United States
Environmental Protection
Agency

Office of Toxic
Substances (TS-779)
Washington, D.C. 20460

Revised January 1991
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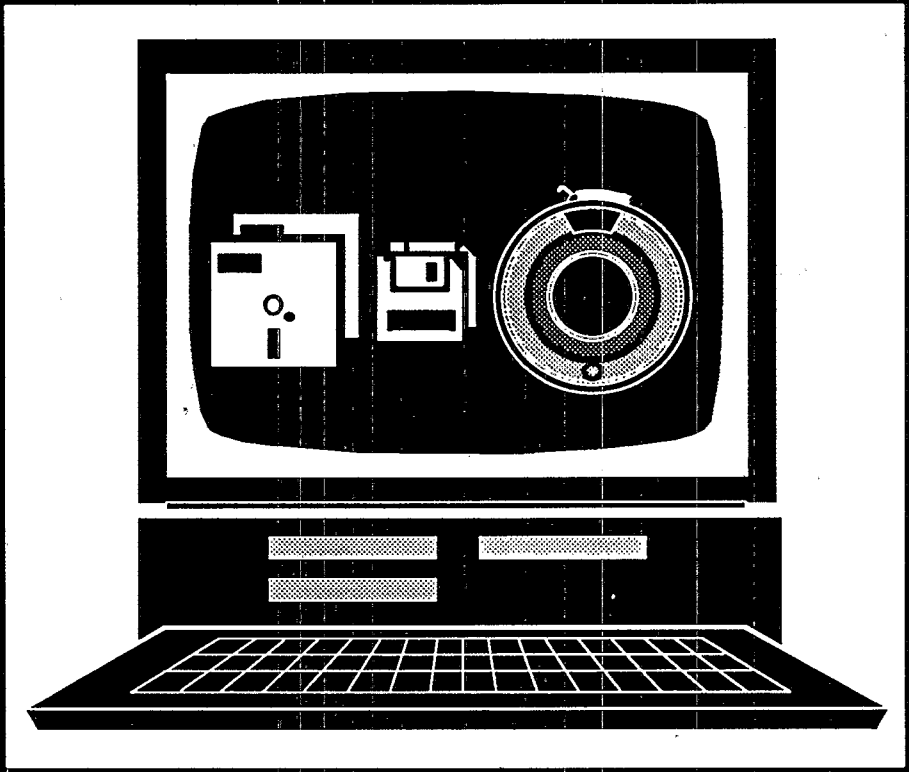
EPA

Toxic Chemical Release Inventory Magnetic Media Submission Instructions

Revised 1990 Version



Section 313
of the Emergency Planning and Community Right-to-Know Act
(Title III of the Superfund Amendments and Reauthorization Act of 1986)

MAGNETIC MEDIA REPORT SPECIFICATIONS FOR THE TOXIC RELEASE INVENTORY SYSTEM (TRIS)

This document provides basic specifications for the use of magnetic media to submit EPA Form R reports required by section 313 of the Emergency Planning and Community Right-to-Know Act (Title III of the Superfund Amendments and Reauthorization Act of 1986), Public Law 99-499. The use of magnetic media can be a convenient and timesaving way to submit required information. The specifications and requirements presented in this document supplement the reporting requirements presented in the section 313 final rule (40 CFR Part 372). **Submission of magnetic media reports does not relieve the submitter from any of the regulatory requirements of the section 313 final rule.**

Special Note -- Availability of Commercial Software Packages.
Several independent software firms are marketing computer systems to assist facilities in meeting their reporting requirements under section 313. Their software products may be designed to produce reports on magnetic media in the format specified in this document. EPA's Office of Toxic Substances, Information Management Division will validate magnetic media formats produced by software packages upon the request of the vendors. Facilities should be cautious and select a software package that will produce a valid format. To obtain up to date information concerning the software packages which EPA recognizes as preparing valid magnetic media formats, contact the Emergency Planning and Community Right-to-Know Information Hotline, U.S. EPA, at (800) 535-0202 or (703) 920-9877.

A complete Form R report contains information on the release of one toxic chemical or chemical category listed in the section 313 final rule. There is no maximum or minimum number of reports that may be submitted on magnetic media for each reporting facility.

In many cases, magnetic media can be submitted in lieu of the hard copy Form R. While the rule allows the specific identity of chemicals to be claimed trade secret, however, **you may not use magnetic media for submissions in which chemical identity is claimed trade secret.** In addition, reporting of corrections to previously submitted section 313 data may not be made through magnetic media.

For detailed instructions concerning reporting requirements, calculation of thresholds and releases, and assembly of required data, see the Toxic Chemical Release Inventory Reporting Form R and Instructions, document number EPA 560/4-91-007, revised January 1991. The instruction document is also contained in the Toxic Chemical Release Inventory Reporting Package, document number EPA 560/4-91-001. For more information on section 313, contact the Emergency Planning and Community Right-to-Know Information Hotline, U.S. EPA, at (800) 535-0202 or (703) 920-9877.

States are not required to accept reports submitted on magnetic media. **Reporting of section 313 information to state agencies on magnetic media must be discussed with, and authorized by, the state involved.** For more information consult the appropriate state contact listed in an appendix of the Toxic Chemical Release Inventory Reporting Form R and Instructions.

Note that these instructions do not apply to the Title III reporting requirements under sections 311 and 312.

Please note that written instructions for completing Form R must be complied with and that the instructions for filing the Form R electronically do not supersede the instructions for completing a hardcopy form. This is particularly true when it comes to reporting "NA" where there is no information to report. Specific changes in the magnetic media format since the January 1990 version of this document (for 1989 reporting) are shown below:

- Total Release Reporting Range codes (A, B, C, or NA) remain the same but their meaning changes.

  A for 1-10 pounds
  B for 11-499 pounds
  C for 500-999 pounds

- Waste minimization "R" codes (R1 R2 R3 R4 R5) remain the same but their meaning changes.

  R1 Regulatory Requirement for the Waste
  R2 Reduction of Treatment/Disposal Costs
  R3 Other Process Cost Reduction
  R4 Discontinuation of Product
  R5 Other (e.g., occupational safety concerns, etc.)

  In addition, a responder may attach an explanation to Form R elaborating on "other reasons."

- Three fields are added to Record Type TR (Trailer), contained in Diskette File TRITR and on tape.

