

1999 Toxics Release Inventory Data Release

Questions and Answers

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TRI Background

Q Who was required to report to TRI in 1999?

A A facility was required to report to TRI in the 1999 reporting year if it met the following three criteria:

- Conducts manufacturing operations within SIC codes 20 through 39 and, beginning in the 1998 reporting year if it is in one of the following industries, metal mining, coal mining, electrical utilities, RCRA Subtitle C hazardous waste treatment and disposal facilities, chemicals distributors, petroleum terminals, and solvent recovery services. Federal facilities report regardless of SIC code.
- Employs 10 or more full-time employee equivalents.
- Manufactures or processes more than 25,000 pounds or otherwise uses more than 10,000 pounds of any listed chemical.

Q What is EPA's role in releasing TRI data versus the role of the states?

A Facilities are required to report their data both to EPA and to the states. EPA makes available its data to the public through the Internet as well as other electronic and hard copy products. A number of states also make available their data through electronic as well as hard copy products. EPA's information products tend to take a more national focus while state products may focus on more local and regional issues.

Q What are the limitations of how the data can be used or interpreted?

A While TRI provides the public, industry, and state and local governments an invaluable source of key environmental data, it has some limitations that must be considered when using the data. First, users of TRI information should be aware that TRI data reflect releases and other waste management of chemicals, not exposures of the public to those chemicals. Release estimates alone are not sufficient to determine exposure or to calculate potential adverse effects on human health and the environment. TRI data, in conjunction with other information, can be used as a starting point in evaluating exposures that may result from releases and other waste management activities of toxic chemicals.

Also, TRI collects data from a specific set of industry sectors, including the manufacturing sector (SIC codes 20-39), metal mining, coal mining, electric utilities, petroleum bulk terminals, chemicals wholesalers, RCRA commercial hazardous waste treatment, and solvent recovery. Federal facilities also report to TRI regardless of their SIC classification. Although TRI is successful in capturing information on a significant portion of toxic chemicals currently being used by covered industry sectors, it does not cover all

toxic chemicals or all industry sectors. In addition, facilities that do not meet the TRI reporting threshold levels (including an employee threshold and manufacturing processing/use threshold) are not required to report.

Another limitation of the existing TRI program is that the data currently collected provide limited information on the life cycle of chemicals used by facilities. Beyond reporting on releases and other waste management, only limited and very general information on storage of chemicals is provided. In addition, this report does not account for toxic emissions from cars and trucks, nor from the majority of sources of releases of pesticides, volatile organic compounds, fertilizers or from many other non-industrial sources.

Furthermore, facilities report estimated data to TRI, and the program does not mandate that they monitor their releases. Various estimation techniques are used when monitoring data are not available, and EPA has published estimation guidance for the regulated community. Variations between facilities can result from the use of different estimation methodologies. These factors should be taken into account when considering data accuracy and comparability.

Summary of 1999 TRI Release Data

1999 Chemical Release Data—All Industries

Q What are the total on- and off-site releases for 1999? How much do the new industries reporting to TRI for the second year contribute to the 1999 total?

A In 1999, facilities reported 7.8 billion pounds of total releases to air, land, water and underground injection on- and off-site. The original (manufacturing) industries reported approximately 2.3 billion pounds, or 29.9%, of the 7.8 billion pounds and submitted 69,471 total forms. Facilities in the new sectors reported approximately 5.4 billion pounds, or 71.1%, of the 7.8 billion pounds. The new industries submitted 14,597 total forms.

Q Are most of the 1999 releases for the original (manufacturing) and new industries on-site releases? If so, to which media were the largest releases?

A In 1999, 93.8% (7.3 billion pounds) of the total releases were on-site. Of these on-site releases, 65.1% were to land, 27.8% were to air, 3.5% were to underground injection, and 3.6% were to surface water. Reporting from the new industries accounted for 93.2% of the total land releases on-site, 42.1% of the air releases, 22.6% of the releases to underground injection wells, and 2.0% of the discharges to surface water.

Off-site releases were 6.2% (479 million pounds) of the total releases in 1999. Of these off-site releases, 58.2% (279 million pounds) were to landfills/surface impoundments.

Q 1999 was the second year that EPA collected information from the commercial hazardous waste treatment sector. Is there double counting of some releases in TRI now that EPA collects information from this sector?

