

## 2. Questions and Answers

Refer to the following question-and-answer section regarding calculating quantities and making notifications.

### **CONTENTS** (Question and answer section)

#### **2-1 Notifications**

##### **2-1-1 Notifications in general**

Q 1	What do we have to submit?	III - 117
Q 2	Notification by a substitute person	III - 117
Q 3	Notification by a person not belonging to the corporation	III - 117
Q 4	When the address of the head office is not the same as the registered address	III - 117
Q 5	What to enter in “name in previous notification” field?	III - 118
Q 6	Notification on MO disk in the case where multiple business establishments are located in the same prefecture	III - 118
Q 7	Request for disclosure of confidential information in the category that is not the main line of business	III - 118

##### **2-1-2 Move/merger/closure of businesses/business establishments**

Q 8	Move of business establishment	III - 119
Q 9	Merger of multiple businesses	III - 119
Q 10	When business is started in the year following the pertinent fiscal year	III - 119
Q 11	When the company goes bankrupt, is closed, or the name of business establishment is changed during the fiscal year	III - 120

##### **2-1-3 Consignment relation between businesses**

Q 12	When a part of a process is consigned to another business	III - 120
Q 13	When a subsidiary is located within the premises	III - 121
Q 14	When a business activity is performed on leased premises	III - 121
Q 15	When activities of businesses whose business establishments are adjacent to each other are managed integrally	III - 121
Q 16	When a fumigation warehouse is rented	III - 121

## **2-2 Range of businesses or business establishments subject to notification**

### **2-2-1 Range of businesses or business establishments subject to notification in general**

Q 17	How to enter business codes?	III - 122
Q 18	Entering business codes following the revision of the Japan Standard Industry Classification	III - 122
Q 19	Judgment of the range of business establishments	III - 122
Q 20	When a business establishment performs business other than those subject to notification	III - 124
Q 21	When business that does not fit into the category subject to notification only is performed	III - 124
Q 22	When multiple businesses are performed at the same time	III - 125

### **2-2-2 Hospitals**

Q 23	When a hospital owns an incinerator	III - 125
Q 24	University hospitals	III - 125
Q 25	Hospitals run by an enterprise	III - 126

### **2-2-3 Business establishments of administrative bodies**

Q 26	The grounds for the submission of notification by the government or local public organizations	III - 126
Q 27	Who should submit notifications for the government or local public organizations, and the number of employees	III - 126
Q 28	To which ministry should the government of local public organizations submit notifications?	III - 127

### **2-2-4 Businesses other than the above**

Q 29	Businesses included in miscellaneous manufacturing businesses	III - 127
Q 30	When a business that sells automobile parts extracts chlorofluorocarbons	III - 127
Q 31	Power plant under construction	III - 128

## **2-3 Number of full-time employees**

Q 32	When the number of full-time employees is 21 or less	III - 129
Q 33	Number of employees when the work is consigned to another company	III - 129

## 2-4 Specified substances

### 2-4-1 Metals and their compounds

Q 34	Range of individual metals and their compounds subject to notification	III - 130
Q 35	Range of individual compounds specified as "soluble in water"	III - 130
Q 36	Range of individual substances specified as "zinc and its water-soluble compounds"	III - 130
Q 37	Annual quantity of metals and their compounds handled, released, etc.	III - 130
Q 38	When hexavalent chromium compound turns into trivalent chromium compound by neutralizing sedimentation treatment	III - 131
Q 39	When a part of hydrofluoric acid is released as gaseous form of hydrogen fluoride	III - 131

### 2-4-2 Specified substances other than metals

Q 40	When bisphenol A epoxy resin in solid form is handled	III - 131
Q 41	When hydrazine hydrate is handled	III - 132
Q 42	When hydrazine derivatives are handled	III - 132
Q 43	Coplanar PCB contained in dioxins	III - 132
Q 44	Range of substances generated or released as a result of business activities	III - 133
Q 45	Notification of substances that have different names	III - 133

### 2-4-3 Others

Q 46	Possibility of the change of specified substances in the future	III - 133
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## 2-5 Assessment of the quantity handled

### 2-5-1 Assessment of the quantity manufactured

Q 47	When a specified substance contained in Naphtha is extracted	III - 134
Q 48	When a specified substance contained in coal handled in a thermal power plant is released, and when chloroform is generated while kraft pulp is bleached	III - 134
Q 49	When metal board is etched	III - 134

### 2-5-2 Content of specified substances

Q 50	Content of specified substances used	III - 135
Q 51	When a specified substance is diluted with solvent, etc.	III - 135
Q 52	When the content of a specified substance in products is at the mass percentage of 1% or less	III - 135
Q 53	Specified substances contained in petroleum fuels, etc.	III - 135

**2-5-3 Requirements for quantities of raw materials or materials handled which need not be assessed**

Q 54	Raw materials or materials whose quantity handled need not be assessed	III - 136
Q 55	Products for general consumers	III - 136
Q 56	When waste is accepted	III - 136
Q 57	When TV cathode ray tubes or fluorescent lamps are handled	III - 136
Q 58	When incandescent or fluorescent lamps are handled	III - 137
Q 59	When partially-fabricated products such as electric circuit boards are purchased	III - 137
Q 60	When stainless steel products are handled	III - 137
Q 61	When fabrics containing fire retardant additives are handled	III - 138
Q 62	When old devices are returned back to the manufacturer	III - 138
Q 63	When incineration ash containing dioxins are used as raw materials for bricks	III - 138
Q 64	When capacitors containing PCB are stored in a warehouse	III - 139
Q 65	When welding cores or welding base materials are used	III - 139
Q 66	When stainless steel boards containing specified substances are bonded by welding	III - 139
Q 67	When solder is used	III - 139
Q 68	When glass is used	III - 140
Q 69	When additives are kneaded in the process of manufacturing pellets	III - 140
Q 70	When coating materials of electric wires are fabricated using pellets as raw materials	III - 140
Q 71	When cutting tools containing specified substances are used	III - 141
Q 72	When metals or plastics are polished or cut	III - 141

**2-5-4 Other questions on the assessment of handled quantity**

Q 73	When stock that was received before the pertinent fiscal year is used	III - 142
Q 74	When fabrication chips generated within business establishment are recycled	III - 142
Q 75	When developing fluid is handled in X-ray room for the purpose of health checks of employees	III - 142
Q 76	When chlorofluorocarbon is extracted by an automobile maintenance business	III - 142
Q 77	When agricultural chemicals to be sprayed on lawn, detergent for restaurant, paint for coating the wall of the factory, or gasoline for company vehicles are used	III - 143

## 2-6 Calculation of release/transfer

### 2-6-1 Classification for notification of release/transfer

Q 78	When waste is delivered to another business establishment of the same corporation	III - 144
Q 79	When spent oil is delivered to a recycling service	III - 144
Q 80	When business A delivers metal chips generated to business B, which then performs intermediate treatment to produce metals and sells them to business C	III - 144
Q 81	When metal chips, etc. are accepted for pay	III - 145
Q 82	When waste liquid generated is delivered to another business establishment of the same business, where treatment is performed and the treated liquid is released to surface water	III - 145
Q 83	When waste liquid is released to agricultural channels	III - 146
Q 84	When metal fumes are emitted to air in the process of welding	III - 146
Q 85	When metallic compounds are released to combustion facilities	III - 146

### 2-6-2 Calculation using actual measurement values

Q 86	When actual measurement values of the content of specified substances in waste are not available	III - 146
Q 87	Possibility of adopting the result of elution test of incineration ash, etc.	III - 147
Q 88	When removal rate or actually measured concentration of exhaust gas, effluent treat facilities is not available	III - 147
Q 89	When the measured data is the same or larger than the minimum limit of detection and lower than the minimum limit of determination, or lower than the minimum limit of detection	III - 147
Q 90	When the measurement data of dioxins is the same or larger than the minimum limit of detection and lower than the minimum limit of determination, or lower than the minimum limit of detection	III - 148

### 2-6-3 Calculation of release etc. in various processes

Q 91	Assessment of the quantity released as manufactured goods from plating process	III - 148
Q 92	Plating process where nickel is used as an electrode and nickel compounds are used as plating liquid	III - 148
Q 93	When specified substances recovered by activated carbon adsorption method is reused	III - 149
Q 94	When a specified substance leaks from the junction of pipeline or flange	III - 149
Q 95	When toluene is used as a combustion promoter for organic solvent incineration facility	III - 150
Q 96	Drying process of washing detergent manufacturing	III - 150
Q 97	When reagents are filled in containers	III - 150
Q 98	Calculation of the release from research laboratories	III - 150
Q 99	Calculation of the release from machinery repair industry	III - 151
Q 100	When business activities are performed outside the business establishment	III - 151

#### 2-6-4 Assessment of the release from automobile/refueling facilities

Q 101	When automobiles are owned by a business establishment	III - 151
Q 102	When ships are owned by a business establishment	III - 151
Q 103	When business establishment is provided with a facility to feed gasoline	III - 151
Q 104	When vehicles exclusive for the use within the premises (such as fork lift) are owned	III - 152
Q 105	Gas stations	III - 152
Q 106	When specified substances are transported	III - 152

#### 2-6-5 Others

Q 107	Comparing the quantity released to air and water	III - 153
Q 108	When the released quantity is assessed by the year by foreign-affiliated enterprises	III - 153
Q 109	Name of the rivers to be entered in the notification form	III - 153
Q 110	Necessity of entering the annual quantity handled	III - 153
Q 111	When almost no quantity is released to the environment	III - 153

#### 2-7 Specific requirement facilities

Q 112	Specified substances to be notified by businesses having general/industrial waste treatment facilities or sewage treatment facilities	III - 154
Q 113	Releases, etc. assessed according to regulations other than the Law	III - 155
Q 114	When measurement is not performed irrespective of the requirement to do so	III - 155
Q 115	General waste treatment facility that does not release effluent or general waste incineration plant built so as not to release effluent	III - 155
Q 116	When the range of measurement items for manganese soluble in water, etc. designated by other regulations does not coincide with the range of substances specified under the PRTR system	III - 156
Q 117	Measurement result of EPN	III - 156
Q 118	Sewage service companies not connected to business sites that fall under the category subject to notification	III - 157
Q 119	When the measurement result is the same or lower than the minimum limit of determination	III - 157
Q 120	General waste treatment facility set up by local municipalities	III - 158
Q 121	Number of employees in the case where a special local public entity consigns waste collection and transport to a private enterprise	III - 158
Q 122	When specified substances are released to sewage from general waste incineration plants or final treatment plants	III - 159
Q 123	When an incineration facility is provided both for waste treatment business category and night soil treatment business category	III - 159
Q 124	When a bulky waste treatment facility, recycling facility, waste transfer station etc., are independent business establishments	III - 160

## Questions and Answers

### 2-1 Notifications

#### 2-1-1 Notifications in general

Q 1 What do we have to submit?

A 1 Submit "Notification Form of the Quantity of Class 1 Designated Chemical Substances Releases and Transfers" (the form to be filled out with a general description of each establishment, and with the attached sheets to be filled out with the releases and transfers by specified substance), in accordance with the filling-out procedure specified by the relevant ordinance. You do not have to submit worksheets.

Q 2 It is specified that notifications must be submitted in the name of the representative of a corporate body. Can a substitute person submit notifications?