Sequence Number	Field Name	Start	End	Length	Type	Format Notes
Record Type TR (Trailer), contained in Diskette File TRITR.						
1	Record type	1	2	2	Char	Enter tr
2	Number of Submissions	3	7	5	Num	Total number of submissions on diskette package
3	Vendor	8	37	30	Char	Package vendor
4	Version	38	40	3	Char	Package version
5	Report Year	41	44	4	Char	Reporting year for which package was developed

- The end position for the TRI Facility I.D. number in file TRI02 was listed as column 355 but has been changed to 354.

- The start position for the POTW zip code in file TRI08 was listed as column 181 but has been changed to 182.

- Numeric fields are right justified with leading zeros. A 'NA' entry in a numeric field is left justified.

- All alphabetic fields are left justified.

- Numeric linking codes (i.e., POTW code, Offsite code) are right justified with leading zeros.

- Alphabetic linking codes (i.e., Stream codes) are left justified and upper case.

- Format notes change from "Y, N, or NA" to "Y or N" for Diskette file TRI02 Records 8-20, Diskette file TRI09 Record 13, and Diskette file TRI14 Records 6 and 8.

Note: **This document reflects only the changes in the reporting requirements that affect the submission of reports on magnetic media.** Review the instructions to Form R to identify additional changes in the reporting requirements that do not directly affect the format of magnetic media submissions (e.g., chemicals being delisted).

1. CONTENT OF MAGNETIC MEDIA REPORTS - GENERAL SPECIFICATIONS

Reports may be made to EPA using either 9 track magnetic tape or microcomputer diskettes formatted in DOS 2.1 or higher from an IBM PC/XT/AT or compatible microcomputer. File format specifications are substantially different for these two types of media. Data structures and magnetic media must conform to the formats specified in Part 3 of this document.

EPA will make every effort to process the magnetic media received. If the media cannot be read, the tapes or diskettes will be returned to the submitter, who will be held responsible for providing readable media within 30 days. A facility that has not provided readable media before the July 1 deadline will be considered in non-compliance status until EPA receives either readable media or complete Form R reports. EPA strongly encourages facilities to read the information that is contained on the tapes or diskettes before they are submitted to assure data accessibility and avoid non-compliance. Non-readable media will be returned via the required return packaging and pre-paid postage provided by the submitter. All readable media received will become the property of EPA.

Any number of multiple reports from a single facility or reports from multiple facilities may be included on a single tape or diskette. However, individual reports for a facility should be completely contained on a single tape. Diskette files should be completely contained on a single diskette.

Reporting on magnetic media is in lieu of reporting on the hard copy Form R, however, this does not affect the requirement to maintain a record of all information used to complete the reports. This information must be maintained in a form available for review by EPA or state officials for a period of three years from the date of submission.

Exhibit 1, on the following page, is a checklist for submission of magnetic media reports.

== Exhibit 1. MAGNETIC MEDIA PACKAGE CHECKLIST FOR SUBMITTING MEDIA TO EPA ==

A magnetic media package is complete only after you perform the following steps. Use this checklist as an aid to preparing your magnetic media package.

☐ 1. Prepare a cover letter which includes all the required information as well as an original signature for each facility reporting on the magnetic media. (See Part 2.1 of this document.)

☐ 2. Prepare an additional cover page listing all facilities in the order in which they appear on the magnetic media, if your package includes reports from multiple facilities. (See Part 2.2 of this document.)

☐ 3. Verify that the data have been formatted and transferred to magnetic media as specified in this document. (See Parts 3 and 4 of this document.)

☐ 4. Confirm there are no reports for a chemical whose identity is claimed as a trade secret. **No trade secret information may be submitted on magnetic media.**

☐ 5. Confirm that your reports contain all required information. (See the Toxic Chemical Release Inventory Reporting Form R and Instructions, available from EPA.)

☐ 6. Verify that all the reported information is correct to the best of your knowledge.

☐ 7. Perform a data dump or otherwise access the data contained on the magnetic media to confirm that the data is readable from the copy which is to be sent to EPA.

☐ 8. Label the media properly. (See Part 5.1 of this document.)

☐ 9. Package the media safely and include return packaging and postage, the cover letter(s), and cover page (if applicable) in the package with the magnetic media. (See Part 5.2 of this document.) Return packaging and postage allow EPA to return unreadable media.

☐ 10. Mail the package to <u>EPCRA Reporting Center</u>.

For general mailing:
P.O. Box 23779
Washington, D.C. 20026-3779
Attn: Toxic Chemical Release Inventory
Magnetic Media Submission

For certified mail:
470 L'Enfant Plaza East
Suite 7103, SW
Washington, DC 20024
Attn: Toxic Chemical
Release Inventory
Magnetic Media Sub.

2. COVER LETTER AND CERTIFICATION

2.1 Single Facility Packages

Each facility that provides reports on magnetic media must enclose a cover letter containing the following information:

1. Full name and address of the submitting facility;

2. TRI Facility Identification Number;

3. Number of tapes or diskettes enclosed;

4. List of chemical (or chemical category) names and CAS numbers covered by the report;

5. Name and phone number of a data processing contact person who is available to provide clarification;

6. A statement that the information that you are submitting does not contain any trade secret data.

7. Certification statement identical to the certification statement from EPA Form R. (See example in Exhibit 1 of this document.) As required by the regulation, this certification statement must be signed by the owner or operator or a senior management official, not the data processing contact. The signed name must also be typed, followed by the official title of the signee. The date on which the statement was signed must also be on the letter.

8. Specification of the page number of the cover letter in the following format: "Page 1 of N Pages."

The certification provided in the cover letter is the same certification statement contained on reporting Form R. The certification will apply to all reports provided by the facility which are identified by chemical name in the cover letter. The name of the owner/operator or senior management official contained on the cover letter must match the name provided in the data field for Section 2 of Part I of the form (Certification Name and Official Title) in each of the facility's reports contained on the magnetic media.

Exhibit 2 is a sample cover letter that includes each of the required elements.

Exhibit 2. SAMPLE COVER LETTER ACCOMPANYING A MAGNETIC MEDIA PACKAGE

Page 1 of 1 Pages.

