December 2005

Undisclosed Pollution

Local Impacts of the Bush Administration's Attack on the Toxics Release Inventory Program

U.S. PIRG Education Fund

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ACKNOWLEDGMENTS

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The author would like to acknowledge Tom Natan of National Environmental Trust and Rich Puchalsky of Grassroots Connection, who provided the analysis for this report. In addition, the author would like to thank Alison Cassady of U.S. PIRG Education Fund, and Sean Moulton of OMB Watch for their editorial support.

The U.S. PIRG Education Fund's Toxics and Environmental Health Program is grateful to the Bauman Foundation, the Beldon Fund, and individual contributors for their support.

The author alone is responsible for any factual errors. The recommendations are those of the U.S. PIRG Education Fund. The views expressed in this report are those of the authors and do not necessarily reflect the views of our funders or those who provided editorial review.

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EXECUTIVE SUMMARY

Since 1987, the Toxics Release Inventory (TRI) program has been the nation's premiere pollution disclosure program. By requiring companies to disclose the pollution they release to our air, water, and land, transfer off site, or dispose in a waste dump, the TRI program has ensured the public's right-to-know about toxic pollution in communities.

The TRI program is under attack. The Bush Administration has issued a series of proposed changes over the past few years, some of which would weaken the program by reducing the amount or quality of information available to the public. In the fall of 2005, however, the Bush Administration proposed the most significant changes yet. These changes to the TRI are three-fold:

- A rule to allow companies to release 10 times as much toxic pollution before they are required to report their releases;
- A rule to allow companies to withhold information about some of the most dangerous chemicals, such as lead and mercury;
- A notification to Congress that Environmental Protection Agency Administrator Stephen Johnson intends to release a rule changing the frequency of reporting to the program from every year to every other year.

Local communities would feel the greatest impact of these proposed changes. Grassroots Connection analyzed the local impact of these proposed rules and found the following:

- 3,849 facilities across the country would no longer be required to report their releases to the TRI.
- Many communities would be severely affected. For example, people living in 922 zip codes would lose one hundred percent of the pollution information reported in their area.

In order to protect the publics right-to-know about pollution in their neighborhoods, the Toxics Release Inventory should be strengthened, not weakened. The Bush Administration should drop this proposed rule, and instead look for ways to strengthen and expand this successful pollution disclosure program.

THE TOXICS RELEASE INVENTORY PROGRAM

Congress established the Toxics Release Inventory (TRI) program in 1986 as a part of the Emergency Planning and Community Right-to-Know Act (EPCRA). The TRI requires industries to disclose releases of toxic compounds into the air, water, and land, which the Environmental Protection Agency (EPA) then releases on an annual basis. According to the Conference Report from the passage of EPCRA, Congress intended to "provide the public with important information on hazardous chemicals in their communities." [1] EPA states that the goal of the program is to "empower citizens, through information, to hold companies and local governments accountable in terms of how toxic chemicals are managed."[2]

The TRI program allows citizens access to information about the toxic chemicals being released into their communities that could harm their health and local environment.

While the intent of the TRI program is to provide the public with adequate information, the program is only a first step in that direction. TRI does not cover all industries, all chemicals, or all releases of those chemicals, and within covered industries, only the largest facilities report. While more than 80,000 chemicals are currently on the market, the TRI program tracks only about 650 chemicals. This is less than one percent of chemicals on the market. In addition, any facility that employs fewer than 10 employees is exempt from reporting requirements.

The TRI requires facilities to report a variety of releases, transfers, and waste disposal for the approximately 650 toxic chemicals included in the program. The way a company determines if it is required to report to the TRI program is based on the amount of throughput, or chemicals entering and leaving the site during the year. The amount of throughput must trigger a threshold for the company to be required to report activity about that specific chemical. This activity is in the form of releases to the air, water, and land, off-site transfers for management and disposal, or waste managed on site.

