

Reducing TRI (Toxics Release Inventory) Reportable Quantities Through CCP Marketing

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ABSTRACT

Beginning in July of 1999, coal-fired electric power utilities are required to report TRI (Toxics Release Inventory—40 CFR 372.22, Reporting Requirements) quantities for the first time. This regulatory program, which has been applicable to chemical manufacturing and to a number of other industries for several years, is now applicable to utilities due to the Environmental Protection Agency's interpretation of coal combustion as a manufacturing process. The program requires regulated industries to report the quantities of some 650 chemicals which are "manufactured," "processed," or "otherwise used" at or above threshold quantities.

Coal contains 20-25 of these chemicals as naturally occurring compounds. Therefore, utilities will be reporting on chemical compounds such as acid aerosols of sulfuric, hydrochloric, and hydrofluoric acids, and compounds of trace metals such as arsenic, cadmium, and chromium. In addition to reporting these quantities, TRI requires regulated industries to put plans in place for reducing the quantities of these compounds generated. Concentrations of these compounds present in materials that are further processed or sold can be deducted from the reportable quantities. The concentrations of reportable compounds present in CCPs account for only about 10-15% of the total reportable quantity for a typical coal-fired plant. However, the marketing and utilization of CCPs is one of the few avenues available for reducing the quantities of these compounds generated while maintaining coal burn and generation capacity.

This paper will present as a case study how the Tennessee Valley Authority calculated and reported TRI releases for several of its plants to illustrate the impact of CCP marketing.