A In the analysis of the 1998 and 1999 data, EPA has taken steps to adjust for possible double counting of some releases in TRI now that EPA collects information from this sector. The potential for double counting arises because some manufacturing facilities report transfers of chemicals to other facilities that may then report the release of these chemicals. TRI facilities transfer off-site chemicals in waste to other facilities for disposal. These other facilities can dispose of the wastes in on-site landfills, disposal surface impoundments, in land treatment facilities, other types of land disposal, and underground injection wells or, if metals are sent to a wastewater treatment facility, they may be discharged to surface waters. These other facilities generally are treatment, storage and disposal (TSD) facilities regulated under the federal Resource Conservation and Recovery Act (RCRA). As mentioned above, such facilities are in one of the new industries required to report to TRI for the first time in the 1998 and in 1999.

To avoid counting the transfers to the TSD facilities that are also reported to TRI as on-site releases by the TSD facilities, off-site transfers for disposal to these TSD facilities have been omitted from tables that compare or summarize on-site and off-site releases nationally or at a state level. Only the on-site releases from the TSD facilities have been included. Conducting this exercise required that EPA match amounts transferred to TSD facilities with amounts reported by these TSD facilities by using the reported RCRA ID number. In some cases, these RCRA ID numbers were not reported correctly by the facility so there are some quantities that cannot be matched and, therefore, these quantities could not be omitted from the analysis.

1999 Chemical Release Data--New Industries

Q What sectors had the largest total releases among the new industries? Also, which categories of releases contributed most to these numbers and which chemicals contribute most to these releases?

A Of the seven new sectors, two sectors (metal mining and electric utilities) accounted for 94.4% of the 5.4 billion pounds of total releases from these newly reporting industry sectors.

The metal mining sector reported 4.0 billion pounds, or 73.0%, of the 5.4 billion pounds of total releases reported by the new industries. 99.9% of the metal mining sector's total releases were on-site and 99.0% of these on-site releases were to land. The chemicals that contributed the most to the metal mining sector's total releases were copper compounds (1.7 billion pounds), zinc compounds (678 million pounds), and arsenic compounds (550 million pounds). The majority of the releases of these three chemicals were to land on-

site. Together, these three chemicals make up 73.9% of the total releases for the metal mining sectors. Many of the releases reported in TRI by metal mines are from their release of toxic chemicals in waste rock and processed rock to the land.

The electric utility sector (SIC code 49) reported 1.2 billion pounds of releases, or 21.4%, of the 5.4 billion pounds of the releases from the new industries. On-site releases were 95.0% of the electric utility sector's total releases and 76.2% of these on-site releases were to the air. The chemicals that contributed the most to the electric utility sector's total releases were hydrochloric acid (615 million pounds), barium compounds (181 million pounds), and sulfuric acid (153 million pounds). The majority of the releases of hydrochloric acid and sulfuric acid were to air and the majority of the releases of barium compounds were to land on-site. Together, these three chemicals make up 81.6% of the total releases for the electric utility sector. (Note that some chemicals which the electric utilities release in significant quantities, SO_x, NO_x, and CO are not on TRI.)

The sector made up of RCRA Subtitle C hazardous waste treatment and disposal facilities (SIC code 4953) and solvent recovery facilities (SIC code 7389) reported 288 million pounds, or 5.3% of the 5.4 billion pounds of releases from the new industries. On-site releases were 84.8% of this sector's total releases and 84.7% of these on-site releases were to RCRA subtitle C landfills. The chemicals that contributed the most to these sector's total releases were zinc (fume or dust) (54 million pounds), zinc compounds (43 million pounds), and aluminum oxide (fibrous forms) (31 million pounds). The majority of the releases of these three chemicals were to RCRA subtitle C landfills. Together, these three chemicals make up 44.6% of the total releases for these sectors.

Note: New industries include forms with only SIC codes in new industries, and forms with a combination of SIC codes in the range 20-39 and in the new industries from facilities not reporting before 1998.

1999 Chemical Release Data--Original (Manufacturing) Industries

Q What are the top 3 sectors for total releases in the original (manufacturing) industries?

A The top 3 sectors for total releases include: primary metals sector (SIC code 33), chemical manufacturing sector (SIC code 28), and the paper sector (SIC code 26). The primary metals sector reported 684 million pounds of total releases, or 28.0% 2.4 billion pounds reported by the original (manufacturing) industries. The chemical manufacturing sector reported 671 million pounds of total releases, or 27.5%, of the 2.4 billion pounds reported by the original (manufacturing) industries. The paper sector reported 226 million pounds of total releases, or 9.3% of the 2.4 billion pounds reported by the original (manufacturing) industries.

