copy is uncontrolled if no signatures are present or if the copy number stamp is black. Users are responsible for ensuring they work to the latest approved revision.

## General information about this procedure

**Attachments** This procedure has the following attachments:

Number	Attachment Title	No. of pages
1	Example Form R, for 2000 reporting year	5

**History of revision**

This table lists the revision history and effective dates of this procedure.

Revision	Date	Description Of Changes
0	8/30/99	New document.
1	1/4/01	Updated to reflect changes in the EPCRA requirements.
2	4/15/02	Minor grammatical changes to clarify meaning, updated Form R attachment, updated regulatory drivers section to reflect new lead threshold, and more detail added on estimating releases.

**Who requires training to this procedure?**

The following personnel require training before implementing this procedure:

- Individuals assigned to track and report SARA 313 chemicals procured and used at LANL.

**Training method**

The training method for this procedure is “**self-study**” (reading) and is documented in accordance with the procedure for training (MAQ-024)

**Definitions specific to this procedure**

Process: The preparation of a listed toxic chemical, after its manufacture, for distribution in commerce.

Manufacture: To produce, prepare, compound, or import a listed toxic chemical.

Otherwise use: Any activity involving a listed toxic chemical at a facility that does not fall under the definitions of “manufacture” or “process.”

Persistent Bioaccumulative Toxics: A subset of chemicals defined by the EPA that have much lower chemical-specific thresholds for reporting under SARA Section 313. These lower thresholds first became effective for reporting year 2000.

## General information, continued

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### References

The following documents are referenced in this procedure:

- MAQ-024, “Personnel Training”
  - MAQ-309, “Chemical Procurement Tracking”
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### Note

Actions specified within this procedure, unless preceded with “should” or “may,” are to be considered mandatory guidance (i.e., “shall”).

## Reporting requirements and history

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### Regulatory driver

The Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), Title III, Section 313, also known as the Superfund Amendment and Reauthorization Act (SARA), requires owners and operators of manufacturing, processing, and production facilities to annually report their toxic chemical releases, according to a chemical list, to all environmental mediums (air, water, land, and off-site transfers.). Executive Order 12856, dated August 3, 1993 requires all federal facilities, regardless of SIC code, to report their toxic chemical use and resulting releases under SARA 313. On October 29, 1999, the EPA promulgated a final rule lowering the thresholds for reporting under SARA Section 313 for certain persistent bioaccumulative toxic chemicals (64 FR 58666). On January 17, 2001, the EPA promulgated a final rule lowering the threshold for reporting lead and lead compounds under SARA Section 313.

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### Form R

The annual report required by regulation is a form produced by the EPA entitled “Form R.” A completed Form R must be submitted for each SARA Section 313 toxic chemical manufactured, processed, or otherwise used in excess of SARA Section 313 thresholds. The Form R contains sections for the facility identification, chemical identification, and release estimates for all environmental media (see Attachment 1 for an example Form R).

Each year, the EPA publishes a new Form R and instruction booklet. The chapter *Forms and data requests* of this procedure contains additional information and ordering instructions.

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### LANL reporting history

LANL has been voluntarily filing the Form R reports since 1987. The Form R report is submitted to the EPA and the State Emergency Response Coordinator. LANL also submits a written report and Form R to the Department of Energy (DOE). The written report gives a more detailed account of how LANL determined which chemicals need to be reported, how each reportable chemical is used, how much of each chemical is used, and documents the release calculations for each reportable chemical.

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### Reporting deadlines

The Form R for any calendar year must be submitted on or before July 1 of the following year. This deadline is subject to change if the EPA finds it necessary to do so. Data collection and analysis should begin in January in order to meet this deadline.

## Parameters used within the procedure

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### Section 313 chemicals

The SARA Section 313 chemical list includes over 600 chemicals and may be updated annually by the EPA. The list is posted on EPA's web site ([www.epa.gov/tri](http://www.epa.gov/tri)) and in the Form R instruction booklet that is published annually by the EPA.

The EPA guidance, such as the TRI website, should be consulted prior to starting each reporting year analysis to determine if any chemical thresholds have changed.

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### Procurement data

The data initially evaluated to determine which chemicals may be reportable under SARA Section 313 are gathered from LANL's various chemical procurement systems as described in procedure MAQ-309. An initial assumption in the threshold determination is that procurement quantities are equivalent to usage quantities.