A 2 As stated on page 5 of the "Instructions for entry in PRTR notification form" (March 2003, Ministry of Economy, Trade and Industry, hereafter referred to as "Entry Instructions"), notifications can be done by those responsible for managing chemical substances handled in the pertinent business establishment such as a plant manager or the general manager of the establishment. The notification form has a field for entering the name of the person entrusted with notification.

Q 3 Can a person who does not belong to the corporation be entrusted with notifications?

A 3 The only persons who can be entrusted with notifications are those responsible for the management of chemical substances handled in the pertinent business establishment such as a factory manager or the general manager of the establishment. Those who do not belong to the designated business organization are not permitted to submit notifications on behalf of the corporation.

Q 4 Address (location of head office) of a business submitting notifications  
If an establishment of the business submitting notifications does not exist at the registered address, and the head office is at another place, should the registered address or the actual address of the head office be entered?

A 4 If the actual address of the head office and the registered address are different, enter the registered address.

Q 5 What should we enter in the “name in previous notification” field?

A 5 Enter the field only if the name of the business or business establishment has been changed since the previous notification was submitted (including the change resulting from merger). (Refer to page 6 of the Entry Instructions.)  
If multiple businesses have been merged into one business subject to notification, enter all the names of the businesses before the merger. If multiple business establishments have been merged into or acquired by the business establishment subject to notification, enter all the names of the business establishments before the merger or acquisition.

Q 6 If a business has multiple establishments within one prefecture, and wants to submit notifications on MO disk, can it submit notifications on multiple establishments on one “MO disk” together with “MO disk submission form?”

A 6 In such cases, you can submit notifications on establishments located within one prefecture on one MO disk. Note that you must list all the names of business establishments whose information is stored on the MO disk on its label. For easy identification, assign different file names to each establishment. (Example: Establishment xyz, or Establishment 1, Establishment 2, .....)

Q 7 If we need to request the disclosure of confidential information regarding operations in a category that is not our major field of business, to which authority should we make the request?

A 7 Make the request to the ministry of the authority in charge of the business relating to the confidential information you want, and not to the ministry in charge of your major business. (Refer to page 3 of the Entry Instructions.)



## 2-1-2 Move/merger/closure of businesses/business establishments

Q 8 If an establishment was relocated in the previous year and the name was changed, how should we list the name of the establishment and its address?

A 8 List both the names and addresses before and after the relocation as two separate establishments.

Q 9 If multiple companies including the pertinent business have merged during the fiscal year, which entity should submit what kind of notifications? For example, if business A and business B (both of them handle class 1 designated chemical substances) merged to form business C on October 1, 2003, and the name (a1) of a business establishment of business A was changed to business establishment c1, and the name (b1) of a business establishment of business B was changed to business establishment c2, what notifications should we submit?

A 9 Notifications must be submitted by the entity that has taken over the rights and obligations of the business that undertook the obligation of assessing the quantity of specified substances in the pertinent fiscal year. In the above example, the obligation of submitting notifications by business A and business B was taken over by business C. Therefore, business C must submit notifications by filling out both of the following two notification forms.

- (1) Notifications regarding the release from April 1, 2003 to March 31, 2004 (Name of business: A, name of business establishment: a1) (In the calculations, the release during the period from April 1, 2003 to September 30, 2003 and that during the period from October 1, 2003 to March 31, 2004 must be summed up as the release from “business establishment b1” and that from “business establishment c1” respectively.)
- (2) Notification regarding the release from April 1, 2003 to March 31, 2004 (Name of business: B, name of business establishment: b1) (In the calculations, the release during the period from April 1, 2003 to September 30, 2003 and that during the period from October 1, 2003 to March 31, 2004 must be summed up as the release from “business establishment b1” and that from “business establishment c2” respectively.)

Q10 Although we did not do business subject to notifications in the applicable fiscal year (in the year 2002 for example), we started a designated business in the next fiscal year (2003). Do we have to submit notifications in the pertinent fiscal year (2003)?

A10 Since you do not satisfy the requirements for quantities handled in the applicable fiscal year, you do not have to submit notifications.

Q11 If the company goes bankrupt during the fiscal year, do we have to submit notifications the next fiscal year?  
If the factory (business establishment) closes during the fiscal year, do we have to submit notifications on the pertinent establishment the next fiscal year?  
If the name of the business establishment is changed during the fiscal year, which name, before or after the change, do we have to enter in the notification form of the next fiscal year?

A11 If the rights and obligations of the business subject to notification (company A) have been taken over by another company (company B), the latter (company B) must submit notifications for the former (company A). Meanwhile, if no entity has taken over the rights and obligations of the business (company A) because the business has closed down or the corporation has broken up, notification is not required. If the business that had owned the closed business establishment still exists, the pertinent business must submit notifications via the governor of the prefecture where the closed business establishment existed. The business whose name was changed during the fiscal year must enter the name of the business establishment as of the beginning of the applicable fiscal year (April 1) in principle. (Enter the name of a new business establishment, if created during the pertinent fiscal year, at the time of the creation.)

### 2-1-3 Consignment relation between businesses

Q12 If part of a manufacturing process inside establishment A is consigned to establishment B, which establishment is responsible for notifying the quantity released from the process consigned to establishment B?

A12 When a work is consigned to other establishments, the details and forms of consignment vary greatly and so there are no fixed criteria. The following is a guideline for judgment. If the business activity of establishment B is supervised by establishment A (a supervisor from establishment A is in charge of the handling of chemical substances by establishment B), establishment A must make a notification including the process consigned to establishment B. In this case, the number of employees of establishment B working in the process is considered to be the employees of establishment A. On the other hand, if the business activity by establishment B is supervised by itself (a supervisor of establishment B is in charge of the handling of chemical substances by establishment B), establishment B must notify the quantity released from the process consigned to it, separately from the processes which establishment A is in charge of (establishment A must notify the quantity released from those processes).

Q13 When the factories of company A and company B exist in the same premises, and company B is a subsidiary of company A, can company A submit notifications for company B together with those of its own?

A13 If business establishments located in the same premises are run by different businesses (having different corporate status), both companies, A and B, must submit separate notifications in principle. Refer also to Q12.

Q14 If establishment A is renting land to establishment B, and establishment B is carrying out business activities on that land, which establishment must notify specified substances released from there?

A14 Judgment cannot be made based on ownership of the land. As in the case of Q12 above, judge depending on which establishment is supervising the business activity carried out by establishment B (whether the supervisor of the handling of chemical substances by establishment B belongs to A or B).

Q15 Two adjacent establishments of different businesses (an office and a factory) perform environmental management in cooperation with each other. Is it possible for one establishment to notify the total quantity released or transferred including the quantity released by the other establishment?

A15 Under the Law, each establishment is responsible for making notifications. Therefore, if each establishment has its own supervisor, both of them must make a notification separately. Refer to Q12.

Q16 A business that owns a fumigation warehouse is renting out the warehouse to a fumigation service under contract. The pertinent business collects rent from the fumigation service periodically, but does not know what chemical substances are used for fumigation. In such cases, which entity must submit notifications, the owner of the facility or the fumigation service that actually performs fumigation?

A16 If the pertinent business is running warehouse services and the fumigation company performs fumigation within the warehouse rented from the business, the entity that should manage the warehouse is the pertinent warehouse service, which therefore must submit notifications. Note that the fumigation service does not have to make notifications because it releases chemical substances at a place that is not its own business establishment.

## 2-2 Range of businesses or business establishments subject to notification

### 2-2-1 Range of businesses or business establishments subject to notification in general

Q17 Do we have to enter the business code in 4 digits without fail?

A17 Enter the code listed in the Entry Instructions only (in 4 digits) in the business code field of the notification form. For example, for those with the last 2 digits expressed as 00, do not enter more detailed business classifications or code numbers according to the Japan Standard Industry Classification. Do not enter the symbols listed in the far left of the table in 4-1-1 of Part III (→ pIII-165).

Example: × “Manufacture of plastic pipes 2212\*” →  
O “Manufacture of plastic products 2200”  
× “Manufacture of food 3a” →  
O “Manufacture of food 1200”

\* Classification No. of the Japan Standard Industry Classification

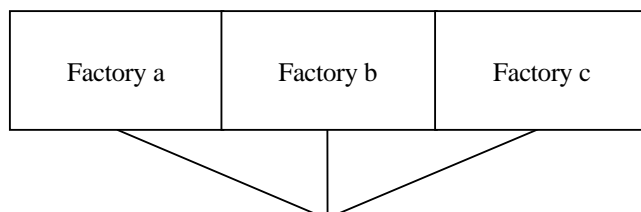
Q18 The Japan Standard Industry Classification was revised in 2002. Which code should we enter, the one before or after the revision?

A18 Enter the industrial classification code listed in the Entry Instructions. Do not enter the classification number listed in the Japan Standard Industry Classification. Refer also to Q17.

Q19 What is the range of a “business establishment” under the Law?

A19 Article 5 of the Law (→ pIII-299) defines a “business establishment” as a single place where business activities, which fall under a category of business designated by regulations, are performed.  
In principle, a “business establishment” is an entity that continuously performs business activities within the same or adjacent premises under the control of one management body.

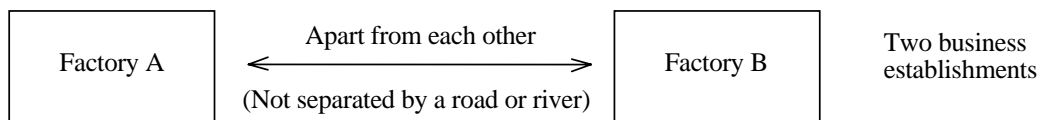
[Example 1] If factories “a,” “b” and “c,” which manufacture different products, are run by the same management body within the same or adjacent premises, they are regarded as one business establishment.



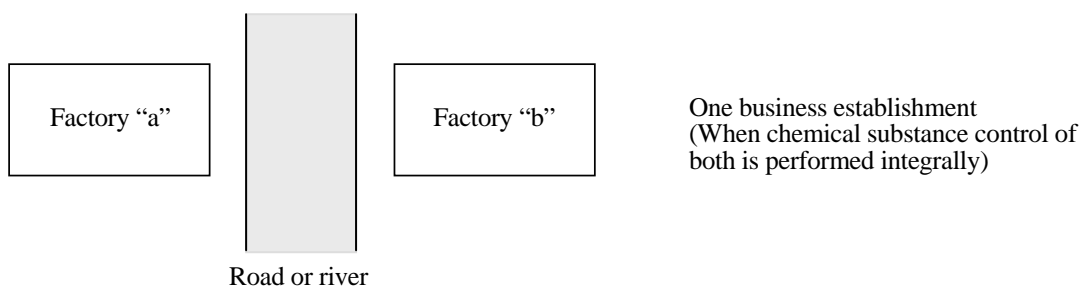
Within the same premises or adjacent premises

One business establishment

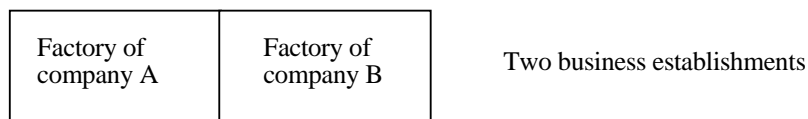
[Example 2] If factory A and factory B of one company are located apart from each other, they are regarded as separate business establishments in principle. If a university has separate campuses, or self-defense force stations and bases under the same name are located apart from each other, each one is regarded as a separate business establishment.