Pirx-Lewis, Incorporated
Battery Products Division
10545 Cerillas Road
Albuquerque, N.M. 81103-0420
TRI Fac. ID #81103PRXLWCERIL
May 2, 1991

EPCRA Reporting Center
P.O. Box 23779
Washington, D.C. 20026-3779
Attn: Toxic Chemical Release Inventory
Magnetic Media Submission

To Whom It May Concern:

Enclosed please find two (2) microcomputer diskettes (numbers 1 and 2) containing toxic chemical release reporting information for Pirx-Lewis, Inc., Battery Products Division, as required under section 313, Title III of the Superfund Amendments and Reauthorization Act of 1986.

A total of two (2) reports are included from our facility, concerning the following chemicals:

Chemical Name	Report Number	CAS Number
Lead compounds	00001	NA
Zinc	00002	7440-66-6

Our data processing contact is Jeffrey Mills, who can be reached at (505) 752-5369. Mr. Mills is available should any questions or problems arise in your processing of these diskettes.

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.

Sincerely yours,

Stanley L. Pirx

Stanley L. Pirx, III
Vice President
Battery Products Division
Pirx-Lewis, Incorporated

Enclosures

2.2 Multiple Facility Packages

When multiple facilities provide reports on a single magnetic media, each facility must prepare a separate cover letter containing each of the required elements noted in Section 2.1 of this document. An additional cover page must also be enclosed which lists the names of the facilities in the order in which they appear on the media. Pages should be numbered sequentially starting with the cover page and continuing through all of the cover letters.

A sample of a multiple facility cover page is included as Exhibit 3.

Exhibit 3. SAMPLE COVER PAGE FOR MULTIPLE FACILITIES REPORTING IN A SINGLE MAGNETIC MEDIA PACKAGE

Page 1 of 3 Pages.

American Manufacturing, Inc.
Corporate Headquarters
2625 McDowell Road
Phoenix, AZ 85008
TRI Fac. ID #85008MRCNMMCDOW
May 8, 1991

EPCRA Reporting Center
P.O. Box 23779
Washington, D.C. 20026-3779
Attn: Toxic Chemical Release Inventory
Magnetic Media Submission

To Whom It May Concern:

Enclosed please find a total of two (2) 3.5 inch microcomputer diskettes containing toxic chemical release reporting information required under section 313, Title III of the Superfund Amendments and Reauthorization Act of 1986.

Please also find attached a total of two (2) cover letters, one for each of our subsidiaries that is reporting. The letters include certification statements from each of these facilities and the signatures of senior management officials responsible for reporting. The report data is arranged on the two diskettes in the following order:

1. Pirx-Lewis Incorporated, Battery Products Division (2 reports)
2. Larson Plastics (1 report)

Our data processing contact is John Berg, who can be reached at (602) 258-1234. Mr. Berg is available should any questions or problems arise in your processing of these diskettes.

Sincerely,

Michael J. Noonan

Michael J. Noonan
Vice President, Operations
American Manufacturing, Inc.

Enclosures

3. FORMAT OF MAGNETIC TAPE REPORTS

3.1 Technical Specifications and Structural Records

The following technical requirements apply for magnetic tape reports:

- Density and recording technique: 9-Track, 1600 BPI, odd parity.
- Logical record length (for all record types): 500 Bytes.
- Blocksize: 2000 Bytes.
- Record format: Fixed Blocked (FB).
- Character Type: 7 Bit ASCII.
- Label Type: No Label (NL) with no leading tape mark.
- File Name: TRIDATA.DAT.

As previously described in this document, a Form R report contains information on releases of one chemical or chemical category. All reports for all the facilities reporting on any one tape must be in a single data file that is entirely contained on that tape. **The data file must not span multiple tapes.** If several facilities are reporting on separate tapes which are included in a single package, each facility's reports should be numbered sequentially on their respective tapes, beginning with report number one.

The file itself is made up of records, some of which contain Form R information (described in Part 3.2 of this document) and others which contain information on the data (structural records). Each record has a fixed length of 500 bytes, some of which are used by the current data fields and some reserved for future use. All data are to exist as unquoted, fixed field ASCII format, and should not include commas, control characters, or other delimiters.

Structural records contain specific data on the number of records, reports, and facilities contained on the tape. There are four types of structural records required in tape reporting, as follows:

1. Header (type hh) is the first record of the data file TRIDATA.DAT.
2. Report start (type ss), which is located at beginning of each report.
3. Report end (type se), which is located at the end of each report.
4. Trailer (type tr) is the last record of the data file TRIDATA.DAT.

The field layout for these four record types is shown in Table 1. All four record types are required for magnetic tapes, regardless of the number of facilities reporting on the tape. All information on the tape should be in a single file named TRIDATA.DAT.

Table 1

STRUCTURAL RECORD SPECIFICATIONS FOR FORM R DATA REPORTS ON TAPE

Sequence Number	Field Name	Byte Position Start	Byte Position End	Total Length	Type	Format Notes
Record Type HH (Header Record)						
1	Record Type	1	2	2	Char	Enter hh
2	BLANK	3	7	5	Char	Leave blank
Record Type SS (Report Start)						
1	Record Type	1	2	2	Char	Enter se
2	Report Number	3	7	5	Num	Sequential report number, right justified with leading zeros
Record Type SE (Report End)						
1	Record Type	1	2	2	Char	Enter ss
2	Report Number	3	7	5	Num	Sequential report number, right justified with leading zeros
3	Number of Records	8	12	5	Num	Total number of type 01-14 records in report, right justified with leading zeros
Record Type TR (Trailer)						
1	Record Type	1	2	2	Char	Enter tr
2	Number of Submissions	3	7	5	Num	Total number of submissions on tape, right justified with leading zeros
3	Vendor	8	37	30	Char	Package vendor
4	Version	38	40	3	Char	Package version
5	Report Year	41	44	4	Char	Reporting year for which package was developed

3.2 Structure of Data Records for Tapes

Table 3 specifies the data structure of each of the data record types and relates to the information requested in the individual sections and blanks of EPA Form R. Each data element is contained in a data record of a predefined record type (numbered 01 through 14). The record type is identified by the first two byte positions of the record. The report number is a sequential number assigned by the submitting facility to each report contained on the magnetic media and is used to cross reference the records of a report. [Note: Reports from multiple facilities on a single media must be numbered sequentially and uniquely throughout the media. Therefore, no two reports on the same tape will have the same report number, whether the reports originate from the same or different facilities.]

