

March 7, 2003

Keith

Here is one of my members lists of duplicative reporting in the environmental arena:

1. Haz waste shipments on both RCRA biennial and annual SARA TRI (not quite duplicative, but depends on chemical concentration in waste - lbs total v constituent)
>> From whom/ to whom is the same
2. Annual air emission fees (for those states or air districts that require them) and SARA TRI reports - lb for lb for TRI chemicals virtually identical.
3. WW discharges for certain pollutants that are SARA TRI reportable. Although most WW reports are concentration based, some are mass based and getting annual totals is a matter of adding. >> From whom/ to whom is the same.
4. Tier II reports and CA HMBP were duplication until Reg 9 issued July 27, 2001 letter confirming that CA facilities submitting HMBP annual reports did not have to file Tier II reports.
5. Some states duplicate federal TRI reporting with same chemicals. e.g. MA and their form S.
6. Some states require duplication of haz waste quantities for waste min/P2 reports. e.g. NY's HWRP and CA's SB 14.

Fern Abrams
Director of Environmental Policy
IPC - the Association Connecting Electronics Industries
1333 H Street NW, 11th Floor West
Washington, DC 20005
202-962-0460
fax 202 - 962-0464
www.ipc.org