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### Section 313 thresholds

Any chemical identified through procurement records that has been purchased in volumes greater than 75% of threshold (rule of thumb), or in excess of 10,000 lb is further analyzed, as specified by this procedure. The 10,000 lb is chosen as a starting point because it is the most conservative threshold level of the three activity determinations defined (see definitions).

Process Threshold: 25,000 lb

Manufacture Threshold: 25,000 lb

Otherwise Use Threshold: 10,000 lb

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### Persistent bioaccumulative toxics thresholds

Effective beginning reporting year 2000, a subset of approximately 20 chemicals identified as persistent bioaccumulative toxics must be evaluated against much lower thresholds. The thresholds for reporting are chemical specific, typically 100 lb or 10 lb, but can be as low as 0.1 gram. For this group of chemicals, the procurement data must be evaluated against each chemical-specific threshold. Persistent bioaccumulative toxics (PBTs) used at LANL include mercury (reporting threshold 10 lb) and lead (reporting threshold 100 lb).

## Parameters used within the procedure, continued

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**Exemptions** Toxic chemicals used in the following activities are exempt from SARA Section 313 reporting:

- Laboratory activities such as soil dissolution, ionization column recharge, and sample preservation
- Routine janitorial or facility grounds maintenance
- Employees' personal use
- Motor vehicle maintenance and operations
- Structural component of the facility

Additionally, SARA Section 313 chemicals that are contained in articles are exempt from threshold determinations and release calculations. Articles are defined as items that are formed to a specific shape or design during manufacturing and have end use functions dependent on its shape of design during use. To maintain the article exemption, the articles must not release more than 0.5 lb of any SARA Section 313 chemicals during their normal use. Examples of articles include batteries, light bulbs, and lead pipe.

Finally, SARA Section 313 includes a de minimis exemption for minimal concentrations of chemicals contained in mixtures or other trade name products. The de minimis concentrations are set by EPA at either 1% for non-carcinogens, or 0.1% for carcinogens or suspected carcinogens. The de minimis exemption cannot be used for chemicals that are persistent bioaccumulative toxics (PBTs).

## Refining procurement data

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### **Determining actual usage**

Contact the user of each chemical that was procured in excess of 75% of the initial 10,000-lb threshold. A site operator or manager can provide a complete description of the processes in which the chemical is used and how much of the chemical was used during the reporting period.

After gathering information on how each large volume chemical is used, review the activity exemptions that may be applicable according to the instruction booklet mentioned earlier. Using the information provided, determine the appropriate activity (process, manufacture, and otherwise use) for the various procurement amounts. If the chemical still exceeds any specific threshold, obtain more accurate information on actual usage quantities from the site operator or manager.

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### **Chemical use not captured through procurement records**

The procurement data provide the baseline data on the amount of each SARA Section 313 chemical used. However, there are avenues for SARA Section 313 chemicals to be manufactured, processed, or otherwise used at LANL that would not be captured through procurement records. Examples of these activities include:

- Lead bullets shot at the firing range
- HE burned and HE expended at DX
- Activities involving melting, reforming and decontaminating lead shielding
- Asphalt production
- Addition of mercury to the LANSCE shutters.

Operating parameters and material throughput for these types of activities must be obtained from the Division or Group personnel. Information on the amount of SARA Section 313 chemicals manufactured, processed, or otherwise used from these activities can be calculated based on the information provided. The previous year's SARA Section 313 files should be reviewed to determine which groups to contact. Additionally, the ESH-ID database should be reviewed to determine any new activities that use SARA Section 313 chemicals that might not be captured in the procurement systems.

## Refining procurement data, continued

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### **Finalize threshold determinations**

After all usage data are collected from both the procurement systems and the various activities described above, estimate an actual usage number for each chemical. Compare this actual usage number to the thresholds again to see if any have been exceeded. If they are not exceeded, the chemical does not need to be reported. If the thresholds have been exceeded, follow the steps in the block “Estimate Environmental Releases ” on p. 7 to produce multi-media release estimates for each reportable chemical.