Bhopal, West Virginia, and the Public's Right-to-Know

In the early morning of December 4, 1984, 40 tons of methyl isocyanate gas was released from a Union Carbide pesticide plant. The escaped gas formed a dense, ground-hugging cloud that spread throughout the city while the community slept. More than 500,000 residents were exposed, at least 2,000 died in the first three days, and more than 300,000 were injured.

In 1985, a smaller leak at a Union Carbide pesticide plant in Institute, West Virginia injured six workers and sent more than a hundred residents to the hospital. Although this accident was much smaller than the Bhopal disaster, the fact that accidents do happen was felt close to home. Public outcry for more information about toxic chemicals resulted in Congressional action to pass the Emergency Planning and Community Right-to-Know Act (EPCRA) in 1986. The law established a set of Local Planning Committees and the Toxics Release Inventory Program. President Ronald Reagan signed it into law in October of 1986.

PUBLIC SUPPORT FOR THE TRI PROGRAM

Since the inception of the TRI program, the public has expressed overwhelming support for the program itself, demonstrating the importance of the program with the public. When legislation was introduced in Congress in 1997 to expand the right-to-know program to include consumer products, chemicals in the workplace, and the impact of toxics on children, more than 700 groups spoke out about the importance of right-to-know and expressed their support of the TRI program.

Similarly, in response to changes to the TRI program proposed by the Bush Administration in 2004, EPA received at least 730 public comments. According to analysis by the Working Group on Community-Right-To-Know, 80% of these comments were in favor of retaining the public's right to information.[3]

In addition, Americans strongly believe in their right to know about toxic releases in their communities. In public opinion research conducted by the Pew Charitable Trusts, respondents articulated they felt strongly about their right to pollution information. One man from Carson City, Nevada reported: "I think that I would just like to be informed about things that could be potential problems, so that at least I would have the knowledge to make a decision to do something about it or not…I would just like to have information about what the government is doing, just so I can make my own decision." [4]

THE TRI PROGRAM AS A COMMUNITY TOOL

Communities across the country have been able to use the information provided through the TRI program to protect their health from toxic pollution. In 1994, the Working Group on Community Right-to-Know published a list of nearly 200 published reports using TRI data, most released by community groups.[5]

In Louisiana, community members have used TRI data to highlight potential health risks in two regions of the state: the Mississippi River corridor, known as "cancer alley," and the Lake Charles region. A collection of small community organizations in these two regions used the data to confront industries and companies responsible for the health-threatening pollution. In 2000, for example, some of these community groups released a report entitled *Breathing Poison: The Toxic Costs of Industries in Calcasieu Parish, Louisiana*.[6] Without access to this information, these community organizations would be unable to study potential causes of health problems in their communities.

In Massachusetts, the Massachusetts Public Interest Research Group (MASSPIRG) used the TRI program to launch a public accountability campaign in 1990 against Raytheon Corporation. TRI data showed that Raytheon was responsible for releasing the largest amounts of ozone-depleting chlorofluorocarbons (CFCs) and methyl chloroform in the state. Later, Raytheon promised MASSPIRG it would switch the chemicals it used to those options less harmful to the environment and to public health.

For a set of continually-updated success stories, please visit OMB Watch's website: http://www.ombwatch.org/tricenter/TRIsuccess.html.

THE TRI PROGRAM AIDS STATE GOVERNMENTS

In May 2003 EPA released a report titled "How Are the Toxics Release Inventory Data Used?" This report documented a variety of uses by the public, academics, industry, and state governments. In the report, EPA points to twenty different state governments that use the TRI program for environmental targeting, risk assessments, regulations, legislation, quality assurance and control, and other uses.[7]

For example, Florida's Waste Reduction Assistance Program (WRAP) uses TRI data to determine which facilities they should target for inclusion in their program, which helps facilities reduce their waste of TRI chemicals.

For a list of state government uses as reported by EPA, please see Appendix A.

SUCCESS OF THE TRI PROGRAM

The TRI program is often considered one of the most successful programs at the Environmental Protection Agency. The TRI program has been credited with initiating a voluntary decrease in toxic releases reported to the program, may have subsequently protected public health, and has been praised by public interest advocacy groups and industry leaders alike.

