



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

August 7, 2002

OFFICE OF
ENVIRONMENTAL INFORMATION

Martin G Trembly
Environmental Engineer - Principal
Global Environmental Services
The Goodyear Tire & Rubber Company
Akron, OH 44316-0001

Dear Mr. Trembly:

This is a response to your July 12, 2002, letter regarding the reporting requirements of section 313 of the Emergency Planning and Community Right-to-Know Act. Specifically, you want to know if activities at a shooting range at your facility involving lead and lead compounds need to be considered towards threshold and release and other waste management calculations.

In your letter you state that a shooting range located at your facility is operated only for employee recreational use. You ask if the activity of shooting a bullet is considered a threshold activity and if the personal use exemption would apply to toxic chemicals at the range. Toxic chemicals used to shoot bullets are considered otherwise used. However, because the shooting range at your facility is used solely for employee recreational purposes, the toxic chemicals otherwise used at the range would qualify for the personal use exemption. Please be aware that the personal use exemption applies only to the otherwise use of toxic chemicals. Thus, if lead, lead compounds or any other toxic chemical are being manufactured during activities at the shooting range they must be considered towards the appropriate manufacturing threshold.

I hope this information is helpful to you in understanding the reporting requirements of section 313 of EPCRA. If you have any other questions, or desire further information, please call Marc Edmonds, of my staff, at 202-566-0758.

Sincerely,


John M. Dombrowski, P.E., Chief
TRI Regulation Development Branch