

APPENDIX F
INFORMATION SOURCES CONTAINING DATA SUBSETS, BUT NOT
COMPREHENSIVELY COMPARABLE ALTERNATIVES TO TRI DATA

**Appendix F: Information Sources Containing Data Subsets,
But Not Comprehensively Comparable Alternatives to TRI Data**

In this appendix, data elements available from several information sources are compared to those reported to TRI. The analysis is broken down by the specific types of data collected under TRI. While some sources may appear to be substitutes for TRI, they do not adequately address the entire scope of TRI, even in combination. For example, a given source may:

- Not include all toxic chemicals covered by TRI,
- Be compiled less frequently than TRI, and/or
- Not be as easily accessible (if at all) to the general public.

**Table F-1: Relevant Information Sources
(TRI Included for Comparison)**

Description	Chemical Coverage	Industry/Facility Coverage	Reporting Frequency	Public Access
TRI DATA				
EPCRA §313 requires facilities to submit reports on releases (including disposal) of particular toxic chemicals exceeding a given threshold. The reports provide information on the quantity of chemical released into the environment and to which medium (air, land, water) the disposal took place, as well as information about waste management and the amount of chemicals stored on-site.	The current TRI toxic chemical list contains 595 individually-listed chemicals and 31 chemical categories (including four categories containing 68 specifically-listed chemicals).	NAICS codes corresponding to SIC codes 20-39, 10; 12; 4911, 4931, 4939; 4953; 5169; 5171; and 7389. A facility need only report if it has 10 or more Full Time Equivalents (FTEs).	Annual.	EPA compiles the TRI data and makes them available through several data access tools, including TRI Explorer and Envirofacts. Other organizations also make the data available to the public through their own data access tools.

Description	Chemical Coverage	Industry/Facility Coverage	Reporting Frequency	Public Access
AIR EMISSIONS (SECTIONS 5.1 AND 5.2)				
National Emissions Inventory (NEI)				
NEI provides estimates of anthropogenic pollutant emissions from stationary sources, as well as area sources and mobile sources. These estimates, submitted to EPA by delegated authorities (state or county), electric utilities, and/or generated by EPA from various sources, differ in estimation methodology used.	8 CAPs and 187 HAPs.	No NAICS limitations.	Triennial.	CSV files can be downloaded from EPA's Web site.
Air Facility System (AFS)				
AFS contains compliance and permit data for stationary sources of air pollution regulated by U.S. EPA, and state and local air pollution agencies.	N/A	No NAICS limitations.	Annual.	Can be accessed on a facility-by-facility basis through EPA data access tools, including Envirofacts or the Enforcement and Compliance History Online (ECHO).
State Air Emissions Inventories				
Several states and regional agencies maintain their own air emissions inventories. However, the amount of data as well as the types of data elements collected vary widely from state to state.	Varies widely (e.g., the California Air Resources Board maintains its own list of about 400 toxic air pollutants).	Varies.	Varies.	Most of these data are submitted to NEI. Some data are available on the Web on a state-by-state basis.
Title V Part 70 Operating Permits				
Under the 1990 Clean Air Act Amendments, facilities designated as "major sources" and facilities otherwise subject to §112 and Title V must apply for a Title V Part 70 Operating Permit. As part of the application for a Title V permit, some facilities may have to report emissions of air toxics.	187 HAPs.	No NAICS limitations.	At the time of permit application, renewal, and modification—permits are typically renewed every 5 years.	No central repository for the information.

Description	Chemical Coverage	Industry/Facility Coverage	Reporting Frequency	Public Access
DIRECT DISCHARGES TO WATER (SECTION 5.3)				
Integrated Compliance Information System–National Pollutant Discharge Elimination System (ICIS-NPDES)				
<p>ICIS-NPDES is a national information management system that tracks implementation of the National Pollutant Discharge Elimination System (NPDES) program, authorized by the Clean Water Act. ICIS-NPDES tracks permit issuance, permit limits, self-monitoring data, compliance data and other data pertaining to facilities regulated under NPDES.</p>	<p>Contains monthly discharge monitoring data for selected water parameters/pollutants and flow rates for all CWA major and many minor sources.</p>	<p>No NAICS limitations.</p>	<p>Major permittees must submit Discharge Monitoring Reports (DMRs) monthly or quarterly; non-major permittees must submit at least annually.</p>	<p>Can be accessed on a facility-by-facility basis through EPA data access tools, including Envirofacts, and ECHO.</p>

Description	Chemical Coverage	Industry/Facility Coverage	Reporting Frequency	Public Access
UNDERGROUND INJECTION AND LAND DISPOSAL ON-SITE (SECTIONS 5.4 AND 5.5)				
RCRA Biennial Reports				
<p>Section 3002(a)(6) of the Resource Conservation and Recovery Act (RCRA) requires EPA to develop a program for hazardous waste generators to report the nature, quantities, and disposition of hazardous waste generated at least once every two years. In addition, section 3004(a)(2) of RCRA requires treatment, storage and disposal facilities (TSDFs) to submit a report on the wastes that they receive from off-site. The biennial Hazardous Waste Report (also known as the “Biennial Report”) was implemented in 1985 to comply with these requirements. The Biennial Report form (8700-13A/B) must be submitted to the authorized state agency or the EPA Regional Office by March 1st of every even-numbered year. The form includes information such as the facility's RCRA ID number, the name and address of the facility, the quantity of hazardous waste sent to each TSDF in the United States and the manner in which the waste was treated during the previous year.</p>	<p>Contains annual volumes of RCRA wastes and how they are managed (offsite in the case of Large Quantity Generator and on-site in the case of treatment storage and disposal Facilities, TSDFs). Each waste stream is characterized by all applicable waste codes but volumes of each are not broken out.</p>	<p>No NAICS limitations; however, certain waste categories are excluded (e.g., mining and agriculture).</p>	<p>Biennial.</p>	<p>Can be accessed on a facility-by-facility basis through EPA data access tools, including Envirofacts. Text files can be downloaded from EPA’s Web site.</p>
DISCHARGES TO A POTW (SECTION 6.1)				
RCRA Biennial Reports (BR)				
<p>Biennial Reports require some reporting of discharges to POTWs. See above for more details.</p>	<p>See above.</p>	<p>See above.</p>	<p>See above.</p>	<p>See above.</p>
ICIS-NPDES				