Q What are the top 3 chemicals for total releases in the original (manufacturing) industries?

A The top three chemicals for total releases were zinc compounds, nitrate compounds, and methanol. Facilities reported 331 million pounds of total releases of zinc compounds (39.2% was released to land on-site and 58.7% was released off-site either to land or underground injection), 294 million pounds of total releases of nitrate compounds (230 million pounds or 78.1% was released to surface water), and 205 million pounds of total releases of methanol (89.6% was released to air).

Note: Original industries include forms with only SIC codes 20-39, forms with no SIC codes in newly added industries, and forms with a combination of SIC codes in the range 20-39 and in the added industries from facilities reporting before 1998.]

1998-1999 Chemical Release Data--All Industries

Q What are the general trends in releases between 1998 and 1999?

A Overall, between 1998 and 1999, total releases (including both on-site and off-site releases) from all industries reporting to TRI increased 388 million pounds or 5.3%. This increase in releases can be attributed to one mining facility reporting a 615 million pound increase in total releases in 1999. Factoring out the increase in releases from this one facility, total releases for all industries would have decreased from 7.4 billion pounds to 7.2 billion pounds, or a 3.1% decrease.

1998-1999 Chemical Release Data--New Industries

Q What are the general trends in releases for the new industry sectors reporting to TRI? Which sectors increased and which decreased?

A In 1999, new industry sectors reported 5.4 billion pounds of total releases (increasing 448 million pounds or 9.0% from 1998). Factoring out the increase in releases of one mining facility, new industries as a whole would have decreased by 3.3%. Looking at the new industries as a whole, air releases, underground injection, and on-site land releases increased 5.3%, 2.4%, and 10.0%, respectively (factoring out the increase in releases of the one metal mining facility, on-site land releases would have decreased 5.3% between 1998 and 1999). Surface water releases decreased 30.0%. Off-site releases totaled 105 million pounds, increasing 4.7 million pounds or 4.7%.

Q What new industry sectors reported an increase in releases between 1998 and 1999? Which sectors reported a decrease in releases?

A Metal mining, electric utilities, chemical wholesalers, and hazardous waste/solvent

recovery facilities reported increases in releases between 1998 and 1999. Metal mining facilities increased 416 million pounds or 11.7% (due to a onetime increase in release reported by one mining facility). Electric utilities reported an increase of 24.9 million pounds or 2.2% in total releases. Chemical wholesale distributors reported a 435 thousand pounds or 28.3% increase in total releases. Hazardous waste/solvent recovery facilities reported a 7.6 million pounds or 2.7% increase in total releases.

Both coal mining and petroleum bulk terminals reported decreases in releases between 1998 and 1999. Coal mining reported a decrease of 1.3 million pounds or 9.7% in total releases. Petroleum bulk terminals reported a decrease of 246 thousand pounds or 5.5% in total releases.

Q Factoring out the facility reporting a onetime increase in releases in 1999, did the metal mining sector still report an increase in releases between 1998 and 1999?

A One copper mine in Utah reported an increase in releases of 615 million pounds in 1999. 505 million pounds of this total amount were reported as a one-time event (reported as non-production related waste). Factoring out the increase in releases of this one facility, the metal mining sector would have reported a decrease in total releases of 199 million pounds or 5.6% between 1998 and 1999.

Q Electric utilities reported an increase in total releases of 24.9 million pounds or 2.2%. What accounted for this increase in releases?

A The chemical with the largest increase in releases between 1998 and 1999 was hydrochloric acid increasing 60 million pounds (mostly released to air). The top three facilities for increases in releases in the electric utility sector between 1998 and 1999 accounted for 27.7 million pounds of total releases of hydrochloric acid to air. There were 15 facilities reporting greater than 2 million pound increases in releases of hydrochloric acid. Total increases in releases for hydrochloric acid for these 15 facilities between 1998 and 1999 totaled 69.0 million pounds.

Q Chemical wholesalers reported an increase in total releases of 435 thousand pounds or 28.3%. What accounted for this relatively large percentage increase?