The start byte, end byte, and total length of each data field has been defined as shown in Table 3. Blank data fields will be represented by blank bytes on the report media and should not be considered to be the same as data fields filled by NA, which is used to designate data not applicable to the submitting facility. (See the Form R instructions for further clarification.)

Table 3 also provides information on data formats including the right or left justification and the pre-defined placement of decimal points (e.g., a left justified 3 will be read as 300,000,000 in a 9 byte field). Percent data should be reported to the nearest whole number. For example, 05300 will be read as 53 percent, and although 00053 would be read as 0.53 percent, 1 percent (i.e., 00100) should be reported).

Exhibit 4 presents a sample data structure for a magnetic tape record prepared by a facility which conforms to the data structure specified in Table 3. Exhibit 5 illustrates how the four structural records described in Part 3.1 of this document and the records which contain Form R data should be ordered on the tape package.

==========Exhibit 4. EXAMPLE DATA STRUCTURE FOR MAGNETIC TAPE REPORTS==========

Bell Products is completing Record Type 10 for its first report. Bell has two receiving streams for this report, and so will have two Type 10 records. The following format is used for Bell's data:

Data Stream		Explanation
1000001ab	nam 10000	Type 10 record for a release to water; 10 is the record type; 00001 is the report number; "a" is the alphabetical index assigned to the receiving stream; "b" is the range code; "na" is the estimate; "m" is the basis of estimate code for monitoring data; 10000 corresponds to a stormwater percentage of 100%
1000001bna00000000150o	05100	A second type 10 record, for a second receiving stream (assigned index "b") which is estimated to receive 150 pounds of the chemical with stormwater percentage 51%.

==========Exhibit 5. EXAMPLE OF RECORD ORDER FOR TAPE REPORTS==========

Gates Photographic Supply is reporting for two of its facilities on one tape. Gates has two reports for its first facility and one report for its second facility. All of this information should be contained in a single file named "TRIDATA.DAT". Gates should structure its data stream as shown below:

Record Type	Explanation
hh	Header record for tape.
ss	Report start record for report 1 in facility 1; this report is assigned report number 00001.
01 to 14	Record types 01 through 14 for report 1 go here. They contain Form R data for the first report as defined in Table 3
se	Report end record for report 1. This record contains a field which indicates the number of Form R type records in the first report. (The number can vary, depending on the number of multiple records in the report; see above example)
ss	Report start record for report 2 in facility 1; this report is assigned report number 00002.
01 to 14	Record types 01 through 14 for report 2.
se	Report end record for report 2. This record contains a field which indicates the number of Form R type records in the second report.
ss	Report start record for the first report from facility 2. Because this is the third report on the tape, it is assigned report number 00003, to avoid its confusion with the first report from facility 1.
01 to 14	Record types 01 through 14 for this report.
se	Report end record for this report.
tr	Trailer record for this tape. This record has a field which indicates the total number of submissions from all facilities on the tape.

4. MICROCOMPUTER DISKETTE REPORTS

4.1 Technical Specifications and Special Files

Diskettes may be either 5.25 inch or 3.5 inch in size and either double density or high density in data capacity. They must be formatted using DOS 2.1 or higher, on an IBM PC/XT/AT or compatible, as follows:

Size	Double density	High density
5.25"	360 Kbytes	1.2 Mbytes
3.5"	720 Kbytes	1.4 Mbytes

All diskettes contained in a single package must be of a single type and format, and must be properly labeled with the format used.

For diskette submissions, records of different types must be contained in separate files. These files are named with a combination of the letters "TRI" and the record type (e.g., type 08 records will be in the file "TRI08."). Multiple records of the same type which are part of a single report, as well as all records of the same type provided for all other reports in the package, must be contained in a single file. Files containing records of a type should be completely contained on a single floppy diskette which has been properly labeled to identify the files it holds.

Two additional files must be created to contain information on the numbers of records and reports provided in the diskette package. They are:

1. Report end records (type se), created to identify the number of records in each report that is included in the diskette package. These are placed in a data file named "TRISE.".

2. Trailer records (type tr), created to identify the total number of submissions being provided by all facilities which are reporting on the diskettes. These are placed in a data file named "TRITR.".

The structure for these record types is shown in Table 2 on the following page.

It is very important that each report have a unique report number used throughout the records pertaining to that report. Report numbers may be assigned in any order, so long as no two reports share the same number.

Table 2

STRUCTURAL RECORD SPECIFICATIONS FOR FORM R DATA REPORTS ON DISKETTE

Sequence Number	Field Name	Byte Position Start	Byte Position End	Total Length	Type	Format Notes
Record Type SE (Report End), contained in Diskette File TRISE.						
1	Record Type	1	2	2	Char	Enter se
2	Report Number	3	7	5	Num	Sequential report number, right justified with leading zeros
3	Number of Records	8	12	5	Num	Total number of type 01-14 records in report, right justified with leading zeros
Record Type TR (Trailer), contained in Diskette File TRITR.						
1	Record Type	1	2	2	Char	Enter tr
2	Number of Submissions	3	7	5	Num	Total number of submissions on diskette package, right justified with leading zeros
3	Vendor	8	37	30	Char	Package vendor
4	Version	38	40	3	Char	Package version
5	Report Year	41	44	4	Char	Reporting year for which package was developed

4.2 Structure of Form R Data Records for Diskettes

Each record has a fixed length of 500 bytes, some of which are used by the current data fields, some reserved for future use, and some reserved for a carriage return and line feed (positions 499 and 500 respectively). All data are to exist as unquoted, fixed field ASCII format, and should not include commas, control characters, or other delimiters.

Table 3 specifies the data structure of each of these records and relates the data to the individual sections and blanks of EPA Form R. Each data element is contained in a record of a predefined record type (numbered 01 through 14). The record type is identified by the first two byte positions of the record. The report number is a sequential number assigned by the submitting facility to each report contained on the magnetic media and is used to cross reference the records of a report. Multiple entries of facility data (e.g., SIC code, NPDES permit numbers) should be contained in multiple records of the type that is appropriate for that data. For example, a facility with two SIC codes would have two records of type 03. [Note: Reports from all facilities on a single media must be numbered sequentially and uniquely throughout the media. Therefore, no two reports on the same diskette will have the same report number, whether the reports originate from the same or different facilities.]

