



## FREQUENT QUESTIONS: Form R Part II

05.13.2015

As the July 1 deadline for filing the Form R for your facility approaches, these additional Frequent Questions may assist your preparation.

**Question:** For purposes of Section 313 reporting, is ammonium nitrate in a fuel oil slurry considered in solution and therefore in the physical state reportable under Form R?

**Answer:** No. Ammonium nitrate and fuel oil are commonly used as explosives in the mining industry; ammonium nitrate in solution is the listed toxic chemical form. This mixture does not constitute a "solution" under Form R requirements and is not reportable, because the ammonium nitrate is not dissolved; the ammonium nitrate in fuel oil is in suspension or dispersion.

**Question:** Zinc in a metal bar is ground in a wet process. The resulting slurry contains zinc dust which is released into solution. Is this facility "manufacturing" zinc as fume or dust (the form of zinc reportable under Form R), even though it is released directly into an aqueous solution?

**Answer:** No. Zinc releases need only be reported where the zinc release occurs in the form of fume or dust. EPA guidance indicates the terms "fume or dust" as to zinc refer only to the dry forms of zinc, not the wet forms in solutions or slurries. In reporting releases, only zinc fume or dust should be reported.

**Question:** A manufacturing facility receives toluene containing chlorobenzene at concentrations below its de minimis limit of 1%. Through distillation, the chlorobenzene content in process streams is increased above the de minimis threshold. Is the facility required to account for chlorobenzene in reporting threshold calculations?

**Answer:** Yes. From the point at which the chlorobenzene equals or exceeds 1% in process streams, the amount present must be factored into threshold and release calculations. The facility does not need to consider the amount of chlorobenzene in its raw materials when below 1%, however.

If the concentration of the chlorobenzene fluctuates above and below the de minimis levels, the facility must treat the chemical as reportable from the point it first exceeds the de minimis levels. Once the de minimis limit has been reached, the exemption cannot be taken.

## **Related People**

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## **Related Services**

- Environment & Natural Resources