A One facility reporting an increase of 437 thousand pounds accounted for this increase in releases. One chemical, methyl acrylate, accounted for this large increase in total releases.

Q Hazardous waste/solvent recovery facilities reported an increase in total releases of 7.6 million pounds or 2.7%. What accounted for this increase?

A The top three facilities reporting increases in total releases between 1998 and 1999 reported increases of 33 million pounds. The top three chemicals reporting increases in

total releases include aluminum oxide (fibrous forms), polychlorinated biphenyls (PCBs), and ammonia. These three chemicals accounted for 24.9 million pounds of increases in total releases.

1998-1999 Chemical Release Data—Original Industries

Q What are the general trends in releases for the manufacturing sectors (original industries) reporting to TRI? Which categories increased and which decreased?

A In 1999, original (manufacturing) industry sectors reported 2.4 billion pounds of releases, decreasing 65 million pounds or 2.6%. On-site releases totaled 2.0 billion pounds decreasing 110 million pounds or 5.3%. Air releases, underground injection, and on-site land releases decreased 7.5%, 4.8%, and 5.9% respectively. Surface water releases increased 15.1 million pounds or 6.3%. Off-site releases totaled 487 million pounds increasing 44.9 million pounds or 10.2% (one facility revised its submission decreasing this amount by approximately 23 million pounds).

Q What sectors and chemicals make up the 15.1 million pounds or 6.3% increase in surface water releases?

A The top three sectors for increases in releases to surface water between 1998 and 1999 in the original (manufacturing) industries include the food sector (9.1 million pounds), the primary metals sector (5.3 million pounds), and the chemicals sector (4.0 million pounds). These three sectors reported 18.4 million pounds of increases in releases to surface water. Nitrate compounds were ranked first for increases in releases to surface water between 1998 and 1999. There were 26 facilities reporting increases in releases to surface water in excess of 500 thousand pounds for nitrate compounds (a total increase of 31.9 million pounds).

Q In 1999, the primary metals sector ranked first and the chemical manufacturing sector ranked second for total releases. What has been the trend in total releases for the primary metals sector and the chemical manufacturing sector over the last two and five years (using the 1995 core set of chemicals)?

A Although releases from the primary metals sector decreased 4.9% between 1998 and 1999, this sector has reported a 20.5% increase in total releases since 1995 (from 568 million pounds in 1995 to 684 million pounds in 1999). Most of the increases in releases occurred between 1995 and 1997 in off-site releases (solidification/stabilization of metals and metal compounds). The chemical sector reported a 2.4% decrease in releases between 1998 and 1999, and a 19.0% decrease in releases between 1995 and 1999 (from 828 million pounds in 1995 to 671 million pounds in 1999). It should be noted that, because phosphoric acid was deleted from the TRI list as of the 1999 reporting year, this trend information excludes phosphoric acid which had accounted for a fairly large volume

of releases for the chemical industry in previous TRI Public Data Release reports.

1988-1999 Chemical Release Data—Original Industries (using the 1988 core set of chemicals)

Q What are the on- and off-site release trends from 1988 to 1999?

A Overall, total releases have decreased 1.5 billion pounds or 45.5% since 1988. On-site releases substantially decreased with air releases making up 1.3 billion pounds of the 1.5 billion pound total decreases in on-site releases. Off-site releases increased 33 million pounds but 23 million pounds of this increase was due to an EPA data entry error (the actual increase in total off-site releases is anticipated to be approximately 10 million pounds).

Note: Due to an EPA data entry error, three chemical reporting revisions for 1999 by one facility, the US Army Letterkenny Depot in Chambersburg, PA, reporting in the original industry sector were not included in these Q&As. The effect of the revisions is to change the facility's total releases for zinc compounds from 17,147,839 pounds to zero and lead compounds from 60,123 pounds to zero. The facility anticipated revising total releases for manganese compounds from 5,584,900 pounds to below 500 pounds.

Only the sections entitled *1998-1999 Chemical Release Data—Original Industries* and *1988-1999 Chemical Release Data—Original Industries* include transfers to disposal sent to other TRI facilities that reported the amount as an on-site release. See the Q&A above for more information relating to double-counting.

Summary of 1999 Waste Management Data

1998-1999 Chemical Waste Management Data—All Industries

Q What are the general trends in waste management for all industries (both the original and new industries) between 1998 and 1999?