Description	Chemical Coverage	Industry/Facility Coverage	Reporting Frequency	Public Access
ICIS-NPDES allows for reporting of indirect discharges to water. See above for more details.	See above.	See above.	See above.	See above.
TRANSFERS TO OTHER OFF-SITE LOCATIONS (SECTION 6.2)				
RCRA Biennial Reports (BR)				
Biennial Reports contain hazardous waste data from large quantity generators and TSDFs. Biennial Reports also require reporting of off-site transfers on Form GM. Information includes the RCRA ID of the facility to which the waste was shipped, the processes used to treat, recycle, or dispose of the waste at the off-site facility, the off-site availability code, and the total quantity of waste shipped during the report year. The reports also provide data on the volume of hazardous waste shipped off-site for land disposal, a release end-point of relevance to TRI. See above for more details.	See above.	See above.	See above.	See above.
CHEMICAL STORAGE AND INVENTORY DATA (SECTION 4.1)				
EPCRA §312 Tier I and II Reports				
EPCRA §312 requires that states establish plans for local chemical emergency preparedness and that inventory information on hazardous chemicals be reported by facilities to state and local authorities.	Hazardous or extremely hazardous substances (essentially any substance that poses a health or physical hazard).	No NAICS exemptions for facilities that are covered under the reporting threshold requirements, but facilities not included under OSHA's Hazard Communication Standard (e.g., mines) do not have to file.	Annual.	On a facility-by-facility basis, by forwarding a written request.
Risk Management Plan (RMP)				

Description	Chemical Coverage	Industry/Facility Coverage	Reporting Frequency	Public Access
Under the authority of section 112(r) of the Clean Air Act , the Chemical Accident Prevention Provisions require facilities that produce, handle, process, distribute, or store certain chemicals to prepare a Risk Management Plan (RMP) and submit the RMP to EPA. These plans include information about chemical amounts stored and processed at RMP facilities.	Certain flammable and toxic substances.	No NAICS limitations.	At least every five years, or within six months of an incident.	Restricted access: RMP information may be accessed via the Federal Reading Rooms.
Chemical Data Reporting (CDR)				
Under TSCA Section 8(a), chemical manufacturers (including importers) are required to report manufacturing-related information to EPA for sites that manufactured (including imported) 25,000 pounds or more of a reportable chemical substance any one calendar year between submission periods. Industrial processing and use information and commercial and consumer use information must also be reported for these sites.	Varies.	Limited to manufacturers, including importers, of subject chemicals. Certain manufacturers are exempt, including small manufacturers (sales <\$40 million), those manufacturing a chemical for research and development, those manufacturing chemicals as impurities, and those submitting information under another TSCA Section 8a rule.	Every four years.	Data claimed as Confidential Business Information (CBI) are not available to the public. Non-CBI data downloads are available from EPA's CDR website.
POLLUTION PREVENTION DATA (SECTIONS 8.1-8.7; 8.10)				
RCRA Biennial Reports (BR)				
Biennial Reports contain pollution prevention information on hazardous waste from large quantity generators and TSDFs. Data are collected primarily by states, and are collated by EPA. See above for more details.	See above.	See above.	See above.	See above.
State Environmental Agency Databases				

Description	Chemical Coverage	Industry/Facility Coverage	Reporting Frequency	Public Access
At least fourteen states ¹ implement mandatory pollution prevention programs. Pollution prevention data collected under these programs varies by state, and may include both data similar to that collected by TRI (e.g., quantities of waste managed, source reduction activities, etc.) and details not found in TRI (e.g., pollution prevention plans, costs associated with waste management, etc.).	Varies.	Varies. May include TRI filers, facilities that use toxic chemicals, and generators of hazardous waste.	Varies.	There is no central source for state collected pollution prevention data. Accessibility varies by state.
EMERGENCY RELEASE DATA (SECTION 8.8)				
National Response Center (NRC)				
NRC collects real-time information about virtually all oil and chemical spills throughout the United States to identify spills for which to coordinate emergency response.	Oils and chemicals.	No source exemptions.	Real-time.	Historical information about spills can be retrieved through the NRC online query system: www.nrc.uscg.mil/foia.html .
Risk Management Plan (RMP)				
RMP contains a five-year accident history for each facility with details on releases of regulated substances from covered processes with 1) on-site deaths, injuries, or significant property damage; or 2) known off-site deaths, injuries, property damage, environmental damage, evacuations, or sheltering in place. See above for more details.	See above.	See above.	See above.	See above.

¹ Arizona, California, Georgia, Maine, Massachusetts, Minnesota, Mississippi, New Jersey, New York, Oregon, Tennessee, Texas, Vermont, and Washington.

Description	Chemical Coverage	Industry/Facility Coverage	Reporting Frequency	Public Access
STATE RIGHT-TO-KNOW PROGRAMS				
Several states require expanded state TRI reporting to include industries or facilities not covered by TRI or to report information beyond that required by the federal TRI Program (e.g., Arizona, Massachusetts, and Wisconsin).	Varies. Often identical to TRI.	Varies. May include more industries than TRI.	Annual.	There is no central source for state collected data. Accessibility varies by state.