The start byte, end byte, and total length of each data field has been defined as shown in Table 3. Blank data fields will be represented by blank bytes on the report media and should not be considered to be the same as data fields filled by NA, which is used to designate data not applicable to the submitting facility. (See the instructions for completing Form R for further clarification.)

Table 3 also provides information on data formats including the right or left justification and the pre-defined placement of decimal points (e.g., a left justified 3 will be read as 300,000,000 in a 9 byte field). Percent data should be reported to the nearest whole number. For example, 05300 will be read as 53 percent, and although 00053 would be read as 0.53 percent, 1 percent (i.e., 00100) should be reported).

An example of how a company might prepare diskette files for Form R reporting is contained in Exhibit 6.

===== Exhibit 6. EXAMPLE FILE AND DATA STRUCTURE FOR DISKETTE REPORTING =====

American Manufacturing is preparing reports for two of its facilities and submitting reports on diskettes. The facilities are assigned facility numbers 00001 and 00002. There are a total of three reports from the two facilities combined. American Manufacturing assigns report numbers 00001 and 00002 to the two reports from the first facility, and report number 00003 to the second facility's report, so that each report will have a unique report number.

After consulting the Toxic Chemical Release Inventory Reporting Form R and Instructions to assemble the information it needs, American Manufacturing can proceed to Table 3 to determine how this information should be entered on the diskettes.

The first diskette contains files TRI03 and TRI07, both containing Form R data, and files TRISE and TRITR. Facility 1 has an SIC code of 3691, and facility 2 has an SIC code of 4567. Table 3 of this document describes the data structure of record type 03. The record's first two byte positions contain the record type, the next 5 byte positions contain the report number, and the last four contain the facility SIC code. American Manufacturing must prepare three records for this file, one record for each report it is completing, and store all three in file TRI03. File TRI03 contains the following formatted data:

```
03000013691
03000023691
03000034567
```

To prepare file TRI07 American Manufacturing must determine how many receiving streams each report names. The first report names two receiving streams, and the other two reports name one receiving stream each; American Manufacturing must report a total of four receiving streams. After determining the structure of record type 07 from Table 3 of this report, American Manufacturing stores the following information in file TRI07 [Note: For report number 00001, with two receiving streams named, the first, "tijeros arroyo", is assigned alphabetical stream code "A", and the second, "rio grande", is assigned stream code "B". The other reports (00002 and 00003), assign stream code "A" to the only stream that they contain.]:

```
0700001Atijeros arroyo
0700001Brio grande
0700002Ario grande
0700003Asanta cruz river
```

After completing the other records for the reports, American Manufacturing finds a total of 18 records for report 00001, 21 records for report 00002, and 14 records for report 00003. [Note: The count of records includes record types 01 to 14 only. It does not include the number of records of types se or tr.] File TRISE contains the following end of report records:

```
se0000100018
se0000200021
se0000300014
```

Record type tr contains the number of submissions in the diskette package, therefore file TRITR contains the following formatted data:

```
tr00003
```

Table 3

DATA RECORD STRUCTURAL SPECIFICATIONS FOR FORM R DATA

Sequence Number	Reference to Reporting Form R: Page	Sect.	Title/Topic	Byte Position: Start	End	Total Length	Type	Format Notes
Record Type 01 (Diskette file TRI01)								
1			Record type	1	2	2	Char	Enter 01
2			Report number	3	7	5	Num	Sequential number, right justified, leading zeros
3	1	1.1	Trade secret	8	8	1	Char	Enter N[a]
4	1	1.2	Sanitized copy	9	10	2	Char	Enter NA[a]
5	1	1.3	Reporting year	11	14	4	Char	Enter reporting year (e.g., 1990)
6	1	2	Certification name	15	59	45	Char	Left justified
7	1	2	Certification title	60	104	45	Char	Left justified
8	1	2	Certification date	105	110	6	Char	Date format MMDDYY[b]
9	1	3.1	Facility name (1st part)	111	140	30	Char	Left justified[c]
10	1	3.1	Facility name (2nd part)	141	170	30	Char	Left justified[c]
11	1	3.1	Facility st. (1st part)	171	200	30	Char	Left justified[c]
12	1	3.1	Facility st. (2nd part)	201	230	30	Char	Left justified[c]
13	1	3.1	Facility city	231	255	25	Char	Left justified
14	1	3.1	Facility county	256	280	25	Char	Left justified
15	1	3.1	Facility state	281	282	2	Char	Left justified
16	1	3.1	Facility zip	283	291	9	Char	Left justified, no dashes
17	1	3.2	Entire/part facility	292	292	1	Char	Enter A (entire) or B (part)
18	1	3.3	Technical contact name	293	337	45	Char	Left justified
19	1	3.3	Technical contact phone	338	347	10	Char	Includes area code[d]
20	1	3.4	Public contact name	348	392	45	Char	Left justified
21	1	3.4	Public contact phone	393	402	10	Char	Includes area code[d]
22	1	3.6	Facility latitude	403	409	7	Char	Format DDDMMSS[e]
23	1	3.6	Facility longitude	410	416	7	Char	Format DDDMMSS[e]
24	1	3.11	1st UIC ident. number	417	428	12	Char	Right justified with leading zeros
25	1	3.11	2nd UIC ident. number	429	440	12	Char	Right justified with leading zeros
26	1	4.1	Parent company name	441	485	45	Char	Left justified
27	1	4.2	Parent company D&B num.	486	494	9	Char	Right just., no dashes, leading zeros

[a] This is the only acceptable value for the field, because no trade secret data may be submitted on magnetic media.

[b] e.g., March 17, 1991, would be entered as "031791".

[c] Two fields are provided to allow ample room to report this information.

[d] Do not include parentheses or dashes, e.g., (202) 555-1212 would be entered as "2025551212".

[e] e.g., 91 degrees, 15 minutes, 5 seconds would be entered as "0911505". North latitude and west longitude are assumed.