A In 1999, a total of 29.5 billion pounds of TRI chemicals in production-related waste was reported as managed. More than three-quarters of the production-related waste was managed by original (manufacturing) industry facilities. Another 12% was reported by metal mines, and electric utilities reported managing 6%.

Overall, production-related waste increased by less than one percent from 1998 to 1999. The original (manufacturing) industries reported an increase of over one percent which was offset by the almost 2% decrease reported by the new industries. Both the original (manufacturing) and new industries reported decreases in quantities released on- and off-site. The overall increase came, primarily, in amounts treated on-site where the original (manufacturing) industries reported an increase of 16% and new industries reported an

increase of 20%.

1995-1999 Chemical Waste Management Data—Original Industries

Q What are the general trends in waste management for the original (manufacturing) industries between 1995 and 1999?

A The amount of total production-related waste increased 2.5% or 563 million pounds from 22.5 billion pounds in 1995 to 23.1 billion pounds in 1999. This increase was driven primarily by on-site recycling and an increase in on-site treatment (increasing 587 million pounds, or 8.1% and 346 million pounds, or 5.3% respectively between 1995 and 1999). Quantities released on- and off-site decreased by 7.9%, from 2.6 billion pounds in 1995 to 2.4 billion pounds in 1999.

Waste Management Background

Q What is waste management?

A Under TRI, a toxic chemical is considered to be managed as a waste if it is released (including disposal), treated for destruction, burned for energy recovery, or recycled. It also includes any toxic chemical shipped off-site to another location for one of these waste management activities. Thus, for purposes of TRI, waste management includes: quantities released to the environment both at the facility and sent off-site for disposal; quantities treated at the facility or sent off-site for treatment; quantities used for energy recovery at the facility or sent off-site for energy recovery; and quantities recycled at the facility or sent off-site for recycling. The amount of chemicals in waste reported includes both waste generated and waste received by the facility. Production-related wastes do not include quantities reported as released to the environment due to one-time events.

Q How accurate are the data on toxic chemicals in waste reported by industry? Aren't there real definitional and reporting issues associated with this data?

A EPA collects the TRI data under the authority of two laws, EPCRA and the PPA (Emergency Planning and Community Right-to-Know Act and the Pollution Prevention Act). When Congress enacted these laws, they made it clear that facilities should provide their best estimates, but that EPA should not require facilities to conduct any additional monitoring or testing to comply. As such, the data reported represent facility estimates based on the best available information. Therefore, the accuracy of the data is dependent on the quality and quantity of data used by each facility.

Under the Pollution Prevention Act, Congress authorized EPA to collect certain source reduction and waste management information. In 1991, EPA issued a proposal that would have provided the regulated community with regulatory definitions and reporting guidance

to implement the PPA. However, this proposal raised complex issues that were not easily resolved, given the wide variety of manufacturing facilities that exist in the United States. To help resolve these issues, EPA has engaged in a series of formal and informal discussions with all stakeholders. Based on these discussions, and the experience gained from several years of collecting data under the PPA, the Agency is working on an amended proposal. Until EPA promulgates regulations, facilities may report based on their interpretation of the statutory requirements.

TRI Data Quality

Q What are the top things that EPA does to insure that the TRI data are of high quality?

- A**
- EPA provides extensive compliance assistance, including industry training workshops, to both the manufacturing industry and the new industry sectors.
 - EPA assesses the quality of the data through technical surveys and uses the results to work with the industry to improve the quality of the reported data.
 - EPA's Data Entry Process is virtually (99.9%) error free. A key component of this process is double key entry.
 - Further double check key data elements, such as facility identification to make sure that they were entered properly.
 - EPA automatically checks for 60 data errors that may be in the information sent in by the facility.
 - After EPA enters the TRI data, it sends the facility a copy of the entered data for review.
 - EPA sends each state a list of all the facilities that submitted a TRI report to EPA and all the chemicals that they reported so that the states can check this against the TRI reports they directly receive.
 - EPA sends each state a list of the 100 facilities with the largest releases in that state. EPA asks the state to make sure that there are no facilities included or excluded that should not be. EPA follows up with telephone calls to the states.
 - Each year EPA calls facilities that report large increases or decreases in their releases from one year to the next. This year, in addition to those calls, EPA reviewed and called the facilities with the largest quantities of releases and total production-related waste. EPA also called a set of facilities that were drawn more

randomly from the list of all reporting facilities. Headquarters called a total of 460 facilities. The regions supplemented the headquarters data quality effort with their own reviews of the data and calls to facilities not covered by headquarters.

