

SARA Title III

Section 313

- **Toxic Chemical Release Inventory Reporting**

SARA Title III Section 313 Toxic Chemical Release Inventory Reporting 40 Code of Federal Regulations (CFR) Part 372

Section 313 of Title III of the Superfund Amendments and Reauthorization Act (SARA Title III) of 1986 is commonly referred to as the Toxic Chemical Release Inventory (TRI). SARA Title III, also known as the Emergency Planning and Community Right-to-Know Act (EPCRA), is a federal act. Section 313 requires certain facilities to complete a report annually for specified toxic chemicals. Reports must be submitted to both the U.S. Environmental Protection Agency (EPA) and the State Emergency Response Commission (SERC) by July 1, and cover releases and other waste management activities of listed toxic chemicals during the preceding calendar year. Facilities also must report information on source reduction, recycling, and treatment under the Pollution Prevention Act of 1990.

The Michigan SARA Title III Program accepts all reports on behalf of the SERC.

The information below provides basic details about TRI reporting to assist the reader in determining whether the facility might have reporting obligations under Section 313. **For complete information, refer to the U.S. EPA's "Toxic Chemical Release Inventory Reporting Forms and Instructions"** (hereafter the Instructions). The Instructions are published every report year and contain detailed information and examples to help the user determine reporting obligations and complete the reports. The Instructions identify any changes in the requirements, chemical list, or forms since the previous report year.

Subject Facilities

A facility is subject to TRI reporting if it meets all of the following three criteria:

- It has ten or more full-time employees (or the equivalent of 20,000 hours per year).
- It is a "covered" industry, based on its primary North American Industry Classification System (NAICS) codes, or is a federal facility; see also: www.epa.gov/toxics-release-inventory-tri-program/my-facilitys-six-digit-naics-code-tri-covered-industry.
- It manufactures and/or imports, processes, or otherwise uses a listed toxic chemical or chemical compound above a specified amount, based on the activity for that toxic substance.

Section 313 defines a facility as "all buildings, equipment, structures, and other stationary items which are located on a single site or on contiguous or adjacent sites" [40 Code of Federal Regulations (CFR) 372.3] and having a single owner or operator. A facility may have more than one establishment at a site.

For Section 313 reporting, facilities now report using the NAICS codes instead of the Standard Industrial Classification (SIC) codes. Table 1 shows the covered industries, the SIC Major Group code, and corresponding NAICS groups. However, a facility should refer to the U.S. Census Bureau website, www.census.gov/eos/www/naics, to determine the appropriate NAICS code. To determine TRI-Covered Industry eligibility, facilities should also reference the U.S. EPA's website, "Is My Facility's Six-Digit NAICS Code a TRI-Covered Industry?" (www.epa.gov/toxics-release-inventory-tri-program/my-facilitys-six-digit-naics-code-tri-covered-industry).

Table 1. TRI Covered Industries by Industry Classification

Industry	SIC Codes	NAICS (suggested)
Manufacturing	20-39	311-339
Metal Mining	10 (except 1011, 1081, and 1094)	21222, 21223, 21229
Coal Mining	12 (except 1241) 4911, 4931, and 4939	21211
Electrical utilities	(limited to facilities that combust coal and/or oil for purpose of generating electricity for distribution in commerce)	22111, 22112
Treatment, storage and disposal facilities	4953 (limited to RCRA Subtitle C permitted or interim status facilities)	56221
Chemical and allied products wholesale distributors	5169	42469
Petroleum bulk plants and terminals	5171	42471
Solvent recovery services	7389 (limited to facilities primarily engaged in services on a contract or fee basis)	32599
Federal facilities	Must report by Executive Order 13148 if they meet the activity threshold.	

Toxic Chemicals and Activity Thresholds

Approximately 650 toxic chemicals and chemical compound categories are currently reportable under Section 313. These chemicals are listed in 40 CFR 372.65 and 40 CFR 372.28. The U.S. EPA can add, remove, or modify the Section 313 chemicals that must be reported. Facilities should check each year for changes to the toxic chemical registry and for qualifiers that apply to some chemicals at the following site: www.epa.gov/tri; select “Determine if Your Facility Must Report,” and then “TRI Chemicals.” The reportable chemicals are also included in the “U.S. EPA List of Lists” located in Appendix B of this guidebook or at www.epa.gov/epcra/epcracerclacaa-ss112r-consolidated-list-lists-march-2015-version.