Toxics Use Reduction

Since 1988, disposals or releases of the original 299 chemicals have dropped by close to 60 percent.[8] Many factors could explain this reduction in toxic chemicals released to the environment. Between 1995 and 1998, for example, the number of companies reporting releases to TRI declined by nearly 6%.[9] An even greater impact, illustrated by numerous examples, is that companies and industries have bowed to public pressure and begun to actually reduce their releases.

Many corporations and facilities have responded positively to their inclusion in the TRI program. AK Steel Company's Butler Works plant, located Butler, Pennsylvania, is a perfect example of the power of public information. In 1999, the Pennsylvania Public Interest Research Group (PennPIRG) released a report that highlighted the high levels of nitrate compounds in the Connoquenessing Creek in Pennsylvania, using data made available by TRI.[10] In 2000, the Butler plant ranked as the worst water polluter in the country. As a result of this negative publicity and public pressure, AK Steel changed its processes to restrict the use of nitric acid and reduced its nitrate discharges by 73%. Within one year, the facility dropped from first to third on the list of the nation's largest water polluters.[11] Even more remarkable is that this change by a single actor caused releases in water in Pennsylvania to drop by more than 58% from 2000 to 2001.[12] In the case of AK Steel, the TRI provided the incentive to clean up, greatly reducing the amount of toxic chemicals released in Pennsylvania and protecting public health.

Protecting Public Health

According to an analysis of TRI data, releases to air and water by the original TRI industries of carcinogenic chemicals declined by 41 percent between 1995 and 2000. Developmental toxicant releases fell by 47 percent, reproductive toxicant releases by 49 percent, releases of suspected neurological toxicants by 31 percent and releases of suspected respiratory toxicants by 23 percent.[13]

The dramatic drop in releases reported to TRI should have a positive impact on the health of the American public. More science is emerging every day linking the growing rates of chronic disease in this country with environmental exposures to toxic chemicals. A groundbreaking 2000 study, for example, published in the *New England Journal of Medicine*, found that the environment played "the principal role in causing sporadic cancer." This same study attributed 25% of the causation of breast cancer to the environment.[14] In addition, the National Academy of Sciences found that toxic exposures cause at least 3% of all developmental disorders and learning disabilities facing our nation's children and may play a role in an additional 25%.[15]

Industry Support and Praise

Time and again, industry leaders who are required to report their emissions to TRI have publicly spoken out in support of the TRI program. The chemical industry in particular has praised the success and intention of the program. In 1990, Tom Ward, a representative of Monsanto Corporation, was quoted in Iowa recognizing that "the law is having an incredible effect on

industries to reduce emissions, and that's good. There's not a chief executive officer around who wants to be the biggest polluter in Iowa."[16]

Other executives have recognized the positive impact the TRI program has had for their businesses. Ciba Geigy's Corporate Environmental Report released in 1993 reported that: "The initial demand for environmental reporting came from the public. But in responding, we have discovered that the information is extremely useful to our own management. We have learned about our successes, our inadequacies and the gaps in our knowledge. It's a good example of the way in which external pressures ultimately prove to benefit both the environment and to industry."[17] Randy Hinton, of Vinings Industries in Marietta, Georgia, even admitted in 1991 "in the long run it [the TRI program] has saved us money."[18]

In addition, many companies use the TRI program as a public relations tool, documenting their progress in toxics use reduction. Many companies now include an environmental report on their websites, as they recognize the positive image a good environmental record brings them. Boeing Company includes TRI data on its website, reporting how overall releases have been declining. Boeing then makes a pledge to "invest and innovate in pollution prevention programs" and lead the progress of all industry in the reduction of pollution.[19] How far Boeing is willing to go to fulfill this pledge is not the point. Rather, many corporations recognize and highlight the success of the TRI program and their part in it.