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### **Refining threshold evaluations for PBTs**

For the subset of persistent bioaccumulative toxics (PBTs), a similar analysis is done to refine the threshold evaluations. For any PBT that procurement records indicate may be near its applicable threshold (rule of thumb, 75% of the threshold), the additional analyses described above must be done. The activity exemptions described in this procedure can be applied to the PBTs. Additionally, the activity thresholds (manufactured, processed, and otherwise used) should be determined for the PBTs. The only difference is that for PBTs, the thresholds for manufactured, processed or otherwise used, are chemical-specific. Finally, for one of the PBTs, dioxin, only the manufacturing of dioxin needs to be evaluated for SARA Section 313 applicability.

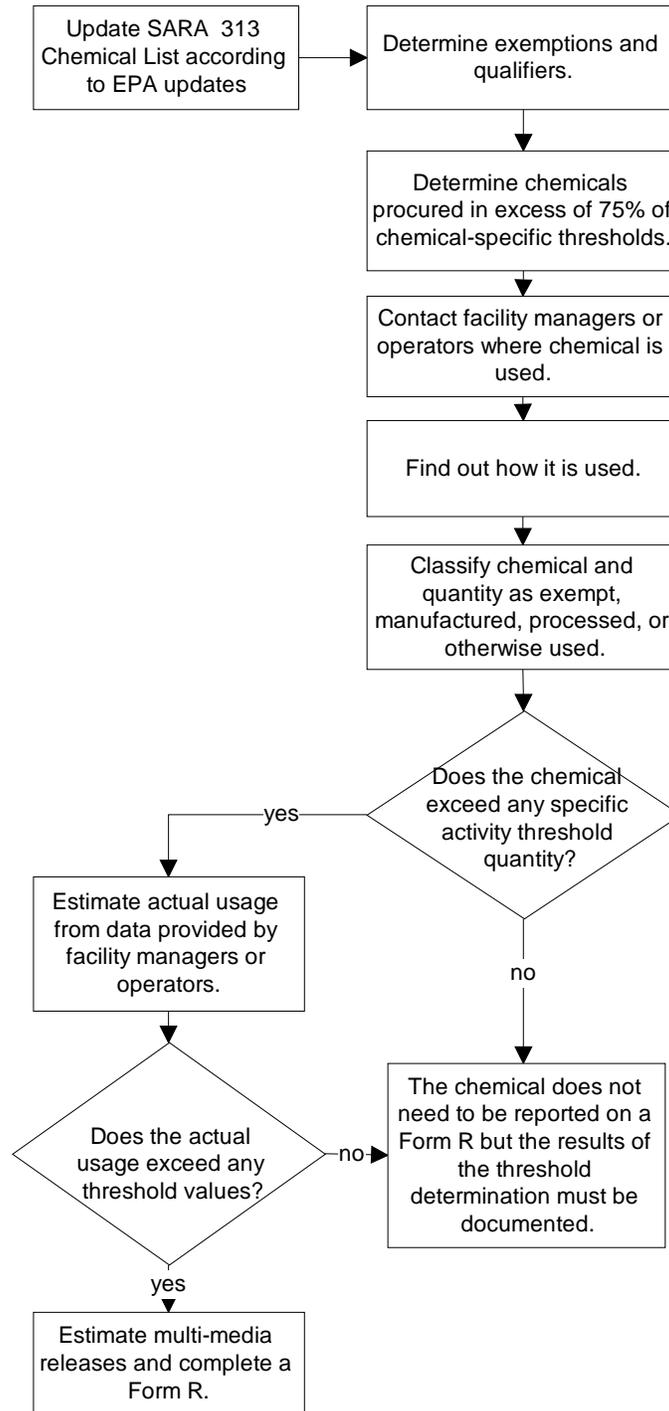
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### **Example: Chlorine**

Chlorine procurements at the Laboratory in 1996 exceeded the 10,000 lb initial threshold. The bulk of the chlorine was used for water treatment. Site managers were contacted to find out how each treatment facility uses chlorine. After talking to the managers, it was determined that the “process” threshold could be applied to some of the chlorine used to treat drinking water. The process threshold is applied to a portion of the chlorine used in drinking water that is sold back to the community. The “otherwise use” threshold was applied to all other uses of chlorine for water treatment. The site managers also provided actual usage numbers. The usage numbers were compared to two different thresholds: “process” and “otherwise used.” From this comparison, it was determined that chlorine did not need to be reported because the actual usage numbers were below the applicable thresholds.