On November 28, 2016 U.S. EPA has finalized a rule adding a hexabromocyclododecane (HBCD) category to the Toxics Release Inventory (TRI) list of reportable chemicals. This action will expand the scope of chemicals subject to TRI reporting and provide communities with more complete information on toxic chemical releases. See the “[Addition of Hexabromocyclododecane \(HBCD\) Category to TRI List Final Rule](http://www.epa.gov/toxics-release-inventory-tri-program/addition-hexabromocyclododecane-hbcd-category-tri-list-final?utm_medium=email&utm_source=govdelivery)” website (www.epa.gov/toxics-release-inventory-tri-program/addition-hexabromocyclododecane-hbcd-category-tri-list-final?utm_medium=email&utm_source=govdelivery).

HBCD is a brominated flame retardant used mainly in expanded polystyrene foam (EPS) and extruded polystyrene foam (XPS). EPS and XPS are used primarily for thermal insulation boards in the building and construction industry. HBCD may also be used as a flame retardant in textiles. Concerns about releases and uses of HBCD have been raised because it is found worldwide in the environment and wildlife and has also been found in human breast milk, fat tissue and blood.

U.S. EPA also determined that HBCD meets the environmental effects criterion for listing because it is highly toxic to aquatic and terrestrial organisms. Additionally, HBCD bioaccumulates and is persistent in the environment. As a result, HBCD meets the TRI criteria for a Persistent, Bioaccumulative, and

Toxic (PBT) chemical and is designated as a chemical of special concern, with a 100-pound reporting threshold.

For more information on the U.S. EPA's work with flame retardants, visit: www.epa.gov/assessing-and-managing-chemicals-under-tsca/fact-sheet-assessing-risks-flame-retardants and www.epa.gov/assessing-and-managing-chemicals-under-tsca/hexabromocyclododecane

Effective October 17, 2011, the administrative stay for reporting hydrogen sulfide under Section 313 was lifted. It was first included on the TRI report submitted in 2013 for report year 2012.

On November 7, 2013, the U.S. EPA finalized a rule that adds *ortho*-nitrotoluene to the TRI list of reportable chemicals. The rule was effective November 29, 2013, and was first applied in report year 2014.

On September 30, 2014, the U.S. EPA published a rule to finalize the addition of a nonylphenol category to the list of toxic chemicals subject to TRI reporting.

Activity thresholds are based on the manufacture, process, or otherwise use of Section 313 chemicals over a calendar year. Activity thresholds are 25,000 pounds manufactured *or* 25,000 pounds processed *or* 10,000 pounds otherwise used for chemicals that are *not* persistent, bioaccumulative, nor toxic (PBT).

PBT Chemicals

Beginning with the 2000 TRI report year, the U.S. EPA set lower activity thresholds for a group of chemicals identified as PBT. Lead and lead compounds were reclassified as PBT, with the exception of lead that is in stainless steel, brass, or bronze alloys. This exception retains the higher activity thresholds. The PBT chemicals and activity thresholds are listed in Table 2.

Activity Thresholds

When determining whether a Section 313 chemical exceeds an activity threshold, a facility must look at each activity *separately* for each chemical. Once an activity threshold is exceeded, a facility must determine releases and quantities managed as waste from all uses of the chemical at the facility. This includes any quantities of waste resulting from spills, remedial activities, or catastrophic events.

When determining whether a Section 313 chemical exceeds an activity threshold, a facility must look at each activity *separately* for each chemical. Once an activity threshold is exceeded, a facility must determine releases and quantities managed as waste from all uses of the chemical at the facility. This includes any quantities of waste resulting from spills, remedial activities, or catastrophic events.

Table 2. EPCRA Section 313 Listed PBT Chemicals and Activity Thresholds

Chemical	Threshold (in pounds unless otherwise noted)
Aldrin	100
Benzo(g,h,i)perylene	10
Chlordane	10
Dioxin and dioxin-like compounds	0.1 grams
Heptachlor	10
Hexachlorobenzene	10
Isodrin	10
Lead (not contained in stainless steel, bronze, or brass alloy)	100

CHAPTER 4: SARA Title III Section 313

Chemical	Threshold (in pounds unless otherwise noted)
Lead compounds	100
Mercury	10
Mercury compounds	10
Methoxychlor	100
Octachlorostyrene	10
Pendimethalin	100
Pentachlorobenzene	10
Polychlorinated biphenyl (PCBs)	10
Polycyclic aromatic compounds (PACs) ♦	100
Tetrabromobisphenol A (TBBPA)	100
Toxaphene	10
Trifluralin	100

Note: PBT chemical reporting was effective for 2000, except lead and lead compounds, which were effective for 2001.