Table 3: DATA RECORD STRUCTURAL SPECIFICATIONS FOR FORM R DATA (Cont'd)

Sequence Number	Reference to Reporting Form R: Page	Sect.	Title/Topic	Byte Position: Start	End	Total Length	Type	Format Notes
Record Type 02 (Diskette file TRI02)								
1			Record type	1	2	2	Char	Enter 02
2			Report number	3	7	5	Num	Sequential number, right just., leading zeros
3	3	1.1	RESERVED	8	8	1	Char	Leave Blank
4	3	1.2	CAS number	9	17	9	Char	Right justified with leading zeros[a], or NA[d]
5	3	1.3	Chemical/category name	18	87	70	Char	Left justify or NA
6	3	1.4	Generic name	88	157	70	Char	Not applicable for non-trade secret reports, left justified
7	3	2	Mixture component name	158	227	70	Char	Left justify or NA
8	3	3.1	M:(a) Produce	228	229	2	Char	Enter Y or N, left justified
9	3	3.1	M:(b) Import	230	231	2	Char	Enter Y or N, left justified
10	3	3.1	M:(c) On-site use	232	233	2	Char	Enter Y or N, left justified
11	3	3.1	M:(d) Sale/distrib.	234	235	2	Char	Enter Y or N, left justified
12	3	3.1	M:(e) Byproduct	236	237	2	Char	Enter Y or N, left justified
13	3	3.1	M:(f) Impurity	238	239	2	Char	Enter Y or N, left justified
14	3	3.2	P:(a) Reactant	240	241	2	Char	Enter Y or N, left justified
15	3	3.2	P:(b) Formulatn. comp.	242	243	2	Char	Enter Y or N, left justified
16	3	3.2	P:(c) Article comp.	244	245	2	Char	Enter Y or N, left justified
17	3	3.2	P:(d) Repackaging only	246	247	2	Char	Enter Y or N, left justified
18	3	3.3	OU: (a) Chem. process	248	249	2	Char	Enter Y or N, left justified
19	3	3.3	OU: (b) Manufact. aid	250	251	2	Char	Enter Y or N, left justified
20	3	3.3	OU: (c) Ancillary/Other	252	253	2	Char	Enter Y or N, left justified
21	3	4	Maximum amount on site	254	255	2	Char	Enter amount range code (01 through 11)
22	3	5.1	F/Air: Range code	256	257	2	Char	Enter range code (A through C)[b] or NA, left just.
23	3	5.1	F/Air: Release est.	258	268	11	Char	Right justify num. (no decimal places) with leading zeros or NA[d]
24	3	5.1	F/Air: Basis of est.	269	270	2	Char	Basis code (M, C, E, or O) or NA, left just.
25	3	5.2	S/Air: Range code	271	272	2	Char	Range code (A through C)[b] or NA, left justified
26	3	5.2	S/Air: Release est.	273	283	11	Char	Right justify num. (no decimal places) with leading zeros or NA[d]
27	3	5.2	S/Air: Basis of est.	284	285	2	Char	Basis code (M, C, E, or O) or NA, left just.
28	3	5.4	UI: Range code	286	287	2	Char	Range code (A through C)[b] or NA, left justified
29	3	5.4	UI: Release estimate	288	298	11	Char	Right justify num. (no decimal places) with leading zeros or NA[d]
30	3	5.4	UI: Basis of estimate	299	300	2	Char	Basis code (M, C, E, or O) or NA, left just.
31	4	8.A	Waste min. code	301	302	2	Char	Type of modification code (M1 through M8) or NA
32	4	8.B	Current yr. chem. qty.	303	315	13	Char	Right justify num. with leading zeros or NA[d]
33	4	8.B	Prior year chem. qty.	316	328	13	Char	Right justify num. with leading zeros or NA[d]
34	4	8.B	Percentage change	329	333	5	Char	Right just. percent (no decimal point)[c] or NA[d]
35	4	8.B	Percent change sign	334	334	1	Char	Enter P (positive) or N (negative)
36	4	8.C	Index	335	336	2	Char	Right just., no decimal point (99=9.9), or NA[d]
37	4	8.C	Index sign	337	337	1	Char	Enter P (positive) or N (negative)
38	4	8.D	Reason for action code	338	339	2	Char	Action code (R1 through R5)
39	1	3.1	TRI Facility I.D. num.	340	354	15	Char	Left justified, no dashes[e]

[a] e.g., CAS number 1336-36-3 would be entered as "001336363".

[b] "A" should be entered for 1-10 pounds, "B" for 11-499 pounds, or "C" for 500-999 pounds.

[c] Enter percent without a decimal point, but with two trailing zeros (e.g., 23 percent would be entered as "02300"). Do not include fractions of a percent (i.e., report 23 rather than 23.15).

[d] "NA" entry in numeric field should be left justified.

[e] TRI Facility Identification Number is a new data item for 1989 reports and is assigned by EPA.

Table 3: DATA RECORD STRUCTURAL SPECIFICATIONS FOR FORM R DATA (Cont'd)

Sequence Number	Reference to Reporting Form R: Page	Sect.	Title/Topic	Byte Position: Start	End	Total Length	Type	Format Notes
Record Type 03 (Diskette file TRI03)								
1			Record type	1	2	2	Char	Enter 03
2			Report number	3	7	5	Num	Sequential number, right just., leading zeros
3	1	3.5	SIC code	8	11	4	Char	SIC code
Record Type 04 (Diskette file TRI04)								
1			Record type	1	2	2	Char	Enter 04
2			Report number	3	7	5	Num	Sequential number, right just., leading zeros
3	1	3.7	D&B Number	8	16	9	Char	Right justify, use leading zeros, no dashes
Record Type 05 (Diskette file TRI05)								
1			Record type	1	2	2	Char	Enter 05
2			Report number	3	7	5	Num	Sequential number, right just., leading zeros
3	1	3.8	EPA ID Number	8	19	12	Char	Right justify, use leading zeros, no dashes
Record Type 06 (Diskette file TRI06)								
1			Record type	1	2	2	Char	Enter 06
2			Report number	3	7	5	Num	Sequential number, right just., leading zeros
3	1	3.9	NPDES Permit Number	8	16	9	Char	Right justify with leading zeros
Record Type 07 (Diskette file TRI07)								
1			Record type	1	2	2	Char	Enter 07
2			Report number	3	7	5	Num	Sequential number, right just., leading zeros
3	1	3.10	Receiving Stream Code	8	8	1	Char	Sequential alphabetic character[a]
4	1	3.10	Receiving Stream Name	9	78	70	Char	Left justify
Record Type 08 (Diskette file TRI08)								
1			Record type	1	2	2	Char	Enter 08
2			Report number	3	7	5	Num	Sequential number, right just., leading zeros
3	2	1	POTW Code	8	9	2	Char	Sequential numeric character[b]
4	2	1	POTW Name (1st part)	10	39	30	Char	Left justify[c]
5	2	1	POTW Name (2nd part)	40	69	30	Char	Left justify[c]
6	2	1	POTW Street (1st part)	70	99	30	Char	Left justify[c]
7	2	1	POTW Street (2nd part)	100	129	30	Char	Left justify[c]
8	2	1	POTW City	130	154	25	Char	Left justify
9	2	1	POTW County	155	179	25	Char	Left justify
10	2	1	POTW State	180	181	2	Char	Left justify
11	2	1	POTW Zip	182	190	9	Char	Left justify, no dashes