[Example 3] Even if factory “a” and factory “b” of the same company are separated by a road or river under the condition described in example 2, if they are adjacent to each other and chemical substances are integrally controlled, factory “a” and factory “b” may be regarded as one business establishment.



[Example 4] If a factory of company A and a factory of company B exist within the same or adjacent premises, they must be regarded as separate business establishments because their management bodies are different.



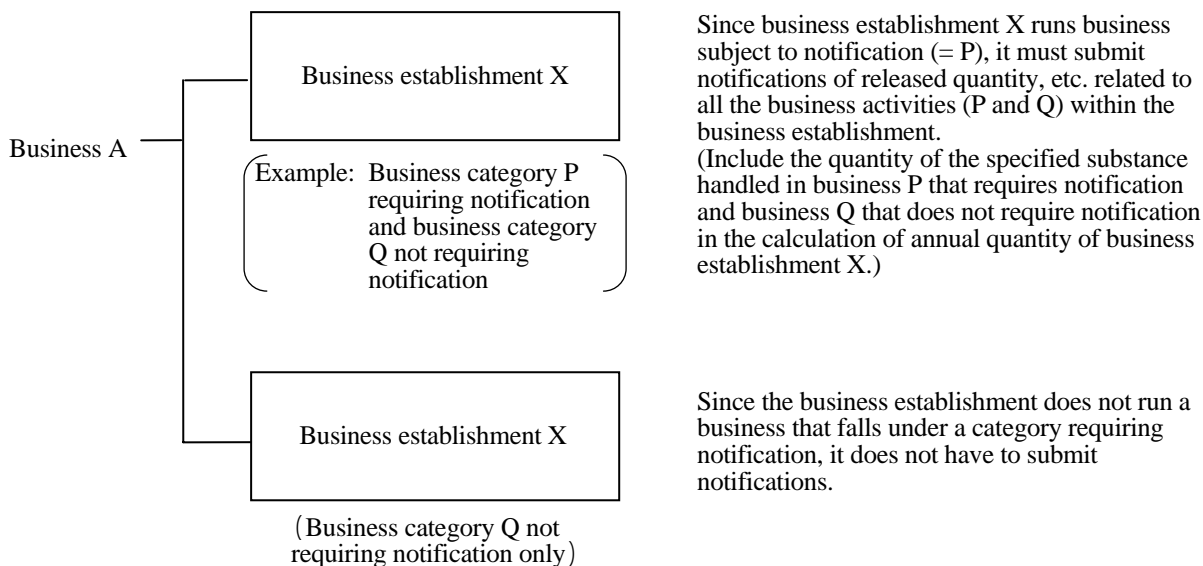
[Example 5] Those with no resident workers could be a “business establishment.” In such a case, the “business” must assess the quantity of specified substance released and submit notifications.

Q20 If a business establishment is running another business that falls under a business category not requiring notification at the same time, the establishment must notify the quantity of specified substances handled within the establishment (including those handled in the business category not subject to notification). Is that right?

A20 That's right.  
List the businesses subject to notification only in the field "Category to which the business run in the business establishment belongs" by referring to page 6 of the Entry Instructions.

Q21 If a business establishment runs businesses not subject to notification only, does it have to submit notifications?

A21 If a business that handles class 1 designated chemical substances runs a business categorized into two or more business fields, one of which is designated as requiring notification (hereafter referred to as "applicable business category"), the pertinent business establishment must submit notifications according to the definition of Article 5 of the Law (→ pIII-299). However, if a business handling class 1 designated chemical substances does not run a business that falls under the applicable business category, the pertinent business establishment does not fit into the "business establishment" defined by Article 5 of the Law, and therefore does not have to submit notifications.



Q22 We do business in multiple industries. How do we fill out the business name column on the notification form?

A22 List all the applicable industries. List the major industry in the top row of the form.

## 2-2-2 Hospitals

Q23 Is notification required for a specific requirement facility owned by a hospital (incinerator for example)?

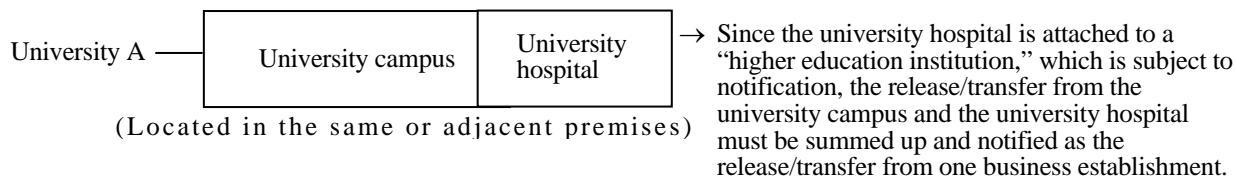
A23 Even if a business, which does not run a business included in the applicable business category, owns a specific requirement facility, the pertinent business establishment does not fit into “business establishment” defined by Article 5 of the Law (→ pIII-299). Therefore, notification is not required.

Q24 Are university hospitals included in the applicable business category?

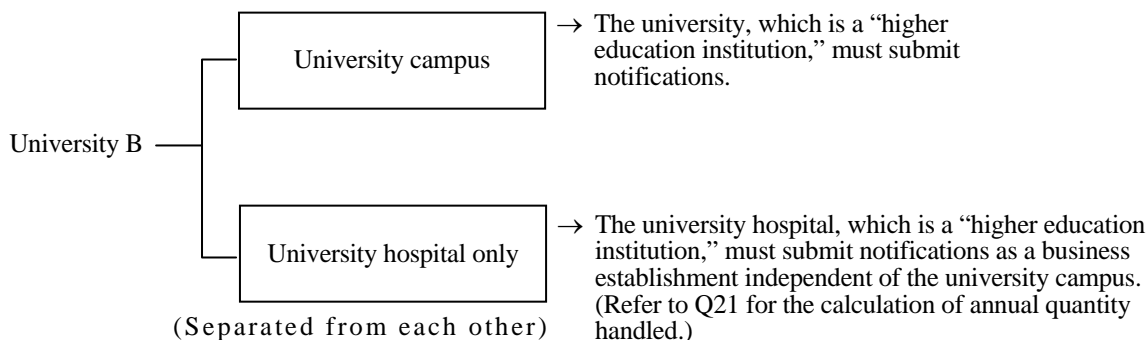
A24 General hospitals, which are classified as a medical business (“88” under medium classification) in a service business (“L” under major classification), do not fall under the applicable business category. However, university hospitals, which are regarded as facilities attached to higher education institutions (“914” under minor classification), must submit notifications. (Article 3 of the enforcement regulations of the law (→ pIII-300) designates that “attached facilities” are included in “higher education institutions.”)

\* Business category numbers in the text are those of the Japan Standard Industry Classification (revised in 1993).

### [Example 1]



### [Example 2]



**Q25** Does an enterprise that runs a hospital have to submit notifications?

**A25** As in the case of Q24, if a medical business is run together with other businesses that are subject to notification within the same premises, the quantity of specified chemical substances released from the medical business of the pertinent business establishment must be summed up and notified. On the other hand, a business establishment, which runs a medical business only within its premises, does not fit into the applicable category, and therefore the release from the pertinent business establishment need not be assessed.

**2-2-3 Business establishments of administrative bodies**

**Q26** Article 3 of the Enforcement Regulations of the Law (pIII-300) does not specify the official businesses of the government or local public organizations. What are the grounds for submitting notifications?

**A26** Article 3 of the Enforcement Regulations of the Law does not specify “official businesses” clearly. However, the businesses run by the government or local public organizations are classified based on the outline of their actual business activities. If the classified businesses are listed in Article 3 of the Enforcement Regulations of the Law, notifications must be submitted.

**Q27** Who should submit notifications for the government or local public organizations, and how should the number of employees be assessed?

**A27** The following table applies.

<b>Business</b>	<b>Representative</b>	<b>Number of Employees</b>
Government* <sup>1</sup>	Minister of each ministry	All the staff (per ministry)
Self-defense force stations, bases, etc.	Management representative of station, etc.	All the staff (per station or base)
Independent administrative institutions, etc.	Manager of independent administrative institution	All the staff (per institution)
National universities	President of national university	All the staff (per university)
Local prefectural governments	Governor of prefecture	All the staff (per prefectural government)
Cities, towns or villages	Governor of local authority	All the staff (per municipality)
Local public enterprises* <sup>2</sup>	General manager * <sup>3</sup>	All the staff (per local public enterprise)
Part of clerical work associations	General manager	All the staff (per association)
Public universities	President of public university	All the staff (per university)
(Reference) Nongovernmental enterprises	Representative executive	All the employees (per business)

\*1 Self-defense force stations and bases excluded.



- \*2 Of enterprises run by local public organizations, those subjected to the designation of Article 2 of the Local Public Enterprise Law (No. 292, enforced in 1952).
- \*3 Head of local public organization when general manager is not placed in accordance with the provision of the conditional clause of Article 7 of the Local Public Enterprise Law

Q28 To which minister should the government or local public organizations submit notifications?

A28 Irrespective of the classification of category of business run by the government or independent administrative institutions, notifications should be submitted to the minister in charge of the pertinent organizations or corporate bodies. Local public organizations (including municipal enterprises) should submit notifications to the minister administering the business run by the pertinent organizations or enterprises.

[Example 1]

Fueling of automobiles made by the staff of the Japan Defense Agency at its stations falls under “fuel retail business,” and the release of specified substances must be notified to the Director-General of the Defense Agency, and not to the Minister of Economy, Trade and Industry.

[Example 2]

The release from business establishments engaged in sewage systems in municipalities or local public enterprises must submit notifications to the minister in charge of sewage works business (Minister of Land, Infrastructure and Transport).

#### 2-2-4 Businesses other than the above

Q29 What kinds of businesses are included in “miscellaneous manufacturing business” (industrial classification code: 3400)?

A29 Precious metal manufacturing, musical instrument manufacturing, toys and sporting goods manufacturing, etc. are included. Refer to [pIII-170](#) of this manual for details. Enter business category code 3400 for PRTR notifications.

Q30 If a business that sells automobile parts and accessories also provides parts repair service, which includes the extraction of chlorofluorocarbons, does it fit into the category requiring notification? (The business has not registered as an automobile maintenance service.)

A30 In such cases, the business run by the pertinent business is categorized as “automobile parts and accessory retail business,” which does not fit into the category requiring notification.

Q31 Is notification required for specified substances contained in paint used for a power plant under construction?

A31 A power plant under construction cannot be considered as running an electricity business. Therefore, it does not fit into an applicable business category unless it runs another business that falls under an applicable business category.

### 2-3 Number of full-time employees

Q32 We have fewer than 21 full-time employees. Do we have to make a notification?

A32 Judge on the basis of the number of full-time employees as of April 1 of the applicable fiscal year or in February or March of the previous fiscal year. If the number of full-time employees at that point is less than 21, you do not have to make a notification. Refer to 1-2 ( pII-8).

Q33 Establishment A is a manufacturer in the chemical industry and handles more than 1 t a year of a specified substance. It has only 10 full-time employees, who do administrative work, and all other employees such as field workers are employed on a contract basis. In this case, must establishment A include the number of employees from the affiliated subcontractors in the number of full-time employees?