♦ Four new chemicals were added to Polycyclic Aromatic Compounds category in 2010, bringing the total in this category to 25 chemicals.

Activities

- *Manufacture* – means to produce, prepare, compound, or import into the country a Section 313 chemical. This includes chemicals manufactured as an impurity or byproduct.
- *Process* – means the preparation of a Section 313 chemical, after its manufacture, for distribution into commerce. Processing usually involves the incorporation of a Section 313 chemical into a product.
- *Otherwise Use* – means any other use of a Section 313 chemical that is not manufactured or processed.

Exemptions

Exemptions to activity threshold determination and release and other waste management calculations are allowed for certain situations. These exemptions are briefly explained below. Refer to the TRI Instructions for detailed information on the exemptions.

- *Article Exemption* – applies to Section 313 chemicals contained in articles that are processed or otherwise used at a covered facility. The item or article must meet three specific criteria to retain the Article Exemption. Briefly, the article must: (1) be formed to a specific shape or design during manufacture, (2) have end use functions dependent in whole or in part upon its shape or design, and (3) not release a toxic chemical under normal circumstances of processing or otherwise use of the item at the facility.
- *De Minimis Exemption* – applies to certain minimal concentrations of non-PBT Section 313 chemicals in mixtures or trade name products that are processed or otherwise used. The de minimis concentration in a mixture "...is below 1 percent of the mixture, or 0.1 percent of the mixture in the case of a toxic chemical which is a carcinogen..." (40 CFR 372.38). De minimis concentrations are included in the Section 313 chemical list in the instructions.
- *Motor Vehicle Exemption* – applies to the otherwise use of products containing Section 313 chemicals used for maintaining motor vehicles operated at the facility (i.e., gasoline, lead acid batteries, cleaning solutions).

- *Otherwise Use Exemption* – applies to other uses of products containing Section 313 chemicals. The Otherwise Use Exemption includes chemicals used to maintain the facility structure, for routine janitorial or facility grounds maintenance, or for personal use by employees. This exemption does not apply to process-related equipment. Chemicals contained in intake water (used for processing or non-contact cooling) or in intake air (used either as compressed air or for combustion) may also be exempt.
- *Laboratory Activities Exemption* – applies to Section 313 chemicals used in a laboratory under the direct supervision of a “technically qualified individual.”
- *Coal Extraction Activities Exemption* – applies to a Section 313 chemical that is manufactured, processed, or otherwise used in extraction by facilities in SIC Major Group 12, Coal Mining.
- *Metal Mining Overburden Exemption* – applies to a Section 313 chemical that is a constituent of overburden and that is processed or otherwise used by facilities in SIC Major Group 10, Metal Mining.

Toxic Chemical Release Inventory Report

If a facility determines that it meets the criteria, it must submit the “**Form R – Toxic Chemical Release Inventory Reporting Form**” by July 1 to the U.S. EPA and the state. If the facility is in tribal lands, the report must be submitted to the U.S. EPA and the appropriate tribe. One “Form R” report must be submitted for each chemical that exceeds an activity threshold.

Each year, the U.S. EPA produces the “Toxic Chemical Release Inventory Reporting Forms and Instructions” and updates the web-based reporting program called *TRI-ME* (TRI Made Easy). Any changes to reporting criteria are incorporated into the Instructions and forms and *TRI-MEweb*. Instructions can be found on the U.S. EPA [TRI Program website \(www.epa.gov/tri\)](http://www.epa.gov/tri) under Annual Reporting for “Facilities,” “Guidance Documents.”

The “Form R” report data elements include:

- Facility information.
- Chemical information.
- Releases.
- Off-site transfers.
- On-site waste management activities.
- Source reduction and recycling.

Chemical Information

Facilities must identify the Section 313 chemical or chemical compound category being reported, the reportable activity (manufacture, process, otherwise use), and the maximum amount on site at any one time during the calendar year. The chemical or chemical category name should be entered as it appears in the toxic chemical registry.

