



# **TOXICS RELEASE INVENTORY**

## **List of Toxic Chemicals within the Chlorophenols Category**

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) requires certain facilities manufacturing, processing, or otherwise using listed toxic chemicals to report the annual quantity of such chemicals entering each environmental medium. Such facilities must also report pollution prevention and recycling data for such chemicals, pursuant to section 6607 of the Pollution Prevention Act, 42 U.S.C. 13106. EPCRA section 313 is also known as the Toxics Release Inventory (TRI).

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## DISCLAIMER

This guidance document is intended to assist industry with EPCRA section 313 reporting for the chlorophenols category. In addition to providing an overview of aspects of the statutory and regulatory requirements of the EPCRA section 313 program, this document also provides recommendations to assist industry with EPCRA reporting. These recommendations do not supersede any statutory or regulatory requirements, are subject to change, and are not independently binding on either EPA or covered facilities. Additionally, if a conflict exists between guidance on this site and the statutory or regulatory requirements, the conflict must be resolved in favor of the statute or regulation.

Although EPA encourages industry to consider these recommendations, in reviewing this document, industry should be aware that these recommendations were developed to address common circumstances at typical facilities. The circumstances at a specific facility may significantly differ from those contemplated in the development of this document. Thus, individual facilities may find that the recommendations provided in this document are inapplicable to their processes or circumstances, and that alternative approaches or information are more accurate and/or more appropriate for meeting the statutory and regulatory requirements of EPCRA section 313. To that end, industry should use facility specific information and process knowledge, where available, to meet the requirements of EPCRA section 313. EPCRA section 313 also provides that, in the absence of such readily available data, a reporting facility may make reasonable estimates to meet those EPCRA section 313 requirements. Facilities are encouraged to contact the Agency with any additional or clarifying questions about the recommendations in this document, or if the facility believes that EPA has incorrectly characterized a particular process or recommendation.

Additional guidance documents, including industry specific and chemical specific guidance documents, are also available on TRI's GuideME website:

[https://ofmpub.epa.gov/apex/guideme\\_ext/f?p=guideme:gd-list](https://ofmpub.epa.gov/apex/guideme_ext/f?p=guideme:gd-list)

## SECTION 1.0 INTRODUCTION

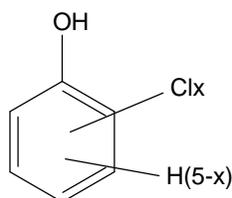
EPCRA section 313 requires threshold determinations for chemical categories to be based on the total of all chemicals in the category manufactured, processed, or otherwise used. For example, a facility that manufactures three members of a chemical category would count the total amount of all three chemicals manufactured towards the manufacturing threshold for that category. When filing reports for chemical categories, the releases are determined in the same manner as the thresholds. One report is filed for the category and all releases are reported on this form.

EPA is providing a following list of chemical names and Chemical Abstract Service (CAS) numbers to aid the regulated community in determining whether they need to report the chlorophenols category. Although this list covers all members of the category (except those that are individually listed), there may be CAS numbers, not included in this list, that represent mixtures of chlorophenols or mixtures of chlorophenols and other chemicals. If a facility is manufacturing, processing, or using a chemical which meets the chlorophenol definition, they must report under EPCRA section 313, even if the CAS number does not appear on the following list.

For general instruction regarding compliance with EPCRA section 313 requirements and form completion, please see the most recent version of the Toxic Chemical Release Inventory Reporting Forms and Instructions, available at: [https://ofmpub.epa.gov/apex/guideme\\_ext/f?p=guideme:rfi-home](https://ofmpub.epa.gov/apex/guideme_ext/f?p=guideme:rfi-home)

## SECTION 2.0 CHLOROPHENOLS CATEGORY DEFINITION

The chlorophenols category is defined by the following structure:



Where  $x = 1$  to  $5$

Chemicals that meet this category definition are reportable.

## SECTION 3.0 INDIVIDUALLY LISTED CHLOROPHENOLS

The following four chlorophenols are individually listed on the EPCRA section 313 chemical list and therefore, are not included in the chlorophenols category:

- 2,4-dichlorophenol (CAS number 120-83-2)
- 2,4,5-trichlorophenol (CAS number 95-95-4)
- 2,4,6-trichlorophenol (CAS number 88-06-2)
- pentachlorophenol (CAS number 87-86-5)

Threshold determinations should be made for each of these chemicals individually and separately from the chlorophenols category.

## SECTION 4.0 CHLOROPHENOLS INCLUDED IN THE EPCRA SECTION 313 CHLOROPHENOLS CATEGORY

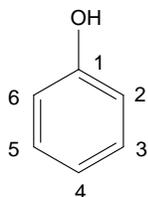
EPA is providing the following list of chemical names and CAS numbers to aid the regulated community in determining whether they need to report the chlorophenols category. Although this list covers all members of the category (except those that are individually listed which are identified above), there may be CAS numbers, not included in this list, that represent mixtures of chlorophenols or mixtures of chlorophenols and other chemicals. If a facility is manufacturing, processing, or using a chemical which meets the chlorophenol definition, they must report under EPCRA section 313, even if the CAS number does not appear on the list in Table 4-1.

Chlorophenols may be named using either numbers or letters (o, m, p), where:

- ortho (o) = 2
- meta (m) = 3
- para (p) = 4

Example: 2-chlorophenol = o-chlorophenol

Positions 1 through 6 on the ring are defined as in the structure below:



Example: 2,3-dichlorophenol would have chlorines at the 2 and 3 positions

**Table 4-1: List of Chemicals Included in the EPCRA Section 313 Chlorophenols Category**

Name	CASRN
<b>Monochlorophenols</b>	
2-chlorophenol	95-57-8
3-chlorophenol	108-43-0
4-chlorophenol	106-48-9
3-(or 2) -chlorophenol	29353-84-2
Chlorophenol	25167-80-0
<b>Dichlorophenols</b>	
2,3-dichlorophenol	576-24-9
2,5-dichlorophenol	593-78-8
2,6,-dichlorophenol	87-65-0
3,4,-dichlorophenol	95-77-2
3,5,-dichlorophenol	591-35-5
2,3, (or 3,4)-dichlorophenol	83700-00-9
Dichlorophenol	25167-81-1

Name	CASRN
<b>Trichlorophenols</b>	
2,3,4,-trichlorophenol	15950-66-0
2,3,5,-trichlorophenol	933-78-8
2,3,6,-trichlorophenol	933-75-4
3,4,5-trichlorophenol	609-19-8
2,3,5-(2,3,6 or 2,4,5)-trichlorophenol	119692-99-8
2,4,?-trichlorophenol <sup>1</sup>	95719-03-2
Trichlorophenol	25167-82-2
<b>Tetrachlorophenols</b>	
2,3,4,5-tetrachlorophenol	4901-51-3
2,3,4,6-tetrachlorophenol	935-95-5
2,3,5,6-tetrachlorophenol	58-90-2
2,4,?,?-tetrachlorophenol <sup>1</sup>	195719-04-3
Tetrachlorophenol	25167-83-3

<sup>1</sup>? means that the position of the chlorine is unspecified.