



# At a Glance

## Why We Did This Project

We conducted this audit to determine the extent to which late reporting of Toxics Release Inventory data impacts the annual TRI National Analysis.

In 1986, Congress passed the Emergency Planning and Community Right-to-Know Act to provide the public with information about toxic chemical releases and support emergency planning. Facility owners or operators report to the U.S. Environmental Protection Agency by July 1 each year on each toxic chemical that they used in quantities exceeding the established toxic chemical threshold for the preceding calendar year. The chemical information collected and reported through the TRI provides citizens with the means to better understand pollution sources in their communities.

### This report addresses the following:

- *Operating efficiently and effectively.*

### This report addresses a top EPA [management challenge](#):

- *Complying with internal control (data quality).*

Address inquiries to our public affairs office at (202) 566-2391 or [OIG\\_WEBCOMMENTS@epa.gov](mailto:OIG_WEBCOMMENTS@epa.gov).

List of [OIG reports](#).

## ***Data Used for Annual Toxics Release Inventory National Analysis Are 99 Percent Complete, but EPA Could Improve Certain Data Controls***

### What We Found

TRI release data that were reported late to the EPA accounted for an average of less than one-half of 1 percent, or 70.3 million of the 15.2 billion total pounds reported in the TRI annual reporting analysis from 2013 through 2016. The EPA publishes the annual TRI National Analysis to summarize the submitted TRI data, trends in the data, and findings from the perspective of human health and environmental protection. Although the official deadline for facilities to report data is July 1, the EPA accepts data submissions until it “freezes” the dataset in mid-October. For the purposes of this report, we considered data late if they are reported after the Agency freezes the dataset. The annual reports from 2013 through 2016 are based on a dataset that has more than 99 percent of the data.

The EPA’s efforts to follow up with late reporters prior to “freezing” the data contributed to more complete data.

Communities located near the facilities that reported late may not have access to current TRI data to make informed decisions. To improve data collection, the EPA prompts the facilities that missed the July 1 deadline to comply with TRI reporting requirements. Since this good practice is not documented as a standard operating procedure, the EPA runs the risk of not replicating this practice yearly.

We also identified control weaknesses concerning the reporting of the final disposition of chemicals that facilities transferred to a publicly owned treatment works, or POTW. Reporting facilities can edit the default “POTW distribution percentages” that the EPA uses to estimate the final disposition of chemical quantities transferred to a POTW. The EPA, however, cannot verify the validity of the data since the reporting facility is not required to provide evidence to the Agency supporting the edit. Current practices do not provide adequate controls to ensure the validity and accuracy of TRI data for chemicals transferred to POTWs, especially since facilities could alter the distribution percentages to report fewer chemicals released into the environment. Facilities’ edits of certain TRI transfer data from 2014 through 2017 reduced the net pounds reported released by 3,354,235 pounds, or approximately 19 percent.

### Recommendations and Planned Agency Corrective Actions

We recommend that the EPA continue to follow up with facilities that have not reported their data before the freeze date, analyze the impact of late-reported data, and establish controls over POTW distribution percentage edits to validate the accuracy of the data. In its response and subsequent communications, the Agency agreed with the recommendations and provided estimated milestone dates for its planned corrective actions. All recommendations are resolved.