A33 Include the number of employees working in an establishment administered by A on a contract basis in the number of full-time employees of establishment A. Refer also to 1-2 ( pII-8) and Q12.

## 2-4 Specified substances

### 2-4-1 Metals and their compounds

Q34 Individual substance names for metallic compounds are not listed. How do we know the substances to be notified?

A34 All the chemical substances with the names specified in government ordinances must be notified, including the chemical substances listed in 4-2-5( [pIII-218](#)).

Q35 Some metallic compounds requiring notification are limited to "water-soluble" ones only. Do we have to notify metallic compounds without such definition (such as manganese compounds) even if they are not soluble in water? By which criteria are "water-soluble" metallic compounds distinguished from water-insoluble compounds?

A35 The toxicity of chemical substances varies depending on solubility in water, so "water-soluble" is added to some chemical substances as required. In the case of metallic compounds without the definition of "water-soluble" such as manganese compounds, all the individual substances must be notified. Calculate the quantity released by converting the value to manganese content including "water-insoluble" substances.

Q36 In the case of "zinc compounds (water-soluble)" (substance No. 1), do we also have to notify "zinc" that is a metallic element?

A36 You need not include "zinc" that is a metallic element; only "water-soluble compounds of zinc" must be considered in the calculations. When a metallic element is also specified as in the case of "cadmium and its compounds" (substance No. 60), "cadmium" that is a metallic element must also be included.

Q37 In calculating the annual quantity of metallic compounds handled, should we use the quantity of compounds?

A37 For chemical substances to be converted to elements (refer to the rightmost column of 4-2-4( [pIII-203](#))) (metallic compounds such as water-soluble compounds of zinc, lead and its compounds, "inorganic cyanogen compounds" except for complex salts and cyanate [Substance No. 108], "hydrogen fluoride and its water-soluble salt" [Substance No. 283], "boron and its compounds" [Substance No. 304]), use the quantity of metallic element, cyanogen, fluorine, or boron contained in each substance.

The MSDS lists the contents converted to metallic elements. Also refer to 4-2-6( [pIII-218](#)) for the conversion coefficient used for individual conversions.

Q38 Effluent containing hexavalent chromium used as a raw material is treated by the neutralizing sedimentation method, and then released. The treatment generates sludge containing trivalent chromium, which is disposed of. In such a case, how should we regard the quantity of hexavalent chromium and trivalent chromium handled?

A38 Regarding hexavalent chromium, the quantity used as a raw material (with specified substance at a mass percentage of 1% or more) should be regarded as the quantity handled. If the annual quantity handled exceeds 0.5 t, it meets the requirement of annual quantity handled. As for trivalent chromium, the quantity generated as sludge and disposed of is the quantity handled. If the annual quantity generated exceeds 1 t, it meets the requirement of annual quantity handled. In this manual, these quantities are used as annual quantities produced when making the calculations. Refer to 1-8 ( pIII-81) for an example of calculating the releases and transfers in such cases.

Q39 Hydrofluoric acid (solution of hydrogen fluoride) is used inside an establishment for processing the surface of metals, and a part of it is released to the atmosphere by vaporization. The government ordinance specifies hydrogen fluoride and its soluble salt as specified substances. How should we notify the quantity released in this case?

A39 Convert the value of hydrogen fluoride (Substance No. 283) in gaseous form generated into a fluoride element value, and notify it. Even if hydrofluoric acid (solution of hydrogen fluoride) is released or transferred as it is, convert into a fluoride element value, and notify it.

#### 2-4-2 Specified substances other than metals

Q40 In addition to bisphenol A epoxy resin (liquid only) (material No. 30) used as a raw material, bisphenol A epoxy resin (solid state) is used dissolved in a solvent. In such a case, do we have to submit notifications on the solid-state epoxy resin also?

A40 Since bisphenol A epoxy resin has been selected based on the toxicity data on the element resin in liquid form, only the one in the liquid state is subject to notification. Therefore, even if element bisphenol A epoxy resin in the solid state is dissolved in a solvent, it is not subject to notification unless the molecular weight of the resin changes into that of element resin in the liquid state.

Q41 Hydrazine has been specified as a class 1 designated chemical substance. Is “hydrazine hydrate” subject to notification?

A41 Hydrazine hydrate is made from hydrazine (Substance No. 253) and water mixed at any given percentage. The Law defines that “hydrazine” includes “hydrazine hydrate.” If hydrazine hydrate is manufactured or used, convert the quantity into that of hydrazine, and calculate the quantity handled or released.

Q42 Hydrazine derivatives such as hydrazine hydrochloride and hydrazine carbonate are used as deoxidants (as anticorrosive) in a boiler for removing vapors. These hydrazine derivatives are decomposed easily in the boiler and act as hydrazine, and some of them are released to the atmosphere or transferred in effluent. How should they be notified?

A42 Hydrazine hydrochloride, hydrazine carbonate, etc. are hydrazine derivatives and not hydrazine, so they are not the specified substances to be notified. However, since they are changed into hydrazine (hydrazine is actively generated) during the course of use, judge whether notification is required depending on the annual quantity of hydrazine generated as annual quantity handled.

Q43 How should we handle coplanar PCB when submitting notifications on “dioxins”?

A43 Article 4 of the Enforcement Regulations of the Law defines that businesses that have an obligation to assess the release of “dioxins” (Substance No. 179) (release and transfer in the case of businesses having facilities specified by the Law concerning Special Measures against Dioxins [hereafter referred to as the “Law on Dioxins”]) must calculate the release of dioxins and submit notifications based on actual measurements of the concentration of dioxins in exhaust gas or effluent made within the business establishment according to the Law on Dioxins. In such cases, “dioxins” are synonymous with dioxins specified by the Law on Dioxins, which includes coplanar PCB. Therefore, you must add the quantity of coplanar PCB, after conversion to TEQ, to the quantity of dioxins and submit notifications. Businesses that have an obligation to assess the release of “dioxins” and “PCB” (Substance No. 306) according to Article 4 of the Enforcement Regulations of the Law (businesses, general waste final treatment plants, or controlled type industrial waste final treatment plants that have sewage treatment plants specified by No. 13 of Table 2 of the Enforcement Regulations of the Law on Dioxins [businesses running waste treatment or industrial waste treatment business only]) must notify the release of coplanar PCB in addition to “dioxins.” “PCB” is designated as the mixture of every PCB isomer including coplanar PCB. Therefore, notify the assessed quantity of “PCB” as the mixture of every isomer. Coplanar PCB in “PCB” need not be converted to TEQ.

Businesses that have an obligation to assess the quantity of “dioxins” but do not have to assess that of “PCB” according to Article 4 of the Enforcement Regulations of the Law need not submit notifications on the pertinent coplanar PCB as “PCB,” even if “dioxins” actually measured at the facility within the business establishment contain coplanar PCB.

Q44 To what extent should we notify the substances generated or released unintentionally during business activities?

A44 If you have a specific requirement facility, notify the releases and transfers of the specified substances in the exhaust gas or effluent from the facility that must be measured according to other regulations.

Q45 We must enter an alternative name of substances, if any. For those having multiple alternative names, how should we fill out the form? In the case of simazine, “simazine or CAT” must be entered. Should we enter, “simazine,” “CAT” or “simazine or CAT?”

A45 You can enter any of those names.

### 2-4-3 Others

Q46 Might the list of specified substances to be notified be changed?

A46 At present 354 materials are specified as substances requiring notification by the law in consideration of toxicity and exposure. They will be reexamined according to the latest scientific knowledge and assessment of data on released quantities, thus materials may be added to and removed from the list in the future.

## 2-5 Assessment of the quantity handled

### 2-5-1 Assessment of the quantity manufactured

Q47 A petrochemical manufacturer accepts naphtha as a raw material, extracts a specified substance contained in it at a mass percentage of less than 1%, and delivers it as a product. In this case, how should we calculate the annual quantity of the specified substance handled?

A47 In this case, the specified substance is considered to be "manufactured". Therefore, judge whether notification is required based on whether the annual quantity of the specified substance manufactured is 1 t or more (0.5 t or more in the case of specific class 1 chemical substances).

Q48 If class 1 designated chemical substances (heavy metals such as mercury, etc.) contained in coal in trace quantities (lower than 1%) are released from a thermal power plant, should we include it in the "quantity manufactured" and in the quantity handled? How about the chloroform generated by bleaching kraft pulp?

A48 If mercury contained in coal, which is used as a raw material, is released from the boiler of a thermal power plant, the mercury already existing in the coal is separated from the coal physically and released from the boiler as a by-product, and mercury is not newly generated. Therefore, you need not include it in the handled quantity as "quantity manufactured."  
Oh the other hand, chloroform generated as a result of bleaching kraft pulp is assumed to be newly generated in the reaction process. Therefore, you must include it in the handled quantity as "quantity manufactured."

Q49 How should we assume the handled quantity in the case of etching of metals (such as copper plate)? Is it only the quantity of surface that melted, or the whole quantity including the base material?

A49 Since "water soluble copper salt (copper nitrate)" (material No. 207) is assumed to be newly manufactured by the reaction (etching) of copper and nitric acid, the quantity of copper nitrate converted to the value of copper, or the weight of copper that has eluted, must be assumed as the handled quantity.



## 2-5-2 Content of specified substances

Q50 What values should we use as the content of a substance?

A50 Refer to the MSDS (Material Safety Data Sheet) on raw materials, materials, etc. (including products). The ministerial ordinance (Ordinance No. 401 of the Ministry of International Trade and Industry of 2000) defines that MSDS must list the contents of specified substances to two significant digits. Use those values.

Q51 If a specified substance is contained in products as a mixture with other chemical substances, or if a specified substance is diluted with solvent, how should we make the calculations?

A51 Calculate the annual quantity of the specified substance handled by multiplying the annual quantity of the products containing the specified substance at a mass percentage of 1% or more (0.1% or more in the case of specific class 1 designated chemical substances) by the specified substance content in them.

Q52 Although the content of the specified substance (other than specific class 1 chemical substances) in the products handled is less than mass percentage of 1%, the total annual quantity handled is larger than the limit (1 t/year). Do we have to make a notification?

A52 If the content of the specified substance in the products handled is less than mass percentage of 1%, you need not notify it.

Q53 Do we have to notify the specified substances contained in petroleum fuels other than the ones listed in 4-2-3( pIII-200) (such as metallic compounds)?

A53 Irrespective of whether the substance is listed in the relevant table or not, notification may be required in some cases, if the specified substance is contained at a mass percentage of 1% or more (0.1% or more in the case of specific class 1 designated chemical substances).

**2-5-3 Requirements for quantities of raw materials or materials handled which need not be assessed**

Q54 Please give examples of quantities of raw materials or materials handled which need not be assessed.

A54 The following are quantities of raw materials or materials handled which need not be assessed.

- Products whose specified substance content is less than 1% (in the case of specific class 1 designated chemical substance: 0.1%) (low in content)
- Solid objects (excluding powder or particulate matters) (such as metal plates and pipes)
- Products used in tightly sealed state (such as dry-cell batteries)
- Products for general consumers (such as household detergents and insecticides)
- Recycled resources (such as metal chips and empty cans)

Refer also to [pI-24](#) and [pII-20](#).

