



## EPA Proposes Expansion of TRI Reporting to Natural Gas Processing Facilities

On January 6, 2017, the Environmental Protection Agency (EPA) proposed a new rule that would add Natural Gas Processing (NGP) facilities to the list of industry sectors covered by the reporting requirements of Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA), otherwise known as the Toxics Release Inventory (TRI). EPA estimates that a majority of Natural Gas Processing (NGP) facilities meet the TRI employee threshold (10 full-time employees or equivalent) and manufacture, process, or otherwise use TRI listed chemicals such as benzene, xylene, toluene, n-hexane, hydrogen sulfide, and methanol. Historically, most NGP facilities categorized under Standard Industrial Classification (SIC) code 1321 and North American Industry Classification System (NAICS) code

211112 were excluded from the list of industry sectors covered under the TRI rules. Certain NGP facilities that engage primarily in sulfur recovery from natural gas were already subject to the TRI reporting rules. EPA is accepting comments on the proposed rule through March 7, 2017. A copy of the Federal Register notice can be found [here](#).

The TRI reporting rules require affected facilities perform a threshold evaluation each year to determine if TRI reportable chemicals present on site are manufactured, processed, or otherwise used in quantities that exceed the reporting thresholds. If a reporting threshold is exceeded for a TRI reportable chemical, facilities are required to submit either Form A or Form R reports that include fugitive and point source

air emissions, surface water releases, and the amount of TRI reportable chemicals released off-site for disposal or treatment. The TRI reports are required annually by July 1st for reportable chemicals that exceed the reporting threshold.

If finalized, the expansion of this rule will establish significant new annual reporting requirement for NGP facilities. Trihydro's team of experts is available to assist you in evaluating this proposed rule.

## Questions? Please contact our experts:



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