



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON D.C. 20460

OFFICE OF THE ADMINISTRATOR  
SCIENCE ADVISORY BOARD

July 12, 2006

EPA-SAB-COM-06-001

The Honorable Stephen L. Johnson  
Administrator  
United States Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Subject: Toxics Release Inventory Data

Dear Administrator Johnson:

This commentary was developed by the Science Advisory Board (SAB) Environmental Economics Advisory Committee (EEAC) to address the importance of maintaining comparability and validity in the Toxics Release Inventory (TRI) data. Although the committee has not conducted a formal study of the proposed changes to the TRI, we are sufficiently concerned about the potential negative impact of these changes on scientific research that we offer this commentary. The SAB economists view the maintenance of the integrity of TRI data as a high priority for EPA and the research community at large.

Recently, EPA has proposed rule changes that would curtail TRI data collection in two significant ways. The first, which we understand is in the final stage of rulemaking, increases the number of facilities eligible to submit a shorter certification statement (Form A), rather than a full statement on releases. The second, which we understand has not yet been formally proposed, involves a change in reporting requirements so that facilities will report releases biennially rather than annually. This may compromise the comparability and quality of the data in the TRI series. The SAB is concerned that these proposed changes may hinder the advances of environmental research used to protect public health and the environment.

TRI data are widely used to evaluate changes in facility and firm environmental performance, to conduct risk assessments of changes in toxic release levels, and to conduct spatial analyses of toxic hazards. The TRI data provide the only reliable source of longitudinal data for this type of research. Over 120 scholarly articles have been published using the Toxics Release Inventory data to address a wide range of public health, economic and social science issues. The list of these publications may be found in the TRI Docket (at [www.regulations.gov](http://www.regulations.gov)) as comment number EPA-HQ-TRI-2005-2273-2099.2.

This type of research can indeed inform EPA in developing environmental programs and conducting analyses, including benefit-cost analysis, environmental justice analysis, and children's health analysis, mandated under various executive orders, for program evaluations required by the Government Performance and Results Act, and for the Program Assessment Rating Tool program required by the Office of Management and Budget.

In our view, the proposed changes will specifically affect the value of TRI data in the following two ways.

1. Increased eligibility for Form A reporting will obscure the extent of facilities' releases of toxic chemicals. The changes in reported toxic chemical release levels will make the data incomparable over time and across facilities. Further, they will impair researchers' ability to use TRI data to assess spatial health impacts of toxic chemical releases, and may also reduce variation in the data that are useful in identifying epidemiological and other relationships. These research effects could significantly limit the national picture of the effect of toxic chemicals in the environment.
2. Biennial reporting will make it impossible to track actual emissions in communities (or by facilities) from year to year. This will also make it very difficult to conduct reliable scientific studies, since the releases in the "off-year" will be unobserved unless the biennial reports contain release information for all years. This would seriously undermine the value of the TRI for scientific research, and also make it less useful for other intended purposes.

We hope this commentary offers some insight into the importance of the Toxics Release Inventory data for scholarly research that supports EPA's mission and provides critical information to the scientific and policy communities as well as the public. For this purpose, it is important to consider the impact of these TRI reporting changes on the validity and comparability of the TRI data and to explore ways in which such data collection could be improved in the future. The Committee will be pleased to answer any questions you or your staff may have.

Sincerely,

/Signed/

Dr. M. Granger Morgan, Chair  
EPA Science Advisory Board

/Signed/

Dr. Maureen Cropper, Chair  
SAB Environmental Economics Advisory  
Committee

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