Q55 Please give specific examples of products for general consumers.

A55 Products for general consumers are specified as “products provided mainly for use by general consumers” (Article 5 of the Enforcement Regulations of the Law [[→ pIII-301](#)]) distributed in a state packed in containers and labeled as “for general consumers,” which include detergents and pesticides for domestic use sold by retailers or supermarkets.

Q56 Do waste treatment services have to notify the releases and transfers of specified substances contained in waste they received?

A56 Since waste received does not meet the requirement of products whose specified substances must be assessed (raw materials or materials), waste treatment services need not assess the releases by being volatilized in the process of handling the waste.

For "Requirement of products according to the law", refer to 1-4-2([pII-20](#)).

Of the specified substances used for waste treatment and released from waste treatment facilities, the ones which must be measured as specified in other regulations must be notified by waste treatment services. Waste treatment services that have specific facilities designated by the Law Concerning Special Measurement for Dioxins must notify the quantity of Dioxins.

Q57 How should we handle TV picture tubes and fluorescent lamps?

A57 Judge whether they meet the requirement of the products under the Law. If the products are purchased and used only, they need not be

notified. If TV picture tubes are manufactured, in some cases the quantity of a specified substance used in the manufacturing process may need to be notified.

Q58 Does lighting equipment such as incandescent or fluorescent lamps satisfy the requirements of Article 5 of the Enforcement Regulations of the Law ([pIII-301](#))?

A58 If the pertinent lighting equipment is sold mainly to general consumers, it is regarded as “products provided mainly for use by general consumers,” which do not satisfy the requirements of Article 5 of the Enforcement Regulations of the Law. Even in the case where the pertinent lighting equipment is used by businesses, if a class 1 designated chemical substance is sealed in the vacuum tube of a fluorescent lamp only and is not released to outside, it is regarded as “products handled only in the state where class 1 designated chemical substance is sealed,” which do not satisfy the requirements of Article 5 of the Enforcement Regulations of the Law. If a class 1 designated chemical substance is contained in the glass section or the external metallic part, it is regarded as “products that do not change into the state other than solid, and do not release or evaporate specified chemical substances in the process of handling,” which do not satisfy the requirements of Article 5 of the Enforcement Regulations of the Law.

Q59 If we purchase semi-products and manufacture products by assembling the semi-products, in cases where electronic circuit boards are purchased and assembled into electric products, do we have to notify the specified substance contained in the semi-products?

A59 Judge whether you have to make a notification on the basis of whether the relevant semi-products meet the requirement of the products according to the Law (raw materials or materials).

Q60 We supply metals such as stainless steel to our customers in the form of products or as components of products (such as stud bolts and nuts), and the stainless steel contains chromium, nickel, and manganese. Do we have to notify those substances?

A60 As specified in Article 1, Chapter 2 of the Law ([pIII-264](#)), elements are included in chemical substances, and so the metallic elements chromium, nickel and manganese in stainless steel are included in specified substances as "chromium and trivalent chromium compounds", "nickel", and "manganese and its compounds". An establishment that manufactures stainless steel by using these metals or an establishment that manufactures products such as bolts and nuts from stainless steel ingot through the fusing process is considered to have used the specified substances, chromium, nickel and manganese. If the number of full-time employees of the establishment is 21 or more, and the annual quantity of each specified substance handled by the establishment is

1 t or more, then the releases and transfers of specified substance must be notified.

On the other hand, if stainless steel bolts and nuts are used as parts, they are not considered to meet the requirement of products specified by Article 5 of the enforcement regulations ( [pIII-268](#)). So, establishments that purchase such parts and handle them as components of manufactured products do not have to make a notification.

Regarding the MSDS, if bolts and nuts are used as components by an establishment and they are not processed through fusion or the like, they do not meet the requirement of the products, thus MSDS need not be submitted. On the other hand, since ingot is usually processed through fusion by the establishment, it meets the requirement of products, and so MSDS must be submitted.

Q61 If fabrics coated with flame retardant such as antimony and its compounds (material number 25) are purchased to manufacture sheets for automobiles, how should we judge whether we have to make a notification?

A61 Judge according to whether the fabrics meet the requirement of products.

Q62 Old devices used in the establishment are handed back to their manufacturer. In this case do we have to examine the components of the chemical substances contained in them and notify them?

A62 Since machines have specific shapes, they do not meet the requirement of products, so they need not be included in the annual quantity of specified substances handled.

Q63 Incineration ash is generated from sludge in a sewage water treatment facility. Ninety percent of the incineration ash is used as a raw material for baked bricks inside the establishment, and the remaining ten percent is transferred to a different establishment and used as a raw material for cement there. The quantity of Dioxins contained in the incineration ash is measured. Do we have to notify the releases and transfers from the sewage water treatment facility?

A63 Even if Dioxins are contained in incineration ash generated inside the establishment, if they are used as raw materials inside the same establishment, it is not considered as a release to the environment or transfer of the substance contained in waste. Therefore, you need not include it in the release and transfer. If the incineration ash is handed over to another establishment at no charge or the cost for treatment is paid to the establishment, and it is used as a raw material, then it is considered that the sewage treatment facility is discharging it as waste. Therefore, the facility must include the quantity of Dioxins contained in the incineration ash in the "Off-site transfer in waste".

Q64 Waste capacitors containing PCB are stored in the storage. Do we have to notify this?

A64 If it is a waste, it need not be notified.

Q65 Welding is done inside the establishment using welding core wire and base metal. Do we have to notify the releases and transfers? The number of full-time employees is 21.

A65 The welding core wire and base metal used in the welding process are fused in the process of handling. If the specified substance is contained at a mass percentage of 1% or more (0.1% in the case of specific class 1 designated chemical substance), and the annual quantity of the substance handled is 1 t or more (0.5 t in the case of specific class 1 designated chemical substance), you must notify the releases and transfers of the substance.

Q66 If we perform bonding by welding a stainless steel plate that contains chromium or nickel, should we include the quantity contained in the whole plate or only in the welded part into the quantity of the substance handled?

A66 When welded, the stainless steel plate becomes a “state other than solid” in the process of handling. Therefore, if a class 1 designated chemical substance is contained at the mass percentage of 1% or higher (0.1% or higher in the case of specific class 1 designated chemical substances), the product satisfies Article 5 of the Enforcement Regulations of the Law (→ [pIII-301](#)). Since the quantity of applicable substance handled includes the whole quantity contained in the product, add the quantity of chromium contained in the whole stainless steel plate as “chromium and its tervalent chromium compounds,” and the quantity of nickel as “nickel” (converted to nickel) to the quantity handled.

Q67 How should we regard soldering?

A67 If the solder is used for soldering work and it contains lead at a mass percentage of 1% or more, it meets the requirement of the products specified in Item 1, Article 5, Chapter 2 of the Law (→ [pIII-301](#)), since it becomes liquid while it is being handled. Calculate the annual quantity handled to judge whether notification is required.

Q68 "Glass" is not listed on the specified substance list. How should we regard glass? How should we make calculations if a specified substance such as a metallic compound is contained in glass?

A68 Since "glass" is not the name of a chemical substance, "glass" itself is not the target of calculating the releases and transfers. However, if a specified substance is contained in the glass used as a raw material at a mass percentage of 1% or more (0.1% or more in the case of specific class 1 designated chemical substances), and fusion is included in the handling process, then the releases and transfers must be notified. If the glass purchased is incorporated in products without fusing it, notification is not required.

Q69 If an additive containing a specified substance is kneaded into pellets to be manufactured, is notification of the quantity released or transferred necessary?

A69 Judge whether notification is required according to the content of the specified substance in the additive and the annual quantity handled. If the specified substance contained in the additive does not undergo reaction but exists in pellets, it is required to judge whether the MSDS should be provided when pellets are delivered to other businesses.

Q70 Do we have to include the quantity of a specified substance contained in a coating material of electric wires used for fabricating plastics made from resin pellet into the handled quantity?

A70 A block of plastics made from resin pellet changes into a completely different shape when melted by heat during extrusion processing, resulting in a "state other than solid." Therefore, it fits into the case where the quantity of raw materials or materials used must be assessed. If a class 1 designated chemical substance is contained at the mass percentage of 1% or higher (0.1% or higher in the case of specific class 1 designated chemical substances), you have to include it in the handled quantity. The state of metals that undergo rolling or casting processing is categorized as "state other than solid" if it is clear that heating has dissolved the metal. If it is only bent or deformed by applying pressure, it is regarded as not having entered the "state other than solid."

Q71 Parts such as cutting tools wear during use. Do we have to include the quantity into the handled quantity as “those that enter a state of powder or particle?”

A71 Article 5 of the Enforcement Regulations of the Law ( [pIII-301](#)) defines products that “do not enter a state of powder or particle” as “those that are not assumed to release specified substances contained in them as a result of entering the state of powder or particle.” Parts such as cutting tools, which wear during use, will be replaced after a fixed time, and a significant amount of the substance contained in them is assumed to have been released to the environment. Therefore, the whole quantity of class 1 designated chemical substances contained in tools must be included in the handled quantity as those that “enter the state of powder or particle.”

Q72 When substances in the state of powder or particle are generated during handling by a business as a result of polishing or cutting metals or plastics, what should we count as the handled quantity?

A72 A significant quantity of specified substances contained in products in solid state that will be polished or cut during the handling process is assumed to enter the “state of powder or particle” and be released into the environment. Therefore, if a class 1 designated chemical substance is contained in the pertinent product at the mass percentage of 1% (0.1% in the case of specific class 1 designated chemical substances), it fits into the category of products that satisfy the requirements of Article 5 of the Enforcement Regulations of the Law (→ [pIII-301](#)). (If the release to the environment is assumed to be very small such as in the case of cutoff, the requirements of Article 5 of the Enforcement Regulations of the Law are not satisfied.) Since the quantity of specified substance handled must include all the quantities contained in products, include the whole quantity of base materials such as metals or plastics polished or cut.

#### 2-5-4 Other questions on the assessment of handled quantity

Q73 Because we used merchandise in stock that had been received prior to the relevant year, the quantity of the specified substance released in the relevant year exceeded the quantity actually received. Even if the stock from the previous year is used, do we have to include the quantity in that of the relevant year?

A73 Even if merchandise in stock is used, include the quantity in that of the substance handled in the relevant year.

Q74 Scrap pieces of molding containing a specified substance are generated in the establishment and reused as raw materials inside the establishment in the same fiscal year. Do we have to include the quantity of the specified substance contained in the scrap pieces of molding recycled in the annual quantity handled?

A74 In this case, do not include the quantity in the annual quantity handled, otherwise the reused quantity will be counted twice. The quantity is already included in the annual quantity handled.

Q75 A business establishment that maintains airplanes (runs a machine maintenance business) has an X-ray room for health checks of crew and employees, where developing fluid containing a specified substance is used. Do we have to include the quantity in the annual quantity handled?

A75 Fluid for developing X-rays used for health checks of crew or employees is not used for "business" purposes. Therefore, you do not have to include it into the quantity handled.

Q76 How should we count the handled quantity if chlorofluorocarbon is extracted in an automobile maintenance business? If the extracted chlorofluorocarbon is refilled in another device, how should we count the handled quantity?