## Refining procurement data, continued

**Steps to refine data** The flow chart below shows the steps necessary to determine if Form R and release estimates are required.



## Estimating releases

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**Estimate environmental releases** For each chemical that exceeds a threshold, a Form R must be completed. The Form R includes information on releases to the environment via air emissions, water discharges, and waste disposal. The process for obtaining and processing these data is described in the blocks below.

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**Estimate air emissions** Air emissions must be reported separately for point sources and fugitive sources. Calculate and sum all sources of air emissions for each reportable chemical and include these on the Form R. Emissions may be calculated using source test data, published emission factors such as EPA AP-42, mass balance, or other engineering calculations.

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**Estimate water discharges** Obtain from ESH-18 wastewater data and stormwater data for specific chemicals. The data needed includes sampling analytical data for the specific reportable chemicals and the volume of wastewater and stormwater discharges into each receiving water body. Also contact the Rad Liquid Waste Treatment Facility (RLWTF) to obtain chemical-specific data for the wastewater treated and discharged there. Include chemical releases from both wastewater discharges and stormwater on the Form R.

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**Estimate waste disposal** Obtain chemical-specific waste disposal records from the Facility Waste Management Group (FWO-WFM). The data are provided for all disposal records containing the chemical requested in the waste profile description. Evaluate these data to take out laboratory waste, waste articles, and any other exempt waste. Report on the Form R only the amount of the reportable chemical in the waste. Therefore, for each waste record, the total weight of the waste stream must be multiplied by the concentration or percent of the reportable chemical. Then divide the data out into separate totals for each location where the waste is shipped and report on separate line items in Section 6 of the Form R.

## Forms and data requests

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**EPA Form R** The Form R is produced by the EPA and can be downloaded from the EPA's web site ([www.epa.gov/tri](http://www.epa.gov/tri)). Specific instructions about downloading are given on the web site.

The EPA also has a hotline where any questions about the Form R can be answered and the instructions for filling out the forms can be requested. After the form has been completed according to the instructions, mail an electronic copy in the form of a disk to the EPA; include a letter with a certification statement signed by a responsible individual. In addition, send a copy to the New Mexico Emergency Response Commission. Also send disks to DOE along with the written report for submission.

Emergency Planning, Community Right-to-Know Act (EPCRA) Hotline: 1 (800) 535-0202

EPA's Home Page: <http://www.epa.gov/epahome/index.html>

EPA's Automated Form R website: <http://www.epa.gov/tri/report.htm>

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**Data requests** Additional data may be requested by other DOE and LANL organizations.

## Records resulting from this procedure

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### Records

The following records generated as a result of this procedure are to be submitted as records to the records coordinator:

- Completed Form Rs
- DOE Documentation
- Procurement records showing total quantity of each SARA Section 313 chemical procured
- Documentation of threshold determinations for individual high volume chemicals
- Calculations for estimating releases

[Click here to record “self-study” training to this procedure.](#)

(IMPORTANT: Type or print; read instructions before completing form)

<p><b>EPA</b> United States Environmental Protection Agency</p>	<h1>FORM R</h1>	<p><b>TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM</b></p>

<p><b>WHERE TO SEND COMPLETED FORMS:</b> 1. EPCRA Reporting Center P.O. Box 3348 Merrifield, VA 22116-3348 ATTN: TOXIC CHEMICAL RELEASE INVENTORY</p>	<p>2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)</p>	<p>Enter "X" here if this is a revision</p>
		<p>For EPA use only</p>

**Important: See instructions to determine when "Not Applicable (NA)" boxes should be checked.**

**PART I. FACILITY IDENTIFICATION INFORMATION**

**SECTION 1. REPORTING YEAR 2000**

**SECTION 2. TRADE SECRET INFORMATION**

<p><b>2.1</b> Are you claiming the toxic chemical identified on page 2 trade secret? <input type="checkbox"/> Yes (Answer question 2.2; Attach substantiation forms) <input checked="" type="checkbox"/> No (Do not answer 2.2; Go to Section 3)</p>	<p><b>2.2</b> Is this copy <input type="checkbox"/> Sanitized <input type="checkbox"/> Unsanitized (Answer only if "YES" in 2.1)</p>
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**SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)**