PAINTING A BETTER PICTURE: THE LEAD RULE

Because lead poses a significant threat to human health and the environment in small amounts, in January 2001 EPA lowered the reporting threshold for lead; meaning, companies that meet the threshold of 100 pounds of lead now have to report to TRI, down from 25,000 pounds. In 2001, industry reported releasing 443 million pounds of lead, up from 374 million pounds in 2000. Lowering the lead threshold triggered more facilities to report their lead releases, providing communities with more information.

EPA should learn from past experiences such as the lead rule and lower reporting thresholds, not raise them.

THE BUSH ADMINISTRATION'S PROPOSALS

In the fall of 2005, the Bush Administration announced three proposed changes to the Toxics Release Inventory Program. The first two proposed changes were presented in the form of a proposed rule.[20] The third was as a notification to Congress that the Administration intends to pursue another rule within the next year that would allow companies to report every other year instead of annually.[21]

Raising the Threshold Means Losing Data

The first set of changes raises the threshold for required reporting from 500 pounds to 5,000 pounds for Toxics Release Inventory chemicals not considered persistent and bioaccumulative. Companies may be able to release ten times as much pollution before reporting details of what was released and produced if all of their production-related waste is released to the environment. Thousands of facilities will be let off the hook and will no longer have to report their toxic releases to the TRI program. Specifically, this threshold change would mean that facilities would be able to use the shorter, alternate "Form A" for releases, transfers, and disposed waste up to 5,000 pounds instead of the longer "Form R." The shorter "Form A" merely lists the chemical released and does not include any of the specific amounts of the chemical that was released to the environment.

Hiding Some of the Most Dangerous Chemicals

The second set of changes in the proposed rule concerns some of the most hazardous chemicals on the market: persistent, bioaccumulative toxins, or PBTs. PBTs, like lead and mercury, have lower reporting threshold because of how dangerous these chemicals can be in small quantities and their ability to persist in the environment and in our bodies for decades. Under the proposed rule, a facility using or releasing PBTs who have to report become eligible to use the shorter and less informative "Form A" if their waste is less than 500 pounds and if they have zero releases to the environment. The new proposal would allow companies to withhold reporting on low-levels of these chemicals, even though these chemicals are dangerous in small amounts.

Cutting the Program in Half: No Annual Reporting

In October, 2005, EPA sent a notification to Congress informing them that the agency intends to propose a rule within the year that would allow facilities to report every other year rather than annually. The effect of this proposal would be dramatic. First, this change would make it more difficult to track and identify trends in pollution and determine whether releases are increasing or decreasing. Second, this change could provide an incentive for companies to increase and hide their releases during the off-reporting years.

Cost of the Proposals

EPA has estimated that it will save only $2 million every other year if it implements these changes,[22] a tiny fraction of the federal budget and the operating budgets of the companies reporting to the program. Moreover, these cost savings not only fail to take into account the value of the lost information but ignore the soaring health care costs for many of chronic diseases linked to chemicals reported in the TRI program. The Centers for Disease Control and Prevention reports that health care for chronic diseases costs the nation $750 billion annually.[23]

LOCAL IMPACTS OF PROPOSED RULES

The greatest impact of these proposed rules would be felt at the local level. Across the country:[24]

- 3,849 facilities would no longer have to report detailed pollution information; and
- 2,364 communities would lose the details of half of the chemicals released in their area.

Facilities That Would No Longer Report

Many facilities would no longer be required to report their releases, transfers, and waste to the TRI program if this rule becomes final. Nationally, 3,849 facilities would no longer have to report detailed pollution information to the TRI program (Table 1). For more information about facilities that would no longer be required to report, please see Appendix B.