A76 With regard to chlorofluorocarbon (CFC, etc.) handled in automobile maintenance businesses, the sum of the purchased quantity and the whole quantity recovered (quantity actually extracted) is regarded as the quantity handled. If the extracted chlorofluorocarbon is refilled, do not add the refilled quantity to the quantity handled to prevent double counting.



Q77 We are running a manufacturing business, and in addition to the specified substances contained in raw materials we handle, we produce substances which are used in pesticides to be sprayed on lawns or in detergents used in restaurants located inside the establishment. Do we have to include those in the quantity handled? How should we regard paint on factory walls or gasoline for vehicles that we own?

A77 Specified substances handled by a business for its own business operations must be included in the quantity handled, but the quantity handled in association with business operations need not be included. Therefore, the pesticides or detergents stated need not be included in the quantity handled. Paint on factory walls need not be included in the quantity either, because it is generally used for upkeep of buildings. On the other hand, if the manufacturing equipment itself is painted to prevent corrosion, the quantity must be included in the quantity handled. Gasoline for the vehicles used inside the establishment need not be included in the quantity handled, if the vehicles are also used on public highways. On the other hand, gasoline for vehicles used exclusively inside the establishment such as forklifts must be included in the quantity handled.

## 2-6 Calculation of release/transfer

### 2-6-1 Classification for notification of release/transfer

Q78 If a business (establishment A) is releasing waste to another establishment in the same business (establishment B) that is located outside the premises of establishment A, how should the quantity released or transferred be notified?

A78 The quantity of the specified substance contained in waste that is transferred from establishment A to establishment B should be included in "Off-site transfer in waste" of establishment A.

Q79 Waste oil containing trichloroethylene is handed over to a recycling service. Do we have to make a notification as "Off-site transfer in waste"?

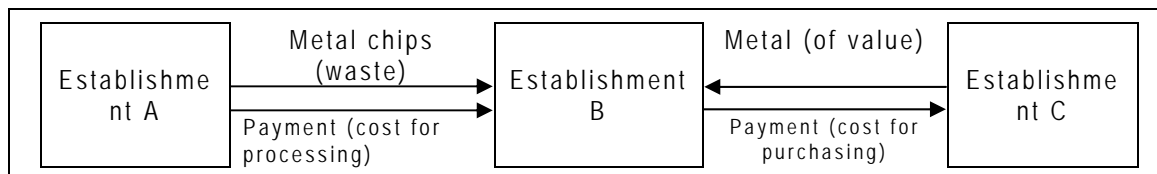
A79 If the waste oil is sold to a recycling service, it is considered as the quantity of products discharged, so you need not notify it. However, if it is handed over at no charge, you must make a notification by including the quantity in "Off-site transfer in waste".

Q80 Establishment A is handing metal chips generated over to an establishment that manufactures metal products (establishment B) and paying for the cost of treatment. Establishment B processes the metal chips into metals of value and sells them to another establishment (establishment C). In this case, which establishment should notify which substance? Does the limit of annual quantity handled apply to the specified substance contained in the waste which establishment B is receiving? (Establishments A, B, and C each have 21 or more full-time employees.)

A80 If establishment A is included in the group of businesses that have to make a notification, and the specified substance contained in metal chips is one which must be notified, the quantity of the specified substance contained in the metal chips handed over to establishment B must be notified as the "Off-site transfer in waste". Since the metal chips handed over to establishment B are categorized as waste, establishment B does not have to include the quantity of the specified substance contained in the metal chips in the annual quantity of the specified substance handled. However, establishment B is manufacturing metals. If a metal manufactured by establishment B is a specified substance itself, and the annual quantity of the substance is 1 t or more (0.5 t or more in the case of specific class 1 designated chemical substances), then the annual releases and transfers must be notified. If the metals manufactured are products that contain a specified substance at a mass percentage of 1% or more (0.1% or more in the case of specific class 1 designated chemical substances), establishment B is considered to be using products that contain a specified substance.

So, if the annual quantity of products used is 1 t or more (0.5 t or more in the case of specific class 1 designated chemical substances), then the releases and transfers must be notified.

Since establishment C is purchasing metal products, it must check the usage status on the basis of the concept of handling specified substances, and then calculate the annual quantity handled to judge whether the releases and transfers must be notified.



**Q81** If metal chips, etc. are handed over to another business for treatment, for which a fee is paid in addition to the transportation charge, should we regard the metal chips, etc. as a recycling resource or as waste?

**A81** When metal chips are handed over to another business for treatment, for which a fee is paid in addition to the transportation charge, it is regarded as “waste” designated by the Waste Disposal and Public Cleansing Law. Therefore, the chips are regarded as “waste” under the Law in principle.

**Q82** Business A has three business establishments, “a,” ”b” and “c.” The waste liquid generated in business establishments “b” and “c” is taken to business establishment “a,” where it is treated and then discharged to surface water. How should we calculate the release/transfer of waste liquid from each business establishment?

**A82** If waste liquid generated in business establishments “b” and “c” is transferred directly to the wastewater treatment plant of business establishment “a” through a pipeline, etc. and then released from there, report it as “surface water discharge” from business establishments “b” and “c.” In this case, business establishment “a” does not have to notify the quantity released from business establishments “b” and “c.”

On the other hand, if the waste liquid is not directly transferred through a pipeline, etc., the waste liquid generated in business establishments “b” and “c” is considered as “waste” under the Law. Therefore you have to submit notifications as the “transfer” from business establishments “b” and “c.” If business establishment “a” has a waste treatment plant, the release must be notified, including the waste liquid released from business establishments “b” and “c” according to Article 4 of the Enforcement Regulations of the Law.

Q83 If a specified substance is released to an agricultural channel, is the destination to which the substance is released a "public water area"?

A83 "Public water area" is defined as "rivers, lakes, ports, coastal sea area, and other water area used for public purposes, and public channels, channels for irrigation, and other channels used for public purposes that are connected to those water areas". Since agricultural channels fall into the category of "channels for irrigation", the release to them must be notified as "surface water discharge".

Q84 Metal fumes are released to air in the process of welding. Strictly speaking, they are released to air, and then as they cool down, they infiltrate into walls, floors and land, etc. within the business establishment. Should we assume that the whole quantity has been emitted to air in such a case?

A84 In principle, the release must be assessed by the media (air, water or land) to which substances are released. In the above case, however, it is impossible to assess the exact quantity released to each medium, and so you may assume that the whole quantity has been emitted to air.

Q85 In which category should metallic compounds released from combustion facilities be notified, as air emission or as land emission?

A85 Notify metallic compounds released from smokestacks of combustion facilities as air emission. Land emission means that a specified substance is directly released to land through leakage or penetration to underground.

## 2-6-2 Calculation using actual measurement values

Q86 In calculating the quantity of waste transferred, the content of a specified substance in waste is required. If actual measurement value is not available, how can we make the calculations?

A86 You can use the documented data from similar facilities, or the values obtained from experience in waste generating processes.

Q87 Can we use the result of elution tests to assess the quantity of heavy metals such as chrome contained in incineration ash generated from a waste incinerator?

A87 Elution tests are carried out to measure the quantity of heavy metals eluted from incineration, with the pH set to a certain value (5.8 or over up to 6.3, for waste to be disposed of in landfills). Therefore, the test result is not the same as the quantity of heavy metals contained in incineration ash, so it is not appropriate to use the value for calculations.

Q88 If the direct measurement data of the removal efficiency or the concentration of a specified substance in effluent from a wastewater or exhaust gas treatment facility are not available, how should we make the calculations?

A88 Estimate the latent release from a handling process by using mass balance or based on the values obtained from experience, and then use those values and the removal efficiency listed in 4-3-6( p III-283) to make calculations. Note that there may be a case where the removed quantity becomes equal to the quantity contained in waste.

Q89 In calculating the quantity released to public water area by using the measurement data of a specified substance in effluent, how should we make the calculations if the measurement value is the same as or higher than the minimum limit of detection and lower than the minimum limit of determination, or lower than the minimum limit of detection?

A89 If the measurement value is the same as or higher than the minimum limit of detection and lower than the minimum limit of determination, regard it as one half of the minimum limit of determination. If the value is lower than the minimum limit of detection, regard it as zero in the calculations. Refer to “Notes of ( pII-58). ”

Q90 The Law on Dioxins defines that the quantity of dioxins in exhaust gas and effluent must be assessed by the quantity of specified substances. Specifically, if the quantity is the same or larger than the minimum limit of determination, the value must be converted to TEQ. If the quantity is less than the minimum limit of determination, it is regarded as 0 and converted to TEQ, and then those values must be summed up. Meanwhile, Part II 2-1-6 (→ pII-58) and Q89 define that “if the measurement is less than the minimum limit of detection (N.D.), it is regarded as 0, and if it is the same or larger than the minimum limit of detection and less than the lower limit of determination, it is regarded as 1/2 of the minimum limit of determination.” Which concept should we follow in submitting PRTR notifications?

A90 Article 4 of the Enforcement Regulations of the Law defines that businesses that have an obligation to assess the release of “dioxins” (Substance No. 179) must calculate the release of dioxins (the release and transfer in the case of businesses having specific facilities defined by the Law on Dioxins) using the actual concentration of dioxins in exhaust gas or effluent measured within the business establishment according to other laws such as the Law on Dioxins, and submit notifications.  
In this case, you can use the measurement values on the Law on Dioxins to calculate the release required by the Law on Promotion of Assessment and Control of Chemical Substance Release. Therefore, the part of this manual described above does not apply to specific facilities, etc. defined by the Law on Dioxins, and you need not re-calculate the quantity of dioxins for PRTR notifications.

### 2-6-3 Calculation of release etc. in various processes

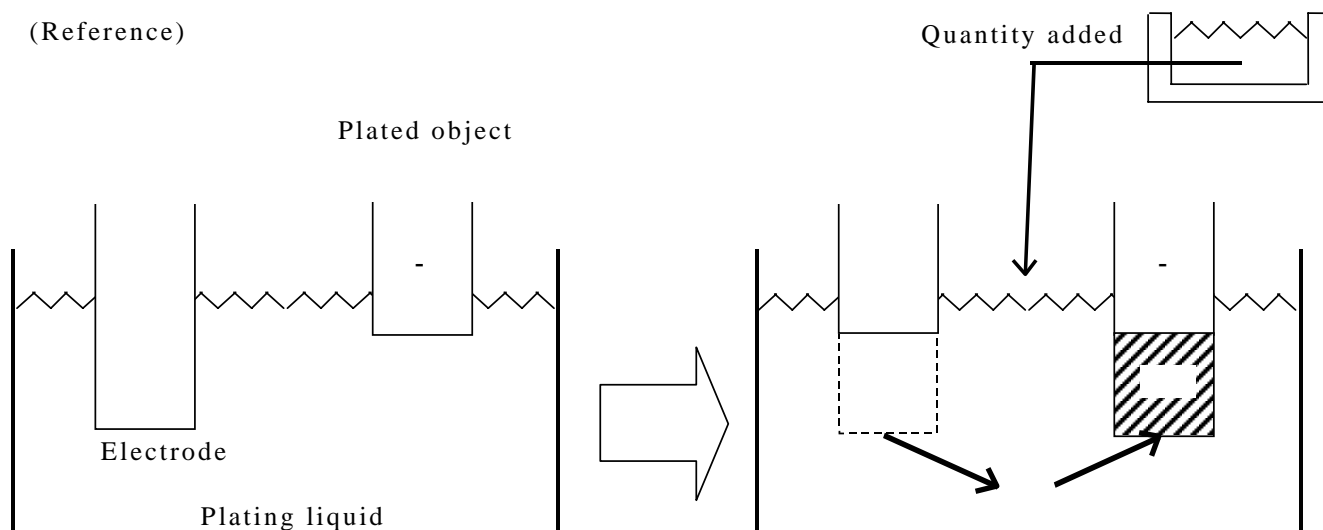
Q91 In a process such as plating, the quantity of a specified substance attached to individual products (the quantity discharged as products) cannot be assessed easily. How should we make the calculations in such cases?

