



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENVIRONMENTAL INFORMATION

To Whom It May Concern:

We are sending you this letter because we have discovered a problem with the way EPA's Toxics Release Inventory (TRI) automated reporting software -- ATRS 2000 -- handles a new or revised submission for vanadium or vanadium compounds. Our records show for the last reporting year (RY1999), your facility submitted vanadium (fume or dust) and are, therefore, likely to submit vanadium (except when contained in an alloy) or vanadium compounds this reporting year. This letter tells you where to obtain a software patch to avoid problems with vanadium compound submissions, and provides guidance on how to avoid problems with vanadium (except when contained in an alloy) or vanadium (fume or dust) submissions. We apologize for the inconvenience this software error may cause and hope that this letter will preempt problems.

Vanadium Compounds

TRI added vanadium compounds to the EPCRA Section 313 list of toxic chemicals beginning with reporting year 2000, with submissions due to the EPCRA Reporting Center this July 1. We have discovered that the chemical table within ATRS 2000 was not properly programmed for vanadium compounds. If you report vanadium compounds on a Form R using ATRS 2000, the software will not recognize this category as a metal and will allow the inappropriate use of certain "M" codes in section 6 of part II of the Form R. Only certain recycling or disposal "M" codes may be used for metals and metal compounds. (For more detailed instruction on the use of proper "M" codes with metals and metal compounds, see page 47 of the Reporting Year 2000 Reporting Forms and Instructions that you received with your ATRS 2000 CD.)

A patch for ATRS 2000 is available for downloading if you will be reporting vanadium compounds for reporting year 2000. This patch ensures that ATRS 2000 recognizes vanadium compounds as metal compounds, thus allowing a submitter to use the appropriate "M" codes. The patch can be found at <http://www.epa.gov/tri/atrs/>. If you have any difficulties downloading this patch, please contact ATRS Technical Support at 703-816-4434 or atrs.tech.support@epcra.org.

Vanadium (fume or dust) and Vanadium (except when contained in an alloy)

In rulemaking, EPA removed the "fume or dust" qualifier from vanadium and substituted the qualifier "except when contained in an alloy". From reporting year 1987 through reporting year 1999 vanadium should be reported with the qualifier "fume or dust". Beginning in reporting year 2000, vanadium should be reported with the qualifier "except when contained in an alloy". If you submit a hard copy Form R or Form A, please be certain to use the appropriate qualifier.

Due to a programming error, ATRS 2000 does not display or validate both versions of vanadium correctly. If you use ATRS to report your Form R or Form A submissions, we want to inform you of the following when using ATRS 2000:

Newly Created RY2000 Submission: If you create a brand new submission for vanadium (except when contained in an alloy), you should experience no problems.

RY2000 Submission Based On Reload of RY99 Data: If you submitted vanadium (fume or dust) last year, reload that data and try to revise the chemical name to "vanadium (except when contained in an alloy)", you will not find "vanadium (except when contained in an alloy)" in the pick list. To make it appear, select another chemical. Now go back to the pick list and "vanadium (except when contained in an alloy)" will appear and you may select it.

Revision of RY99 or Earlier Submission: If you are revising a vanadium (fume or dust) submission for a reporting year before 2000, ATRS 2000 will apply validation logic appropriate for use with vanadium (except when contained in an alloy), not validation logic appropriate for vanadium (fume or dust). Specifically, ATRS 2000 will inappropriately constrain the use of "M" codes in section 6 of part II of the Form R. No simple programming patch is available for this problem. We suggest that you use a previous version of ATRS to submit your revision or mark up a hardcopy of the original submission using blue ink and have the certifying official resign it.

First Time Submission for RY99 or Earlier: If you need to report vanadium (fume or dust) for the first time (i.e., submitting for reporting year 1999 or prior for the first time), we recommend you use ATRS99 instead of ATRS 2000. ATRS 99 is available at www.epa.gov/tri/atrs/atrs99.

We continue to update our website with any changes or new information under our "What's New" category, and encourage you to visit our website often at <http://www.epa.gov/tri> . If you have any questions or concerns, please contact Wendy Timm at 202-260-3875 or timmm.wendy@epa.gov .

Sincerely,

Bruce Schillo, Branch Chief
TRI Information and Outreach Branch