

# Community Right-To-Know Toxic Release Inventory (TRI)

## 2005 Information Reported 2006

### **What is TRI?**

Congress developed the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) to provide information about certain manufacturing activities to emergency response agencies and the public. Part of EPCRA includes the Toxics Release Inventory (TRI), which requires certain facilities to annually report data on “releases” and management activities for specific chemicals and compounds. In 1997, the Environmental Protection Agency (EPA) expanded its reporting programs to include mine operations such as CC&V’s.

### **What is TRI’s Purpose?**

- Make information available to the public about compounds used and “released.”
- Reduce chances of accidents.
- Encourage education about use and “release” of these compounds.

### **What are the Limitations of TRI Data?**

- TRI data reflect “releases” of compounds, not the risk of exposure of the public to those substances.
- TRI assumes all compounds are liberated during the reporting year, although most mining related “releases” are associated with native rock that requires decades to millennia to weather.
- TRI does not cover all sources of “releases” such as car emissions.

### **What is CC&V Doing?**

- CC&V annually updates the inventory of the listed compounds that are manufactured, processed, or otherwise used to identify those eligible for reporting.
- In compliance with the EPA guidelines, CC&V inventories the compounds, which **naturally** occur in the rocks within its operations area.

### **What is the Nature of the Releases?**

- CC&V’s “releases” include crushed rock that is used for activities such as road construction and blast hole stemming.
- CC&V’s “releases” for arsenic, lead and zinc, include the rock removed and stockpiled to gain access to the ore.
- CC&V’s activities involving the use and “release” of these compounds are in full compliance with existing permits, laws and regulations.

## **2005 “Releases”**

<b>TRI Chemical</b>	<b>Release in Pounds</b>
Arsenic Compounds	4,267
Lead Compounds	2,908,878
Manganese Compounds	23,645
Mercury Compounds	1,691

Nitrate Compounds	448
Cyanide Compounds	14
Hydrogen Cyanide	9,798
Ammonia	1,703
Dioxins and Dioxin-like Compounds	0.66 grams
Total Release	2,950,443

### ***2005 “Releases” – By Media***

<b>Media</b>	<b>Release in Pounds</b>
“Release” to Air	11,823
“Release” to Water	0
“Release” to Land	2,938,620
Total Release	2,950,443

### ***2005 “Releases” Naturally Occurring vs. Synthetic Substances***

<b>Type</b>	<b>Release in Pounds</b>
Synthetic	12,218
Naturally Occurring	2,938,225
Total Release	2,950,443

### **History of Reported “Releases”**

1998 through 2005 – 99.6 to 99.9% of all annually reported “releases” have been naturally occurring metal compounds found in the rock moved for mining operations.

## Recycling

Reporting of arsenic and lead is required because of CC&V's agency approved recycling of decommissioned leach pad material and used oil. The reuse of old leach pad materials as road base and blast hole stemming eliminates the need to develop new gravel sources and associated disturbances. Use of the used oil to heat the truck maintenance facility reduces the need to burn natural gas, which everyone knows is in short supply. If CC&V had chosen not to institute these two environmentally sound practices, CC&V would not have reached the reporting thresholds for arsenic and lead and CC&V's total reported release would have only been 13,652 lbs, which is 2,936,791 lbs or about 99% lower than reflected in the 2005 release data.

## 2005 Release Report

Due to recent changes, the 2005 TRI "release" figures do not include overburden material that is excavated and moved from one area to another. Prior to 2002, the naturally occurring components of the rock that were placed in storage areas designed to minimize exposure to the elements were reported as "releases," but a federal district court determined that was inappropriate for "de minimis" constituents. There is no "de minimis" exemption assigned for naturally occurring lead and mercury compounds in overburden rock. Hence part per million concentrations of lead and mercury compounds naturally occurring in the rock are reported as a "release" to land under TRI reporting requirements.