[a] Each distinct receiving stream must be assigned a distinct alphabetic code (a, b, c, etc.). The code must also be entered in the corresponding location in record type 10 to allow release estimate data to be matched to the receiving location's descriptive information. Left justified and upper case.

[b] POTWs should be assigned distinct sequential numeric codes (1, 2, 3, etc.). The code must also be entered in the corresponding location in record type 12 to allow release estimate data to be matched to the POTW's descriptive information. Right justified with leading zeros.

[c] Two fields are provided to allow ample room to report this information.

Table 3: DATA RECORD STRUCTURAL SPECIFICATIONS FOR FORM R DATA (Cont'd)

Sequence Number	Reference to Reporting Form R Page	Sect.	Title/Topic	Byte Position Start	End	Total Length	Type	Format Notes
Record Type 09 (Diskette file TRI09)								
1			Record type	1	2	2	Char	Enter 09
2			Report number	3	7	5	Num	Sequential number, right justified, leading zeros
3	2	2	Off Site Code	8	9	2	Char	Sequential numeric character[a]
4	2	2	RCRA ID Number	10	21	12	Char	Right justify with leading zeros
5	2	2	Off Site Name (1st part)	22	51	30	Char	Left justify[b]
6	2	2	Off Site Name (2nd part)	52	81	30	Char	Left justify[b]
7	2	2	Off Site St. (1st part)	82	111	30	Char	Left justify[b]
8	2		Off Site St. (2nd part)	112	141	30	Char	Left justify[b]
9	2	2	Off Site City	142	166	25	Char	Left justify
10	2	2	Off Site County	167	191	25	Char	Left justify
11	2	2	Off Site State	192	193	2	Char	Left justify
12	2	2	Off Site Zip	194	202	9	Char	Left justify
13	2	2	Off Site Control Ind.	203	204	2	Char	Enter Y or N, left justified
Record Type 10 (Diskette file TRI10)								
1			Record type	1	2	2	Char	Enter 10
2			Report number	3	7	5	Num	Sequential number, right justified, leading zeros.
3	3/5	5.3	Water: Stream code	8	8	1	Char	Matches Record Type 07, alphabetic character[c]
4	3/5	5.3	Water: Range code	9	10	2	Char	Range code (A through C)[d] or NA, left justified
5	3/5	5.3	Water: Release estimate	11	21	11	Char	Right justify num. (no decimal places) with leading zeros or NA[f]
6	3/5	5.3	Water: Basis of estimate	22	23	2	Char	Basis code (M, C, E, or O) or NA, left justified
7	3/5	5.3	Water: Stormwater percent	24	28	5	Char	Right justify percent (no decimal point)[e] or NA[f]

[a] Off-site transfer points must be assigned distinct numeric codes. The code must also be entered in the corresponding location in record type 13. Right justified with leading zeros.

[b] Two fields are provided to allow ample room to report this information.

[c] The code entered must be an alphabetical character code that matches the code used in record type 07 for the receiving stream. Each receiving stream should have a distinct record type 10. Left justified and upper case.

[d] "A" should be entered for 1-10 pounds, "B" for 11-499 pounds, or "C" for 500-999 pounds.

[e] Enter percent without a decimal point, but with two trailing zeros (e.g., 23 percent would be entered as "02300"). Do not include fractions of a percent (i.e., report 23 rather than 23.15).

"NA" entry in numeric field should be left justified.

Table 3: DATA RECORD STRUCTURAL SPECIFICATIONS FOR FORM R DATA (Cont'd)

Sequence Number	Reference Reporting Form R Page	Sect.	Title/Topic	Byte Position Start	End	Total Length	Type	Format Notes
Record Type 11 (Diskette file TRI11)								
1			Record type	1	2	2	Char	Enter 11
2			Report number	3	7	5	Num	Sequential number, right just., leading zeros
3	3/5	5.5	On-site landfill: Range	8	9	2	Char	Range code (A through C)[a] or NA, left just.
4	3/5	5.5	On-site landfill:Release	10	20	11	Char	Right justify num. (no decimal places) with leading zeros or NA[c]
5	3/5	5.5	On-site landfill: Basis	21	22	2	Char	Basis code (M, C, E, or O) or NA, left just.
6	3/5	5.5	Land treat: Range code	23	24	2	Char	Range code (A through C)[a] or NA, left justified
7	3/5	5.5	Land treat: Release est.	25	35	11	Char	Right justify num. (no decimal places) with leading zeros or NA[c]
8	3/5	5.5	Land treat: Basis of est	36	37	2	Char	Basis code (M, C, E, or O) or NA, left just.
9	3/5	5.5	Surf. Imp: Range code	38	39	2	Char	Range code (A through C)[a] or NA, left justified
10	3/5	5.5	Surf. Imp: Release est.	40	50	11	Char	Right justify num. (no decimal places) with leading zeros or NA[c]
11	3/5	5.5	Surf. Imp: Basis of est.	51	52	2	Char	Basis code (M, C, E, or O) or NA, left just.
12	3/5	5.5	Other land: Range code	53	54	2	Char	Range code (A through C)[a] or NA, left justified
13	3/5	5.5	Other land: Release est.	55	65	11	Char	Right justify num. (no decimal places) with leading zeros or NA[c]
14	3/5	5.5	Other land: Basis of est	66	67	2	Char	Basis code (M, C, E, or O) or NA, left just.
Record Type 12 (Diskette file TRI12)								
1			Record type	1	2	2	Char	Enter 12
2			Report number	3	7	5	Num	Sequential number, right just., leading zeros
3	4/5	6.1	POTW Code	8	9	2	Char	Matches Record Type 08, numeric character[b]
4	4/5	6.1	POTW Range code	10	11	2	Char	Range code (A through C)[a] or NA, left justified
5	4/5	6.1	POTW Release estimate	12	22	11	Char	Right justify num. (no decimal places) with leading zeros or NA[c]
6	4/5	6.1	POTW Basis of estimate	23	24	2	Char	Basis code (M, C, E, or O) or NA, left just.
Record Type 13 (Diskette file TRI13)								
1			Record type	1	2	2	Char	Enter 13
2			Report number	3	7	5	Num	Sequential number, right just., leading zeros
3	4/5	6._	Offsite: Code	8	9	2	Char	Matches Record Type 09, numeric character[b]
4	4/5	6._	Offsite: Range code	10	11	2	Char	Range code (A through C)[a] or NA, left just.
5	4/5	6._	Offsite: Release est.	12	22	11	Char	Right justify num. (no decimal places) with leading zeros or NA[c]
6	4/5	6._	Offsite: Basis of est.	23	24	2	Char	Basis code (M, C, E, or O) or NA, left just.
7	4/5	6._	Offsite: Treatment type	25	27	3	Char	Offsite Treatment code, left justified