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
DOUGLAS STAVERT AIR QUALITY GROUP LEADER		06/26/2001

**SECTION 4. FACILITY IDENTIFICATION**

<b>4.1</b> TRI Facility ID Number	87545LSLMSLOSAL	
Facility or Establishment Name	Facility or Establishment Name or Mailing Address(if different from street address)	
U.S. DOE LOS ALAMOS NATIONAL LABORATORY - UNIV OF CALIFORNIA		
Street	Mailing Address	
P.O. BOX 1663		
City/County/State/Zip Code	City/State/Zip Code	Country (Non-US)
LOS ALAMOS LOS ALAMOS NM 87544-0000		

**4.2** This report contains information for:  
(Important : check a or b; check c or d if applicable) a.  An entire facility b.  Part of a facility c.  A Federal facility d.  GOCO

<b>4.3</b> Technical Contact Name	DOUGLAS STAVERT	Telephone Number (include area code)	(505) 665-0235
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<b>4.4</b> Public Contact Name	GEORGE VAN TIEM	Telephone Number (include area code)	(505) 667-6211
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<b>4.5</b> SIC Code (s) (4 digits)	<b>Primary</b>					
	a. 9711	b.	c.	d.	e.	f.

<b>4.6</b> Latitude	Degrees	Minutes	Seconds	Longitude	Degrees	Minutes	Seconds
	35	49	51		106	14	15

<b>4.7</b> Dun & Bradstreet Number(s) (9 digits)	<b>4.8</b> EPA Identification Number (RCRA I.D. No.) (12 characters)	<b>4.9</b> Facility NPDES Permit Number(s) (9 characters)	<b>4.10</b> Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)
a. NA	a. NM0890010515	a. NM0028355	a. NA
b.	b.	b. NM0028576	b.

**SECTION 5. PARENT COMPANY INFORMATION**

<b>5.1</b> Name of Parent Company	NA <input type="checkbox"/>	U.S. DEPARTMENT OF ENERGY
<b>5.2</b> Parent Company's Dun & Bradstreet Number	NA <input checked="" type="checkbox"/>	

<b>EPA FORM R</b> <b>PART II. CHEMICAL-SPECIFIC INFORMATION</b>	TRI Facility ID Number
	87545LSLMSLOSAL
	Toxic Chemical, Category or Generic Name
	MERCURY

**SECTION 1. TOXIC CHEMICAL IDENTITY** (Important: DO NOT complete this section if you completed Section 2 below.)

<b>1.1</b>	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical)	7439976															
<b>1.2</b>	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)	MERCURY															
<b>1.3</b>	Generic Chemical Name (Important: Complete only if Part 1, Section 2.1 is checked "yes". Generic Name must be structurally descriptive.)	NA															
<b>1.4</b>	<b>Distribution of Each Member of the Dioxin and Dioxin-like Compounds Category.</b> (If there are any numbers in boxes 1-17, then every field must be filled in with either 0 or some number between 0.01 and 100. Distribution should be reported in percentages and the total should equal 100%. If you do not have speciation data available, indicate NA.)																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
	NA <input checked="" type="checkbox"/>																

**SECTION 2. MIXTURE COMPONENT IDENTITY** (Important: DO NOT complete this section if you completed Section 1 above.)

<b>2.1</b>	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, letters, spaces, and punctuation.)	NA
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**SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY**  
(Important: Check all that apply.)

<b>3.1</b>	Manufacture the toxic chemical:	<b>3.2</b>	Process the toxic chemical:	<b>3.3</b>	Otherwise use the toxic chemical:
a. <input type="checkbox"/> Produce	b. <input type="checkbox"/> Import	a. <input type="checkbox"/> As a reactant	b. <input type="checkbox"/> As a formulation component	a. <input type="checkbox"/> As a chemical processing aid	b. <input type="checkbox"/> As a manufacturing aid
If produce or import:		c. <input type="checkbox"/> As an article component	d. <input type="checkbox"/> Repackaging	c. <input checked="" type="checkbox"/> Ancillary or other use	
c. <input type="checkbox"/> For on-site use/processing	d. <input type="checkbox"/> For sale/distribution	e. <input type="checkbox"/> As an impurity			
e. <input type="checkbox"/> As a byproduct	f. <input type="checkbox"/> As an impurity				

**SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ONSITE AT ANY TIME DURING THE CALENDAR YEAR**

<b>4.1</b>	<input type="text" value="04"/> (Enter two-digit code from instruction package.)
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**SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE**

		A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (enter code)	C. % From Stormwater
<b>5.1</b>	Fugitive or non-point air emissions	NA <input type="checkbox"/>	0.3	M
<b>5.2</b>	Stack or point air emissions	NA <input type="checkbox"/>	0.3	M
<b>5.3</b>	Discharges to receiving streams or water bodies (enter one name per box)			
	Stream or Water Body Name			
<b>5.3.1</b>	SANDIA CANYON TRIBUTARY TO RIO GRANDE	0.3	M	000.00
<b>5.3.2</b>	WATER CANYON TRIBUTARY TO RIO GRANDE	0.1	M	090.00
<b>5.3.3</b>	PAJARITO CANYON TRIBUTARY TO RIO GRANDE	0.2	M	100.00

If additional pages of Part II, Section 5.3 are attached, indicate the total number of pages in this box  and indicate the Part II, Section 5.3 page number in this box.  (example: 1,2,3, etc.)

EPA form 9350-1(Rev. 01/2001) - Previous editions are obsolete. \* For Dioxin or Dioxin-like compounds, report in grams/year \*\* Range Codes: A= 1 - 10 pounds; B= 11- 499 pounds; C= 500 - 999 pounds.

<b>EPA FORM R</b> <b>PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)</b>	TRI Facility ID Number
	87545LSLMSLOSAL
	Toxic Chemical, Category or Generic Name
	MERCURY

**SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE (Continued)**

		NA	A. Total Release (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)
5.4.1	Underground Injection onsite to Class I Wells	<input checked="" type="checkbox"/>	NA	
5.4.2	Underground Injection onsite to Class II-V Wells	<input checked="" type="checkbox"/>	NA	
5.5	Disposal to land onsite			
5.5.1A	RCRA Subtitle C landfills	<input checked="" type="checkbox"/>	NA	
5.5.1B	Other landfills	<input checked="" type="checkbox"/>	NA	
5.5.2	Land treatment/application farming	<input checked="" type="checkbox"/>	NA	
5.5.3	Surface Impoundment	<input checked="" type="checkbox"/>	NA	
5.5.4	Other disposal	<input checked="" type="checkbox"/>	NA	

**SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS**

**6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)**

**6.1.A Total Quantity Transferred to POTWs and Basis of Estimate**

<b>6.1.A.1. Total Transfers</b> (pounds/year*) (enter range code** or estimate)	<b>6.1.A.2 Basis of Estimate</b> (enter code)
NA	

<b>6.1.B.1</b>	POTW Name	NA
POTW Address		
City	State	County
	Zip	-

<b>6.1.B.2</b>	POTW Name
POTW Address	
City	State
	County
	Zip

If additional pages of Part II, Section 6.1 are attached, indicate the total number of pages in this box  and indicate the Part II, Section 6.1 page number in this box  (example: 1,2,3, etc.)

**SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS**

<b>6.2.1</b>	Off-Site EPA Identification Number (RCRA ID No.)	UTD981552177
Off-Site Location Name	SAFETY KLEEN (ARAGONITE), INC.	
Off-Site Address	11600 NORTH APTUS ROAD	
City	ARAGONITE	State
	UT	County
	TOOELE	Zip
	84029	Country (Non-US)
Is location under control of reporting facility or parent company?		
	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