There are two exceptions to reporting a chemical name that is not on the Section 313 list. In the case of a substantiated claim of trade secrecy, a facility can report a generic chemical name. The second is a case of a supplier claiming that a Section 313 chemical identity in a mixture or trade name product is proprietary or trade secret; in this situation, the facility can report a “mixture component identity.” These exceptions are rare.

Releases and Transfers

The quantities of Section 313 chemical releases or transfers off-site are reported in Sections 5 and 6 of the “Form R.” Quantities are reported in pounds per year, except for dioxin and dioxin-like compounds that are reported in grams per year. Dioxin and dioxin-like compounds category requires additional data reporting.

Release/Disposal

Facilities report the quantities released and disposed of on-site at the facility in Section 5. On-site releases include air releases (both fugitive and stack emissions), surface water discharges, disposal to deep injection wells (Class I or Class II-V), disposal to landfills, or release to surface impoundments or other land disposal. For surface water discharges, facilities must include the stream or water body name and percent of discharge from storm water.

Transfer

The quantities of Section 313 chemicals in wastes transferred off-site are reported in Section 6. This includes discharges to publicly owned treatment works (POTWs). Transfers to other off-site locations for disposal and further waste management must include the receiving facility name and address, quantity transferred, and a code that identifies whether the waste was disposed, recycled, treated, or used for energy recovery. For POTW discharges, facilities report the total amount discharged, as well as the POTW facility information.

Waste Management

Activities involving the Section 313 chemicals in waste managed on site must be reported in Section 7. Activities for on-site treatment, energy recovery, and recycling include:

- Treatment of the general waste stream containing the Section 313 chemical.
- Energy recovery use for Section 313 chemicals that have a significant heating value and are combusted in an energy recovery unit such as an industrial furnace, kiln or boiler.
- Recycling of the Section 313 chemical through solvents/organics recovery, metals recovery, and acid regeneration or other recycling activity.

Source Reduction

The federal Pollution Prevention Act (PPA) of 1990 established a national policy to prevent or reduce pollution at its source whenever feasible. Among other requirements, the act requires facilities to report quantities of the Section 313 chemicals managed as waste and any source reduction practices used with respect to that chemical during the year.

Source reduction information required by the PPA is reported in Section 8 of the “Form R.” Facilities report all releases and waste quantities for the Section 313 chemical, both on-site and off-site. The quantities reported in Sections 5 and 6 of the “Form R” and additional information are used to complete Section 8.

The U.S. EPA increased the prominence and accessibility of the pollution prevention information reported in Sections 8.10 and 8.11 in order to highlight and promote pollution prevention activities. In addition, new source reduction codes were added to the list of selections available for completing Section 8.10.

Source reduction activities aimed at a chemical during the year must also be reported. The source reduction activity for a specific chemical should be reported only in the year that it is first implemented. It should not be carried over to future years.

Form R Schedule 1 Reports

The dioxin and dioxin-like compounds category requires additional reporting beginning with Reporting Year 2008. Facilities must report the mass quantities for each reportable release or waste management activity for each of the 17 individual chemicals in the dioxin compound category. This additional information is submitted on the Schedule 1 report.

Form A Reports

An alternate “Form A Certification Statement” can be submitted for those chemicals that meet the eligibility requirement and threshold. The eligibility requirement for “Form A” is below one million pounds for an activity (manufacture or process or otherwise use) and less than 500 pounds of the annual reportable amount. This form cannot be used for reporting PBT chemicals. Refer to the Instructions for clarification on “Form A” criteria.

How to Submit Reports

Note: Facilities that submit TRI reporting forms (without claiming a trade secret), including revisions and withdrawals of TRI reporting forms, to the U.S. EPA must prepare, certify, and submit their data to the U.S. EPA electronically using the TRI online reporting software provided by the U.S. EPA.

Facilities must submit TRI reports to *both* the U.S. EPA and the state (or tribal government official) to comply with Section 313 reporting requirements. The U.S. EPA finalized rule 77 Federal Register (FR) 23409 that requires each facility located in tribal lands to submit TRI reports to the U.S. EPA and the appropriate tribe, rather than to the state in which the facility is geographically located. The final rule also provides the tribal chairperson or equivalent elected official of a tribe with the same opportunities as the governor of a state with regard to TRI-related requests and petitions. For a list of TRI Tribal Contacts, go to www2.epa.gov/toxics-release-inventory-tri-program/tri-tribal-contacts.