Table 1. Number of Facilities That Would No Longer Report TRI Information By State

State	Lost Facilities	State	Lost Facilities	State	Lost Facilities	State	Lost Facilities
CA	297	SC	107	KS	41	NV	21
OH	261	NJ	90	AR	40	ID	13
TX	217	MO	88	MS	40	NM	12
PA	216	AL	80	UT	39	SD	11
IL	207	KY	78	MD	36	DE	10
MI	156	MN	61	CO	35	HI	7
IN	145	VA	61	WV	34	AK	6
NC	140	WA	61	PR	32	VT	6
FL	135	CT	60	NH	30	MT	5
NY	135	OR	58	ME	25	WY	5
GA	134	LA	56	RI	24	DC	2
MA	125	IA	54	NE	22	ND	2
WI	119	AZ	51	NV	21	VI	1
TN	110	OK	48	ID	13	*TOTAL*	**3849**

Chemicals Would No Longer be Reported

In addition, the Bush Administration's proposed changes to the TRI program will cause a loss of important information about specific chemicals. By raising the threshold for reporting requirements, polluters could release up to ten times as much pollution before they would be required to provide detailed reporting. In addition, even if their pollution remains at the same level, the public will no longer know about specific chemicals being released from these facilities. For more information about chemicals that would no longer be reported in each state, please see Appendix C.

Zip Codes that Would Lose Reporting Information

The greatest impact of these rule changes would be felt at the community level. People living in certain zip codes would no longer have access to any information at all about the toxic chemicals released into their neighborhoods. Nationally, 2,364 communities would no longer have access to information for about half of the chemicals released in their area. Overall, 922 zip codes would lose all their pollution information if this rule goes through. For more information about zip codes that would be affected in each state, please see Appendix D.

CONCLUSION

The Toxics Release Inventory is a valuable program that provides the public with the basic information they need about pollution in their communities. The TRI has been credited with providing an incentive for facilities and companies to reduce their pollution, has subsequently protected human health, and has been applauded by local communities and industrial leaders alike. Any attempt to weaken the program is moving in the wrong direction. Instead, EPA and other officials should look for ways to strengthen the program. Specifically, EPA should:

- Drop attacks on the TRI program, particularly those changes that would result in any loss of information.
- Fill the data gaps currently in the TRI program through expansion of TRI or the creation of state-level programs. These gaps include facilities that employ fewer than 10 employees, the exclusion of a set of non-manufacturing industries (such as dry cleaners), chemicals released in materials and consumer products, the tens of thousands of chemicals not currently on the list of TRI chemicals, and other sources of releases.
- Improve the speed and accuracy of reporting by requiring facilities to immediately make their reported releases available to the public. EPA currently works with facilities for months before any information is available to the public. Immediate public reporting would hold reporters accountable to accuracy the first time they report, and would reduce the amount of time and money EPA staff spend to help companies through the process.

METHODOLOGY

Rich Puchalsky of Grassroots Connection performed the analysis for this report. Tom Natan of National Environmental Trust provided additional analysis and assistance in translating the raw data into these findings. The analysis used 2003 TRI data, and applied the new thresholds to determine which facilities would no longer be required to file a detailed Form R, and which Form Rs would no longer be filed to report specific chemicals and in specific zip codes.

Additional analysis, including more data on the impacts of these rules, is available at www.net.org.

APPENDIX A.

Source: EPA, "How Are the Toxics Release Inventory Data Used?," May 2003.