[a] "A" should be entered for 1-10 pounds, "B" for 11-499 pounds, or "C" for 500-999 pounds.

[b] The code entered must match the numeric code in record type 08 for the corresponding POTW or record type 09 for the corresponding off-site transfer point. Record types 12 and 13 contain data for the amounts of toxic chemical transferred to each POTW or off-site location; this code cross-references with other records containing descriptive information. Right justified with leading zeros.

[c] "NA" entry in numeric field should be left justified.

Table 3: DATA RECORD STRUCTURAL SPECIFICATIONS FOR FORM R DATA (Cont'd)

Sequence Number	Reference to Reporting Form R: Page	Sect.	Title/Topic	Byte Position: Start	End	Total Length	Type	Format Notes
Record Type 14 (Diskette file TRI14)								
1			Record type	1	2	2	Char	Enter 14
2			Report number	3	7	5	Num	Sequential number, right just., leading zeros
3	4/5	7._a	WTME: Wastestream	8	8	1	Char	Wastestream code
4	4/5	7._b	WTME: Treatment	9	11	3	Char	Treatment code, left justified
5	4/5	7._c	WTME: Influent conc. rng.	12	13	2	Char	Range code (1 through 5)[a] or NA
6	4/5	7._d	WTME: Seq. treatment	14	15	2	Char	Y or N, left justified
7	4/5	7._e	WTME: Efficiency est.	16	20	5	Num	Right justify percent (no decimal point)[b] or NA[c]
8	4/5	7._f	WTME: Based on data	21	22	2	Char	Y or N, left justified

[a] "1" should be entered for > 1 percent, "2" for 0.01 percent to 1 percent, "3" for 1 ppm to 100 ppm, "4" for 1 ppb to 1 ppm, or "5" for < 1 ppb.

[b] Enter percent without a decimal point but with two trailing zeros (e.g., 23 percent would be entered as "02300"). Do not include fractions of a percent (i.e., report 23 rather than 23.15).

[c] "NA" entry in numeric field should be left justified.

5. LABELING AND PACKAGING REQUIREMENTS

5.1 Labeling Requirements

A label must be attached to each tape reel (not tape band) and diskette (not jacket) which conforms to the following format:

TRIS Report					
(A)					
Date	(B)	Density	(C)		
Report Yr.	(D)	Num.	(E)	of	(F)
Contact	(G)				
Files	(H)				

A. Name of the submitting facility (or for multiple facility packages the name of the company which prepared the reports).
B. Date the tape or diskette was created.
C. Floppy diskette format density. Use HD for high density or DD for double density. (Applicable only to diskettes.)
D. Year for which the data are reported.
E. Number of this diskette or tape.
F. Total number of diskettes or tapes in the package.
G. Name and phone number of a facility computer contact person.
H. File name or names on the tape or diskette.

Labels may be typed or legibly handwritten. **Any media submitted without a proper label attached will not be processed and will be returned to the submitter.** Exhibit 7 contains a sample diskette label.

EXHIBIT 7

TRIS Report					
American Manufacturing, Inc.					
Date	5/15/91	Density	DD		
Report Yr.	90	Num.	1	of	2
Contact	John Berg (602)258-1234				
Files	TRI03, TRI07, TRITR, TRISE				

At left is a sample diskette label for American Manufacturing, which has two double density diskettes in its package. The package contains information on two of American's facilities, but the labels should only list the parent company, American Manufacturing, and the data processing contact at American. Diskette 1 contains the files TRI03, TRI07, TRISE, and TRITR.

5.2 Packaging and Shipping Requirements

The type of packaging and method of shipment used for magnetic media are left to the discretion of the submitting facility. EPA accepts no responsibility for packages lost or damaged during transit. It is recommended that the package be marked with the words "Magnetic Media -- Do Not X-Ray".

All magnetic media packages must include self-addressed, postage paid return packaging sufficient to allow EPA to return unreadable media to the facility.

Send complete magnetic media (properly labeled) along with a cover letter (containing an original certification signature from each submitting facility), and cover page (if necessary) to:

EPCRA Reporting Center
P.O. Box 23779
Washington, D.C. 20026-3779
Attn: Toxic Chemical Release Inventory
Magnetic Media Submission

Certified mail and hand-delivered submissions only should be addressed to:

EPCRA Reporting Center
470 L'Enfant Plaza East
Suite 7103, SW
Washington, DC 20024
Attn: Toxic Chemical Release Inventory
Magnetic Media Submission

Reports to the appropriate State agency must be made in accordance with the instructions for completing Form R (see page 1 of this document). A State contact list is provided in the instructions document. However, a State may not have the capability to accept magnetic media as specified in this document. In these cases, you must send copies of Form R to the State. Alternatively, the State may have established a computer database but have different specifications for submission of section 313 data on magnetic media, in which case you should contact the State representative listed in the Toxic Chemical Release Inventory Reporting Package (EPA560/4-91-001) for details.

EPA

United States
Environmental Protection
Agency

Office of Pesticides and
Toxic Substances, TS-779
Washington, DC 20460

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