Facilities must file electronically to the U.S. EPA using *TRI-MEweb*. The submission will be sent simultaneously to the U.S. EPA and the State of Michigan and will fulfill the dual reporting requirement. Facilities in tribal lands will submit a paper copy of the TRI reports to the tribal government official. Facilities that submit, revise, or withdraw TRI reporting forms for report years 1991 through the present must do so using the *TRI-MEweb* application even if the original submittal did not use *TRI-MEweb*.

The only exception to the requirement to file TRI reports electronically to the U.S. EPA relates to TRI submissions that claim a trade secret (including sanitized and un-sanitized report forms) and revisions and withdrawals of such TRI submissions. These must be submitted to the U.S. EPA (and the state or tribal authority) on paper.

TRI-MEweb is an interactive application that helps a facility prepare, submit, and electronically certify the TRI reports.

If you are using *TRI-MEweb* for the first time, certifying officials must register prior to reporting at cdx.epa.gov. This registration requires the printing, completion, and mailing of an electronic

signature agreement (ESA) for the U.S. EPA approval. The time for the mailing and processing of this form is estimated to take two weeks. The U.S. EPA implemented an alternative method for certifying officials to apply for and process an ESA in real-time using a third-party identity verification vendor named LexisNexis.

The U.S. EPA will send an e-mail in January to former TRI filers that *TRI-MEweb* is open for the newest report year filing. The facility reporter can access *TRI-MEweb* by logging in to the U.S. EPA Central Data Exchange (CDX). The preparer and certifier must be registered at CDX (www.epa.gov/cdx), and the certifier must have an electronic signature agreement on file. *TRI-MEweb* maintains submissions on line for prior report years.

Complete information regarding TRI-ME reporting is found on the U.S. EPA website at www.epa.gov/tri. This site includes links for instructions and TRI “Forms R” and “A.”

Facilities with trade secret TRI reports submitted on paper will need to mail their reports separately to the U.S. EPA and the state or tribe to fulfill the dual reporting requirement. Information regarding where to mail reports to the U.S. EPA can be found on the U.S. EPA TRI Program website (www.epa.gov/tri). The address for the Michigan SARA Title III Program that accepts reports on behalf of the SERC is in Chapter 1, page 1-9 of this guidebook.

There are **no fees** associated with TRI reporting in Michigan.

Recordkeeping

Facilities reporting under Section 313 must keep copies of their reports for three years from the date of submission. Facilities also are required to keep any documents, calculations, or material used to determine reporting obligations and waste estimates. If the U.S. EPA has questions about reported data, it may request the supporting documentation. The U.S. EPA may also request documentation during a TRI inspection for all Section 313 chemicals, reported or not.

While the regulation requires a facility to maintain documents for three years, federal authority can take enforcement action back five years. It is recommended that a facility keep the reports and documentation for five years in the event of a TRI inspection.

Use of TRI Data

Under the Community Right-to-Know provisions of SARA Title III, TRI information must be made available to the public. The public can get information about toxic chemicals at reporting facilities, their uses, and releases into the environment. The U.S. EPA maintains the national TRI information in a database that is available to anyone through the Internet. TRI data are also important to the State in other regulatory programs and for other environmental reports.

TRI Program Contacts and Assistance

- Michigan SARA Title III Program
Phone: 517-284-SARA
Web site: www.michigan.gov/sara
E-mail: deq-sara@michigan.gov
- U.S. EPA Region 5 TRI Program
Brad Grams
Phone: 312-886-7747
E-mail: grams.bradley@epa.gov
- Saginaw Chippewa Indian Tribe
Craig Graveratte
Environmental Response Program Specialist
7070 East Broadway
Mt Pleasant, Michigan 48858
Phone: 989-775-4081
E-mail: cgraveratte@sagchip.org
- U.S. EPA Toxics Release Inventory Program
Web site: www.epa.gov/tri
- U.S. EPA's Superfund, TRI, EPCRA, RMP, and Oil Information Center
www.epa.gov/epcra/forms/contact-us-about-emergency-planning-and-community-right-know-act-epcra
Phone: 800-424-9346; select option 3
TDD: 800-553-7672