User	Description	Reference
Air Pollution Control Program of Missouri, Department of Natural Resources (DNR)	Missouri DNR used TRI data to check quality of their Missouri Emissions Inventory Questionnaire (EIQ) data. Missouri DNR was able to show that 2 facilities incorrectly reported emissions data on the EIQ.	E-mail from Giroir, Louis Eric, Toxicologist, Air Pollution Control Program, Missouri Department of Natural Resources to Katherine Jennrich, intern, Toxics Release Inventory Program Division, OPPT, June 13, 2000.
Colorado Department of Public Health and the Environment, P2 Program	The Department used TRI and other data to identify the 10 industry groups responsible for the largest quantities of hazardous waste generation or toxic chemical releases in the state. will serve as the basis for establishing priorities for P2 activities and for distribution of technical assistance grants. It will also used to target large companies for participation in a Governor's P2 Challenge Program to reduce toxic emissions and hazardous waste generation.	Economic Analysis of the Final Rule to Add Certain Industry Groups to EPCRA Section 313, p. 6-29, April 1997
Indiana Governor's Office	The Indiana Governor's Toxics Reduction Challenge of 1998 gives publicity to companies meeting certain standards (i.e., reductions in toxic chemical releases).	<www.in.gov/idem/>
Louisiana's Environmental Leadership P2 Program	Louisiana used TRI data to track the progress of a statewide emissions prevention and reduction program that seeks a 45% reduction in toxic chemical releases by 1997, using 1992 data as a baseline. The Program sponsors the Governor Awards for Environmental Excellence to promote public recognition of industry achievements (U.S. EPA, 1993b).	Economic Analysis of the Final Rule to Add Certain Industry Groups to EPCRA Section 313, p. 6-29, April 1997
North Carolina P2 Program	North Carolina uses TRI data to integrate multi-media toxic chemical release data into statewide waste reduction activities, such as technical assistance, grants, research, and demonstration projects.	Economic Analysis of the Final Rule to Add Certain Industry Groups to EPCRA Section 313, p. 6-29, April 1997
States of Kentucky, Ohio, and West Virginia	The states jointly participated in a "Tri-State Initiative" to identify, prevent, and remediate environmental threats. Program coordinators use TRI data in their risk assessment process to focus on sources of greatest concern. program will use voluntary industry commitments and cooperative efforts among industry, the public, and government to achieve reductions in TRI chemical and criteria air pollutant releases.	Economic Analysis of the Final Rule to Add Certain Industry Groups to EPCRA Section 313, p. 6-29, April 1997
States of Arkansas, Ohio, Oregon, and Washington	The states participated in the EPA Office of Solid Waste's Measurement Project, using TRI data in projects assessing P2 measurement at the facility level.	"Taking Stock" Commission for Environmental Cooperation (CEC)
Florida Waste Reduction Assistance Program (WRAP)	WRAP uses TRI data to target facilities for the program, which answers facility	Economic Analysis of the Final Rule to Add Certain Industry Groups to EPCRA

	requests to provide assistance in source reduction and waste minimization in the handling of TRI chemicals.	Section 313, p. 6-29, April 1997.
Georgia Department of Natural Resources, P2 Division	Georgia used TRI data in the process of identifying the technical assistance needs of manufacturing sectors that generate chemicals posing the greatest relative risk to public health and the environment. The Division first prioritized chemicals, and then examined manufacturing sectors releasing the highest priority chemicals and identified particular subsectors for further assessment.	Economic Analysis of the Final Rule to Add Certain Industry Groups to EPCRA Section 313, p. 6-29, April 1997
Missouri Department of Natural Resources, Air Pollution Control Program (APCP)	APCP uses TRI data to identify air pollution sources that might have to comply with Maximum Achievable Control Technology (MACT) Standards. The Program also used TRI data to identify environmental "hot spots" in Missouri for community-based environmental project targeting.	E-mail from Giroir, Louis Eric, Toxicologist, Air Pollution Control Program, Missouri Department of Natural Resources to Katherine Jennrich, intern, Toxics Release Inventory Program Division, OPPT, June 13, 2000.
New Jersey Department of Environmental Protection and Energy	New Jersey used TRI data in a computerized GIS to prioritize facilities and geographic areas for implementing P2 measures. Department used minor watersheds to aggregate and map toxic chemical releases to water. The Department then grouped chemicals based on health and environmental effects to study the cumulative impact of many releases in the area.	Economic Analysis of the Final Rule to Add Certain Industry Groups to EPCRA Section 313, p. 6-29, April 1997
New York State Department of Environmental Conservation	New York State used TRI data to identify 400 facilities generating 95% of the state's toxic pollution for priority attention in multi-media inspection, enforcement, ongoing monitoring, and P2 planning.	"States as Innovators: It's Time for a New Look to Our 'Laboratories of Democracy' in the Effort to Improve Our Approach to Environmental Regulation." Alabama Law Review 347, p. 370-71 (1994)
States of California, Delaware, Louisiana, New Jersey, and North Carolina	These and other states have used TRI to support the passage of stricter environmental legislation.	Fung and O'Rourke. "Reinventing Environmental Regulations from the Grassroots Up." Environmental Management, Vol. 25, No. 2
Illinois EPA, Bureau of Air	The Bureau uses TRI data to determine quantities of stack and fugitive air emissions of reported substances. This information supports continuing development of regulatory proposals in response to legislation passed in 1987 to address air toxics.	Dewulf, Cindy. "Utilization of Form R Data," TRI Contact for Ohio EPA
Louisiana State Legislature	TRI data supported the Legislature's actions to require the state DEQ to issue regulations identifying 100 priority pollutants, set emissions standards for those pollutants, and target a 50% emissions reduction from 1987 levels by 1994.	Economic Analysis of the Final Rule to Add Certain Industry Groups to EPCRA Section 313, p. 6-29, April 1997.
Minnesota Legislature	The Minnesota Legislature amended the state's EPCRA in 1993 to expand TRI reporting requirements to non-manufacturing industries.	Economic Analysis of the Final Rule to Add Certain Industry Groups to EPCRA Section 313, p. 6-29, April 1997
North Carolina Environmental Management Commission	The Commission set limits for 105 pollutants after a public interest group published a report on unregulated air toxics emissions in the state.	Economic Analysis of the Final Rule to Add Certain Industry Groups to EPCRA Section 313, p. 6-29, April 1997