A91 Calculate the quantity discharged as products by using the average quantity of the specified substance adhered to products per 1 t of the products.

Q92 In a plating process using plating liquid which is a nickel compound (such as nickel sulfate), how can we calculate the annual quantity used?

A92 With regard to “nickel,” include the quantity of nickel equivalent to the consumption of the electrode (anode) into the annual quantity handled. With regard to “nickel compounds,” regard the quantity dissolved from the nickel electrode (anode) as the “quantity manufactured,” and the quantity of nickel compound fed to the electrolytic cell as a result of replacing or supplying additional plating liquid as the “quantity used,” convert those values into that of nickel, and then include them in the calculation of the annual quantity handled.

Refer to Part III 1-8 (→ [pIII-81](#)), which gives an example of calculating the release from the plating process based on this concept.



Quantity of nickel handled: Consumption of nickel electrode(= )

Quantity of nickel compound handled: Nickel compound in plating liquid additionally fed( )  
 + nickel compound that has eluted (manufactured) from the electrode( )

(Balance of the quantity of nickel: = = )

Q93 A recycling device adopting the activated carbon adsorption method is used for treating exhaust gas and effluent. The specified substance adsorbed to activated carbon is recycled and reused inside the establishment. How should the calculations be made in this case?

A93 When a specified substance is recycled and reused, do not calculate the "quantity contained in waste from exhaust gas or effluent treatment" but calculate the release by using mass balance. (This prevents miscalculation caused by adding the quantity recycled and reused to "quantity contained in waste" or subtracting the quantity twice.)

Q94 How can we assess the quantity of a specified substance released from junctions or flanges of pipelines to the air?

A94 It is considered difficult to assess the release from junctions or flanges of pipelines to the air individually. So, use the mass balance method of subtracting the quantity discharged as products, the quantity contained in waste, release to water from the annual quantity handled to calculate the overall release from the manufacturing plant to the air. Then assess the quantity on the assumption that they are included in the quantity calculated. Refer to 1-2( [pIII-21](#)).

Q95 Toluene is used as a combustion promoter for an organic solvent incineration facility. Can we consider the whole quantity of toluene as changed into carbon dioxide and water?

A95 The removal efficiency varies depending on incineration equipment or incineration conditions, so the whole quantity of toluene is not always decomposed. If the removal efficiency can be obtained from the manual of the equipment or other documents, or from similar examples, use that value when making the calculations. If the removal efficiency cannot be obtained, you may use the removal efficiency of 100%. However, try to obtain the actual removal efficiency in some way.

Q96 How should we calculate the releases and transfers of a volatile specified substance from the drying process of detergent manufacturing?

A96 Since the excessive volatile component in detergent manufactured is considered to be removed by drying, calculate the value released to the air on the assumption that the whole quantity of volatile component contained in detergent manufactured in the manufacturing process before the drying process is air emission.

Q97 How should we calculate the releases and transfers while reagents are being filled in bottles or cans?

A97 Notify the quantity volatilized while reagents are being filled in containers as "air emission". If the reagents spilled from containers are washed away and the effluent is released to public water area, calculate the value as "surface water discharge". If the effluent is released to sewage works, calculate the value as "transfer to sewage" and notify the value. If the spilled reagents are collected and handed over to a waste treatment service, calculate the value as "off-site transfer in waste" and notify the value.

Q98 How should we calculate the releases and transfers of a specified substance from a research laboratory?

A98 In research laboratories, there are typically combinations of multiple processes such as reaction processes and processes using solvents. Therefore, refer to the processes explained in "1" (pIII-2)) that is applicable to the case, or the basic calculation method described in "II" (p43) to calculate the releases and transfers of specified substances.



Q99 From the machinery repair industry, specified substances are released or transferred during painting or adhesion work. It is extremely difficult to assess individual releases and transfers, because there are many working methods depending on the sections repaired or the degree of damage. How should we calculate the releases and transfers?

A99 If it is not feasible to calculate the releases and transfers from individual working processes, calculate the overall releases and transfers from the establishment by combining the mass balance method and other methods.

Q100 Do we have to notify the releases and transfers of specified substances resulting from business activities carried out outside the establishment (such as installation work on a customer's site)?

A100 You need not notify the releases and transfers resulting from business activities performed outside the establishment.

#### **2-6-4 Assessment of the release from automobile/refueling facilities**

Q101 We own automobiles, and fuels for the automobiles contain a specified substance at a mass percentage of 1% or more. Is notification of the release from automobiles necessary?

A101 Specified substances released from automobiles are to be assessed by the government. Notification is not required.

Q102 We own ships. Do we have to notify the specified substance released from the ships?

A102 As in the case of automobiles, specified substances released from ships are to be assessed by the government. Notification is not required.

Q103 We have a facility to feed gasoline inside our premises. Is notification of the release from the facility necessary?

A103 If the establishment meets the requirement of industrial classification and the number of full-time employees, it must judge whether notification is required, because gasoline contains specified substances such as benzene, toluene, xylene, and ethyl benzene. Regarding benzene, if 0.5 t or more is handled annually, it must be notified.

Q104 How should we calculate the quantity released from vehicles used only within the premises (such as fork lifts)?

A104 With regard to vehicles that are operated with gasoline engines (such as fork lifts, airport service vehicles, delivery vehicles, and off-road vehicles), calculate the quantity of xylene, toluene, and ethylbenzene, if the annual quantity released from the business establishment as a whole, including applications other than gasoline as fuel for fork lifts, etc. (such as paints), is 1t or larger. Calculate the release of benzene if its annual quantity handled is 0.5t or larger. With regard to the vehicles operated with light oil (diesel engine) or LPG fuels, the release need not be assessed because the content of the class 1 designated chemical substances in those fuels is less than 1%.

< Example of Emission Factors >

Name of class 1 designated chemical substance subject to notification	Quantity released per rated engine output of 1kW (or 1PS) or 1 hour of use by substance			
	(Unit: mg/kW·h)		(Unit: mg/PS <sup>*1</sup> ·h)	
	Not provided	Provided with exhaust gas reduction equipment <sup>*2</sup>	Not provided	Provided with exhaust gas reduction equipment <sup>*2</sup>
Ethylbenzene (Ordinance No.: 40)	23.5	12.8	17.3	9.4
Xylene (Ordinance No.: 63)	44.9	24.4	33.0	17.9
Toluene (Ordinance No.: 227)	132.7	71.9	97.6	52.9
Benzene (Ordinance No.: 299)	49.2	26.7	36.2	19.6

\*1: HS: Horse power, 1HS = 0.7355kW

\*2: Provided with exhaust gas reduction equipment such as oxidation catalyst, EGR or three-way catalyst. For example, the quantity of benzene released when ten fork lifts not provided with exhaust gas reduction equipment are operated with an engine of rated output of 50kW (36.8PS) for 1,000 hours per year is calculated as follows.

$$50(\text{kW}) \times 1,000(\text{h}) \times 49.2(\text{mg}/\text{kW}\cdot\text{h}) \times 10(\text{fork lifts})$$

$$[36.8(\text{PS}) \times 1,000(\text{h}) \times 36.2(\text{mg}/\text{PS}\cdot\text{h})] \times 10(\text{fork lifts})]$$

$$= 24,600,000\text{mg} = 24,600\text{g} = 25\text{kg}$$

Q105 Gas stations fall into the category of fuel retailers specified by the government ordinance. What are the substances whose released quantities are to be assessed, and how should we make the calculations?

A105 Benzene, toluene, xylene, ethyl benzene, etc. contained in gasoline are the substances to be notified (see 4-2-3( pIII-200)). For calculation of the quantity released from storage tanks, see the example shown in 1-1( pIII-4). Refer also to the manual issued by the Petroleum Association of Japan and Zensekiren (PRTR and Fueling Stations).

Q106 Do we have to notify the releases while specified substances are being transported?

A106 Since the releases and transfers resulting from activities performed outside the establishment need not be notified, you need not notify the releases and transfers while the substances are being transported.

## 2-6-5 Others

Q107 If actual measurement data are not available when comparing the quantity of the specified substance released to the air and to water, judgment is to be made for the medium to which the larger quantity is released. How can we make a judgment?

A107 If the medium to which a larger quantity is released is not known at all, refer to 4-3-7 ( [pIII-288](#)). Also see 4-2-6 ( [pIII-227](#)) for Henry's constant.

Q108 Establishment A is a foreign-affiliated enterprise, and assesses the quantity by the year. Is it possible to make a notification per year?

A108 The Law requires that notification be made per fiscal year. So, establishment A must make notifications per fiscal year.

Q109 How should we enter the names of rivers, etc. to which specified substances are released in the notification form?  
If effluent from a business establishment is released to two or more rivers, how should we enter the names of the rivers?

A109 For the names of rivers to which substances are released, refer to “Names of surface water (rivers, lakes, seas, etc.) for PRTR notification,” which lists the names to be entered by prefecture, on the website of the Ministry of Economy, Trade and Industry or the Ministry of the Environment.  
If the effluent from a business establishment is released to two or more rivers, enter the name of the river to which the larger quantity is released.

Q110 The notification form does not have a field for “annual quantity handled”. Don’t we have to notify the annual quantity handled that has been assessed when calculating the release?

A110 You do not have to report it. However, if you do not assess the annual quantity handled, you cannot judge whether you fit into the category of businesses subject to notification. It is therefore very important to assess the annual quantity handled.

Q111 The annual quantity handled exceeds 5t, but little has been released to the environment, and we have entered the value “0.0” in the notification form. Is notification required in such a case?

A111 Even if designated businesses obtain “0.0” when calculating the release or transfer, they must enter “0.0” in the notification form and submit it.

## 2-7 Specific requirement facilities

Q112 What are the specific substances that must be notified by waste management contractors having general or industrial waste treatment facilities or sewage work services having sewage treatment plants?

A112 Sewage work services must notify “class 1 designated chemical substances subject to water quality inspection under the Sewage Water Law” (No. 1 “d” of Article 4 of the Enforcement Regulations of the Law). Waste management contractors must notify “class 1 designated chemical substances subject to water quality inspection under Paragraph 1, Article 14 of the Clean Water Law” (No. 1 “e” of Article 4 of the Enforcement Regulations of the Law). Specifically, they must submit notifications on the 29 substances listed on the next page and dioxins. Note, however, that sewage treatment plants that have been designated as specific facilities under the Law on Dioxins only must submit notifications on dioxins. “Phenols,” which have been designated as substances subject to water quality inspection, include various substances such as “phenols,” “cresol” and “pyrocatechol.” As these substances cannot easily be distinguished from each other, notification on them is not required. Substances added to those subject to water quality inspection at the discretion of local prefectural governments in addition to the following 29 substances and dioxins need not be notified.