Type of Question you may have	Where to find your answer
Frequent Questions about the TRI Program	TRI Question and Answer Database: Visit www.epa.gov/toxics-release-inventory-tri-program/guidance-documents-tri-reporting and select TRI Frequent Questions
Questions about TRI data submitted for a specific facility	Search the U.S. EPA's Envirofacts database: www3.epa.gov/enviro/
Central Data Exchange: technical questions related to CDX accounts, submission status, TRI-MEweb submission	CDX Hotline: Email: helpdesk@epacdx.net Call 888-890-1995.
TRI reporting assistance: verification of the U.S. EPA's receipt of reports, electronic signature agreements, report errors	TRI Data Processing Center: Email: tridpc@epacdx.net Call 703-227-7644 or Fax to 703-227-4199
Electronic Facility Data Profiles (eFDPs)	TRI Data Processing Center: Email to tri.efdp@epacdx.net Call 703-227-7644 Visit tri-epa.zendesk.com/hc/en-us/articles/212345657-Viewing-an-electronic-Facility-Data-Profile-in-TRI-MEweb

CHAPTER 4: SARA Title III Section 313

Type of Question you may have	Where to find your answer
<p><i>If you have already tried the support avenues listed above, but you still have unresolved TRI problems or issues.</i></p>	<p>TRI Program Division: Email: tri.help@epa.gov Call 202-566-1415</p>
<p>Incentives for regulated entities to voluntarily discover, disclose, and correct noncompliance with federal environmental laws and regulations.</p>	<p>U.S. EPA Audit Policy: Visit www2.epa.gov/compliance/epas-audit-policy</p>
<p>TRI Tribal Contacts and where to send hard copy TRI forms to meet requirements of the TRI tribal rule.</p>	<p>TRI contacts: Visit www.epa.gov/tri and select Contact Us at the top right side of the page</p>

SAMPLE FORM R

Form Approved OMB Number: 2025-0002
 Approval Expires: 11/30/2017 Page 1 of 6

<b style="font-size: 1.2em;">EPA United States Environmental Protection Agency		<b style="font-size: 1.2em;">FORM R Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also Known as Title III of the Superfund Amendments and Reauthorization Act		TRI Facility ID Number _____
This section only applies if you are revising or withdrawing a previously submitted form, otherwise leave blank.		Revision (Enter up to two code(s)) [] []	Withdrawal (Enter up to two code(s)) [] []	
IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.				
PART I. FACILITY IDENTIFICATION INFORMATION				
SECTION 1. REPORTING YEAR _____				
SECTION 2. TRADE SECRET INFORMATION				
2.1 Are you claiming the toxic chemical identified on page 2 as a trade secret? <input type="checkbox"/> Yes (Answer question 2.2; attach substantiation forms)		<input type="checkbox"/> No (Do not answer 2.2; go to Section 3)		2.2 Is this copy <input type="checkbox"/> Sanitized <input type="checkbox"/> Unsanitized (Answer only if "Yes" in 2.1)
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: _____
SECTION 4. FACILITY IDENTIFICATION				
Facility or Establishment Name _____		TRI Facility ID Number _____		
4.1 Physical Street Address _____		Mailing Address (if different from physical street address) _____		
City/Country/Tribe/State/ZIP Code _____		City/State/ZIP Code _____		Country (Non-US) _____
4.2 This report contains information for: (Important: Check a or b; check c or d if applicable)				
4.3 Technical Contact Name _____		Telephone Number (include area code and ext.) _____		
Email Address _____		4.4 Public Contact Name _____		
Telephone Number (include area code and ext.) _____		Email Address _____		
4.5 NAICS Code(s) (6 digits) Primary _____		a. _____ b. _____ c. _____ d. _____ e. _____ f. _____		
4.6 Dun & Bradstreet Number(s) (9 digits) a. _____		b. _____		
SECTION 5. Parent Company Information				
5.1 Name of U.S. Parent Company (for TRI Reporting purposes) _____		No U.S. Parent Company (for TRI Reporting purposes) <input type="checkbox"/>		
5.2 Parent Company's Dun & Bradstreet Number _____		NA <input type="checkbox"/>		

EPA form 9350-1 (Rev 06/2014) – Previous editions are obsolete.