\* For Dioxin or Dioxin-like compounds, report in grams/year

<b>EPA FORM R</b>						TRI Facility ID Number		
<b>PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)</b>						87545LSLMSLOSAL		
						Toxic Chemical, Category or Generic Name		
						MERCURY		
<b>SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS (Continued)</b>								
<b>A. Total Transfers</b> (pounds/year*) (enter range code** or estimate)		<b>B. Basis of Estimate</b> (enter code)			<b>C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery</b> (enter code)			
1. 9.6		1. C			1. M99			
2. NA		2.			2.			
3.		3.			3.			
4.		4.			4.			
<b>6.2.2</b> Off-Site EPA Identification Number (RCRA ID No.)					COD980591184			
Off-Site location Name		ONYX ENVIRONMENTAL SERVICES, L.L.C.						
Off-Site Address		9131 EAST 96TH AVENUE						
City	HENDERSON	State	CO	County	DENVER	Zip	80640-	
						Country (Non-US)		
Is location under control of reporting facility or parent company?						<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<b>A. Total Transfers</b> (pounds/year*) (enter range code** or estimate)		<b>B. Basis of Estimate</b> (enter code)			<b>C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery</b> (enter code)			
1. 8.0		1. C			1. M24			
2. NA		2.			2.			
3.		3.			3.			
4.		4.			4.			
<b>SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY</b>								
<input type="checkbox"/> Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.								
<b>a. General Waste Stream</b> (enter code)	<b>b. Waste Treatment Method(s) Sequence</b> [enter 3-character code(s)]				<b>c. Range of Influent Concentration</b>	<b>d. Waste Treatment Efficiency Estimate</b>	<b>e. Based on Operating Data ?</b>	
<b>7A.1a</b>	<b>7A.1b</b>	1	C09	2	P12	<b>7A.1c</b>	<b>7A.1d</b>	<b>7A.1e</b>
W	3	P31	4	5		4	97 %	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
	6		7	8				
<b>7A.2a</b>	<b>7A.2b</b>	1		2		<b>7A.2c</b>	<b>7A.2d</b>	<b>7A.2e</b>
NA	3		4	5			%	Yes <input type="checkbox"/> No <input type="checkbox"/>
	6		7	8				
<b>7A.3a</b>	<b>7A.3b</b>	1		2		<b>7A.3c</b>	<b>7A.3d</b>	<b>7A.3e</b>
	3		4	5			%	Yes <input type="checkbox"/> No <input type="checkbox"/>
	6		7	8				
<b>7A.4a</b>	<b>7A.4b</b>	1		2		<b>7A.4c</b>	<b>7A.4d</b>	<b>7A.4e</b>
	3		4	5			%	Yes <input type="checkbox"/> No <input type="checkbox"/>
	6		7	8				
<b>7A.5a</b>	<b>7A.5b</b>	1		2		<b>7A.5c</b>	<b>7A.5d</b>	<b>7A.5e</b>
	3		4	5			%	Yes <input type="checkbox"/> No <input type="checkbox"/>
	6		7	8				
If additional pages of Part II, Section 6.2/7A are attached, indicate the total number of pages in this box and indicate the Part II, Section 6.2/7A page number in this box :						4		
						1	(example: 1,2,3, etc)	

\* For Dioxin or Dioxin-like compounds, report in grams/year

<b>EPA FORM R</b>	TRI Facility ID Number
<b>PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)</b>	87545LSLMSLOSAL
	Toxic Chemical, Category or Generic Name
	MERCURY

**SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES**

Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [enter 3-character code(s)]

1.       2.       3.       4.

**SECTION 7C. ON-SITE RECYCLING PROCESSES**

Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [enter 3-character code(s)]

1.       2.       3.       4.       5.   
 6.       7.       8.       9.       10.

**SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES**

		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1	Quantity released ***	14.6	21.3	21.3	21.3
8.2	Quantity used for energy recovery onsite	NA	NA	NA	NA
8.3	Quantity used for energy recovery offsite	NA	NA	NA	NA
8.4	Quantity recycled onsite	NA	NA	NA	NA
8.5	Quantity recycled offsite	6.5	9.5	9.5	9.5
8.6	Quantity treated onsite	NA	NA	NA	NA
8.7	Quantity treated offsite	NA	NA	NA	NA
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)	0			
8.9	Production ratio or activity index	0000005.73			
8.10	Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.				
	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)			
8.10.1	NA	a.	b.	c.	
8.10.2		a.	b.	c.	
8.10.3		a.	b.	c.	
8.10.4		a.	b.	c.	
8.11	Is additional information on source reduction, recycling, or pollution control activities included with this report? (Check one box)			YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>

EPA Form 9350-1 (Rev. 01/2001) - Previous editions are obsolete.

\* For Dioxin or Dioxin-like compounds, report in grams/year

\*\*\* Report releases pursuant to EPCRA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated onsite.