1	Zinc compounds (water-soluble)	175	Mercury and its compounds
37	O-ethyl=O-4-nitrophenyl=phosphonothioate	178	Selenium and its compounds
		200	Tetrachloroethylene
60	Cadmium and its compounds	204	Tetramethylthiuram disulfide
68	Chromium and chromium(III) compounds	207	Copper salts (water-soluble, except complex salts)
69	Chromium(VI) compounds	209	1,1,1-trichloroethane
90	2-chloro-4,6-bis(ethylamino)-1,3,5-triazine	210	1,1,2-trichloroethane
		211	trichloroethylene
108	Inorganic cyanide compounds (except complex salts and cyanates)	230	Lead and its compounds
		252	Arsenic and its inorganic compounds
110	S-4-chlorobenzyl N,N-diethylthiocarbamate	283	Hydrogen fluoride and its water-soluble salts
112	Tetrachlorometane		
116	1,2-dichloroethane	299	Benzene
117	1,1-dichloroethylene	304	Boron and its compounds
118	cis-1,2-dichloroethylene	306	Polychlorinated biphenyls
137	1,3-dichloropropene	311	Manganese and its compounds
145	dichloromethane		

Q113 With regard to specific requirement facilities, we are voluntarily performing chemical analyses of the substances in sludge in addition to those specified by other regulations (those subject to water quality inspection). Must we submit notifications on the release of specified substances assessed in this way? (Or can we submit notifications?)

A113 You do not have to submit notifications on substances other than whose release is expected to be assessed. (Do not submit notifications.)

Q114 We release a class 1 designated chemical substance, whose release we do not actually measure even though we are required to do so. In such a case, do we have to submit notifications?

A114 Class 1 designated chemical substances whose release is required to be measured must be notified under the Law even if measurement is not actually performed. Assess the quantity released according to one of the procedures designated in Article 2 of the Enforcement Regulations of the Law (→ [pIII-301](#)), and submit notifications.

Q115 A business establishment that has a general waste treatment facility does not release effluent. Or a general waste incineration plant has been built so as not to discharge effluent. Do they have to submit notifications, with “0.0” entered for the measurement items specified by the Law?

A115 If measurement is not required by the regulations listed in No. 1 “e” of Article 4 of the Enforcement Regulations of the Law, business establishments as shown above are not required to submit notifications with “0.0” entered for the pertinent item under the Law.

Q116 The Sewage Water Law and the Clean Water Law designate manganese and its compounds (Substance No. 311) that are soluble in water only as items to be assessed, which does not coincide with the range of class 1 designated chemical substances (Note). Can we use the result of measurement of “manganese soluble in water” directly to calculate the release of “manganese and its compounds?”

A116 Yes, you can. (The government is now conducting sampling checks and considering providing fixed factors.)

**NOTE:** The same applies to the following substances.

- “Zinc and its water soluble compounds” (Designated as “Zinc and its compounds” by the Law)
- “Chrome and tervalent chromium compounds” (“Chrome and its compounds”)
- “Inorganic cyanogen compounds (excluding complex salt and cyanate)” (“Cyanogen compounds”)
- “Mercury and its compounds” (“Mercury and alkyl mercury and other mercury compounds”)
- “Water soluble copper salt (excluding complex salt)” (“Copper and its compounds”)
- “Arsenic and its inorganic compounds” (“Arsenic and its compounds”)
- “Hydrogen fluoride and its water soluble salts” (“Fluorine compounds”)

Q117 The Law defines the element EPN as a class 1 designated chemical substance that is subject to notification. The Sewage Water Law and the Clean Water Law, meanwhile, require that parathion, methyl parathion, methyl demeton and EPN be measured and the sum of those substances be regarded as “organic phosphorous compounds.” An external service company has been consigned to undertake the measurement, and an environmental measurement certificate has been issued for organic phosphorous compounds and not for element EPN. In such a case, do we have to ask the measurement service company for the result of measuring element EPN to calculate the quantity released?

A117 You can use the measurement value of “organic phosphorous compounds” to calculate the quantity of “EPN” (Substance No. 37) released. (The substance you should notify is “EPN” and not “organic phosphorous compounds.”)

Q118 The office memo issued by the Sewerage Department of the Ministry of Land, Infrastructure and Transport (July 6, 2001) describes sewage service companies as follows. “Those that do not manufacture or use class 1 designated chemical substances, not connected to business sites that fall under the category defined by Article 3 of the Enforcement Regulations of the Law (→ pIII-300) judged from the notification submitted based on Clause 2, Article 11 of the Sewage Water Law, and into which no class 1 designated chemical substances are expected to flow, do not fit into “those expected to generate and release class 1 designated chemical substances as a result of business activities” defined by Clause 5, Article 2 of the Law (→ pIII-298), and therefore are not designated as businesses that handle class 1 designated chemical substances. Specifically, what kinds of businesses are excluded?”

A118 Sewage treatment plants that have been proven to satisfy both of the following conditions based on the notification submitted by the sewage works users according to the definition of Clause 2, Article 11 of the Sewage Water Law do not have to submit notifications according to “d” of Clause 1, Article 4 of the Enforcement Regulations of the Law (→ pIII-301).

Not connected to business establishments that fit into the category defined by Article 3 of the Enforcement Regulations of the Law. (Determined based on the list of sewage works users submitted. If it includes a business of unknown category, regard it as running a business subject to notification.)

Class 1 designated chemical substances are not expected to flow in, which means that the water quality inspection performed in the past has detected no class 1 designated chemical substances.

Note that if a sewage work business uses a class 1 designated chemical substance and the annual quantity handled exceeds 1t (5t in the case of specific class 1 designated chemical substances), notification is required. Based on the above concept, rural community sewerage and combined type Jokaso that mainly treat domestic effluent do not have to submit notifications, either.

Q119 If the analysis, which has been consigned to another organization, certifies that the quantity is “the same or lower than the minimum limit of determination, //mg,” do we have to calculate the quantity using “1/2 of the minimum limit of determination?” Or can we use “0” as for calculating dioxins?

A119 Refer to the description of pII-82. You can adopt the procedure defined by the Law on Dioxins with regard to dioxins.

Q120 Do general waste treatment facilities set up by local municipalities fit into “general waste treatment facilities defined by “e” of Clause 1, Article 4 of the Enforcement Regulations of the Law” (→ pIII-301)?

A120 General waste treatment facilities set up by local municipalities fit into “general waste treatment facilities defined by “e” of Clause 1, Article 4 of the Enforcement Regulations of the Law.” “General waste treatment facilities” referred to by “e” of Clause 1, Article 4 of the Enforcement Regulations of the Law, mean “general waste treatment facilities” and not “general waste treatment facilities that must ask for permission of operation” defined by Clause 1, Article 8 of the Waste Disposal and Public Cleansing Law. Therefore, general waste treatment facilities set up by local municipalities do not have to ask for permission according to Clause 1, Article 8 of the Waste Disposal and Public Cleansing Law (Refer to Clause 3, Article 9 of the Waste Disposal and Public Cleansing Law), but are assumed to fit into the definition of “general waste treatment facilities” in the pertinent clause.

Q121 If a special local public entity that runs a waste treatment business consigns collection and transport of waste to a private enterprise, does it have to include the number of employees of the private enterprise into the calculation of full-time employees of the public entity?

A121 If the responsibility of administering consigned business is borne by the public entity, the number of those engaged in the consigned business must be included in the calculation of full-time employees of the public entity. Refer to Q12 for consignment relations.



Q122 The table “Summary of PRTR notification classification” on page 3 of the “Guideline for PRTR notification (general waste treatment business)” created by the waste department, waste/recycle measure division of the Minister’s Secretariat of the Ministry of the Environment states that if 29 substances from general waste incineration facilities and general waste final treatment plants are released to sewage, notification is not required. Does the Enforcement Regulations of the Law also give the same definition?

A122 As described in the manual, the quantity of class 1 designated chemical substances released to sewage from general waste treatment facilities (general waste incineration facilities and final treatment plants) need not be notified even though other regulations require that measurement be made.

As listed in No. 1 “e” of Article 4 of the Enforcement Regulations of the Law, the only quantity that general waste treatment facilities must assess is the “quantity released,” and the “quantity transferred” need not be assessed. Since the release to sewage is regarded as the “quantity transferred,” the quantity need not be assessed.

Note, however, that if you have a specific facility designated by the Law on Dioxins (general waste incinerator that satisfies certain requirements), you must also assess off-site transfer in waste. (No. 1 “g” of Article 4 of the Enforcement Regulations of the Law requires “release and transfer.”)

Q123 If we have an incineration facility in the waste treatment business category and another one in the night soil treatment business category, should we notify the sum of the quantities of “dioxins” released from both facilities as the quantity released from the business establishment?

A123 No. 1 “e” of Article 4 of the Enforcement Regulations of the Law defines that business establishments owned by a business that runs a waste treatment business must assess the quantity released, and does not limit the definition to “release related to waste treatment business.” Therefore, the incineration facility for “night soil treatment business” set up within the business establishment that runs the waste treatment business must sum up the quantity of substances subject to measurement according to the Clean Water Law and the quantity released from the incineration facility used for the waste treatment business, and submit notifications.

If a business establishment running a waste treatment business owns a specific facility defined by the Law on Dioxins, it must assess not only the quantity of dioxins released from the incineration facility used for waste treatment, but also the quantity released as a result of night soil treatment, add them up, and submit notifications.

Q124 A business (such as municipalities and public entities) owns general waste treatment facilities, among which a bulky waste treatment facility, recycling facility, waste transfer station etc., are operated as independent business establishments. Notification is also required in such cases, since the pertinent facilities are assumed to be specific requirement facilities. But no substances subject to measurement according to other regulations are released. How can we submit notifications in such cases? If the business is regarded as running a business subject to notification” and not as a business establishment having specific requirement facilities, the quantity of waste handled by the pertinent business establishment does not have to be assessed. How can we assess and submit notifications of specified substances in such cases?

A124 Even if a business establishment (owned by a business running a waste treatment business) owns general waste treatment facilities designated in Clause 1, Article 8 of the Waste Disposal and Public Cleansing Law, those not required to implement water quality inspections under the regulations listed in No. 1 “e” of Article 4 of the Enforcement Regulations of the Law (ministerial ordinances that designate technical standard concerning general or industrial waste final treatment plants, the Law on Dioxins, and the Clean Water Law) do not have to assess the quantity released according to No. 1 “e” of Article 4 of the Enforcement Regulations of the Law. Bulky waste treatment facilities, recycling facilities, and waste transfer stations that do not own final treatment plants, specific facilities defined by the Law on Dioxins, or facilities (incineration facility) subject to the Clean Water Law are not required to perform water quality inspections according to the above ordinances even if they are categorized as general waste treatment facilities. Therefore, they do not have to assess the release according to No. 1 “e” of Article 4 of the Enforcement Regulations of the Law. If those facilities fit into the description of No. 1 “a” or “b” of Article 4 of the Enforcement Regulations of the Law (if 1t or more of a class 1 designated chemical substance is handled, for example), they must submit notifications separately. (If not, the pertinent business establishment does not have to submit notifications.)