More Efficient Data Collection (*TRI-ME*)

Q What is the Agency doing to make data collection more efficient? What is *TRI-ME*?

A EPA is carrying out a number of activities to make data collection more efficient.

EPA is developing a software program entitled *TRI Made Easy* or *TRI-ME*, which is designed to simplify facility reporting. By leading TRI reporters through easy-to-follow input screens, *TRI-ME* will eliminate a significant amount of analysis required to determine whether a facility meets TRI reporting thresholds. For those facilities that meet TRI reporting thresholds, *TRI-ME* will aid the user in completing the appropriate reporting forms. For those facilities required to report, the software provides the user with links to guidance for each data element on the reporting forms. For reporting year 2000, *TRI-ME* distribution will be limited to a pilot release.

EPA is also working to enable reporting facilities to electronically send the completed Form R/A to EPA via the Internet.

TRI Assistance Library (*TRIAL*)

Q What is *TRIAL*?

A TRI Assistance Library (*TRIAL*) is a Windows-based help utility containing key policy and guidance documents such as the EPCRA Section 313 Questions and Answers book, and industry-specific and chemical-specific regulatory guidance documents. *TRIAL* is a new feature added to the Automated TRI Reporting Software (*ATRS*) for RY 2000.

Electronic Reporting to TRI

Q What percentage of the current TRI reporting community is reporting electronically?

A TRI facilities may report electronically by using EPA's *Automated TRI Reporting Software (ATRS)* or other reporting software, and submitting their facility's data on a 3-1/2 inch diskette. *ATRS* both simplifies facility reporting and improves data quality and processing. Approximately 73% of all TRI reports were submitted electronically in 1999. In May and June of 2000, EPA conducted a web-based electronic reporting pilot with about 90 facilities submitting Reporting Year 1999 data. EPA plans to expand the pilot significantly for Reporting Year 2000 submissions and include the ability to electronically

sign submissions.

In addition, the Agency is developing *TRI-ME* -- interactive, user-friendly, intelligent reporting software to assist facilities in determining their compliance obligations under EPCRA section 313 and then guide the user in completing the forms through a series of questions and answers and worksheets.

Underground Injection (UIJ)

Q Why does EPA continue to treat underground injection as a release to the environment?

A EPA believes that EPCRA clearly identifies underground injection as a release to the environment. However, EPA does recognize the difference in the management and regulatory oversight provided by the Underground Injection Control program of Class I wells from other forms of injection into the land. As a consequence, beginning with the 1996 reporting year, EPA redesigned the Form R to distinguish Class I injection well data from data for other classes of injection wells in a way that makes that distinction clear for the public.

Federal Facilities

Q Why did the number of Federal facilities reporting to TRI drop from 1994 to 1999? (193 federal facilities reported in 1994 and 127 federal facilities reported in 1999)

A There appear to be a variety of reasons for this change. As a result of Executive Order 13148, as well as internal policies, Federal Agencies are pursuing pollution prevention activities to lower the amount of toxic chemicals used at Federal facilities. An example is the Defense Logistics Agency, which changed the formulation of fuels stored at its bulk storage facilities. Other reasons include changes in reporting requirements for ammonia and sulfuric acid and hydrochloric acid, as well as military base closures.

Q Why were there so few reports filed by EPA in 1999?

A Most EPA facilities do not handle or generate significant quantities of TRI chemicals. EPA facilities voluntarily used a lower reporting threshold of 8,000 pounds instead of the regulatory 10,000 pound use threshold. Only one facility, the National Fuel and Vehicle Emissions Laboratory in Ann Arbor, Michigan, exceeded that lower reporting threshold and filed TRI reports.

Q Did any federal facilities report to TRI prior to 1994?

A Prior to the 1994 reporting year government owned government operated (GOGO) facilities were not required to report by law, but some reported voluntarily. In the 1993 reporting year, 36 federal facilities voluntarily reported to TRI including: 23 facilities from the Department of Energy (DoE), nine from the Department of Defense (DoD), two from the National Aeronautics and Space Administration (NASA), and two from the U.S. Enrichment Corporation (USEC). Government-owned facilities operated by contractors always have been subject to EPCRA and have had to report if they exceeded thresholds.