Kentucky Division of Environmental Services	Kentucky occasionally uses the TRI database when it makes determinations regarding risk assessments.	E-mail from Alex Barber to Katherine Jennrich, intern, Toxics Release Inventory Program Division, dated June 1, 2000
New York State Department of Health	New York State developed a risk screening protocol using TRI air release data and toxicity potency data to produce relative risk scores and rankings for facilities and chemicals within the state. Results suggested the need for more careful evaluation of health effects resulting from large releases of noncarcinogenic compounds.	Hazen, Susan B. "An Overview of Uses of the Toxics Release Inventory Data in the U.S." Environmental Assistance Division, OPPT, US EPA, 1995.
Oregon Department of Environmental Quality (DEQ)	Oregon relied on the TRI database to apply a computer model that evaluates cross-media impacts and ranks the relative risks to human health and the environment associated with pollutant discharges.	Economic Analysis of the Final Rule to Add Certain Industry Groups to EPCRA Section 313, p. 6-29, April 1997
Missouri Department of Natural Resources (DNR), Air Pollution Control Program	Missouri compared fugitive and stack emissions reported to TRI with emissions data reported on the Missouri Emissions Inventory Questionnaire (EIQ), identifies facilities reporting incorrectly, and corroborates data.	E-mail from Giroir, Louis Eric, Toxicologist, Air Pollution Control Program, Missouri Department of Natural Resources to Katherine Jennrich, intern, Toxics Release Inventory Program Division, OPPT, June 13, 2000
Illinois Department of Public Health	Illinois Department of Public Health requested and received TRI data to use as inputs into its Health and Hazardous Substances Registry.	Dewulf, Cindy. "Utilization of Form R Data," TRI Contact for Ohio U.S. EPA
Illinois EPA, Bureau of Land	Illinois EPA uses TRI data to identify toxic chemicals present at hazardous waste sites for a number of programmatic reasons.	Dewulf, Cindy. "Utilization of Form R Data," TRI Contact for Ohio U.S. EPA
West Virginia Division of Environmental Protection, Public Empowerment Program	West Virginia created a web site that includes TRI and other environmental, physical, and demographic data in an easy-to-use and format to increase the public's understanding of their communities through better access to information.	<www.dep.state.wv.us>

END NOTES

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[23] Center for Disease Control and Prevention, "Chronic Disease Overview," August 30, 2002, http://www.cdc.gov/nccdphp/overview.htm.
[24] National Environmental Trust and Grassroots Connection provided the analysis for this report. Please refer to the methodology for further details.