

2012 TRI National Analysis Questions and Answers

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Overview of the 2012 Data

Q: What are the highlights of this year's data analysis?

The 2012 TRI data show that 3.61 billion pounds of toxic chemicals were disposed of or released into the environment (i.e., air, water or land), a 12 percent decrease from 2011. The difference is mainly due to decreases in reported land disposal at metal mines, which typically involve large facilities handling large volumes of material. This year a decline in releases at only a few facilities had a large impact on the decline in total releases seen nationally. These facilities stated to EPA that small changes in the chemical composition of the ore and waste rock being mined led to big changes in the amount of toxic chemicals reported. Changes in composition can have an especially pronounced effect on TRI reporting because of a regulatory exemption that allows facilities to not report a chemical if a chemical's concentration falls below a certain limit, regardless of the total quantity of that chemical present in the rock. Therefore, reported volumes from some facilities may not reflect actual volumes of land disposal given the use of the exemption.

Air releases decreased by 8% from 2011 to 2012. Most of the decline occurred in hazardous air pollutant (HAP) emissions, such as hydrochloric acid, at electric utilities. Likely reasons for the decreases seen over the past several years include installation of control technologies at coal-fired power plants and a shift from coal to other fuel sources.

Releases into surface water decreased 3% and releases to land decreased 16% since 2011, with the latter again due primarily to the metal mining sector, as explained above.

The 2012 reporting year was the first year that TRI required information on hydrogen sulfide from facilities. For 2012, 484 facilities submitted TRI forms covering 25.8 million pounds of disposal or other releases, 79% (20.3 million pounds) of which was air releases, mainly from paper, petroleum, and chemical manufacturing facilities.

Q: How many facilities reported for 2012? Why is it different from the number last year?

A total of 21,024 facilities reported to TRI for 2012, a 2% decrease from 2011. This continues the downward trend from previous years in the number of facilities reporting.

Background:

There are many reasons that facilities in TRI-covered sectors may report to TRI one year and not report the next year; each of these reasons likely accounts for some portion of the reduction in facilities.

- Each year a facility must evaluate whether they meet the criteria to report to TRI. If such a facility has at least 10 employees and manufactures, processes or otherwise uses the threshold amount of the chemical, it must report.

- Some facilities have a reduction in employees or in production that causes them to drop below reporting thresholds.
- Some facilities have stopped production, either temporarily or because the facility has closed.
- Some facilities have found ways to reduce releases or have changed their processes so that they no longer use any toxic chemicals on the TRI list.
- Some facilities may have failed to report to TRI even though they fit the criteria. EPA will review these facilities for appropriate follow-up action.

While there was a decrease in the total number of facilities reporting, there were 1,292 facilities that reported for 2012 that did not report for 2011.

Note: Some facilities reported after the deadline and EPA was not able to include them in this analysis. EPA will evaluate those facilities for appropriate follow up action.

Q: What is new in the presentation of the data this year?

This year's National Analysis includes expanded information on pollution prevention measures undertaken at TRI facilities. The adoption of such "source reduction" activities can help eliminate waste at the source. The National Analysis presents the types of source reduction activities undertaken in 2012 and how waste and releases have declined at facilities undertaking such activities from 2003 to 2012.

For the first time this year's analysis includes a presentation of data from EPA's Chemical Data Reporting (CDR) rule, which collects information about the manufacture (including import) and use of chemicals in commerce. The CDR data and the TRI data are compared for the chemical ethylbenzene as an example of how TRI and CDR data can be used together for a more complete picture of the chemical's production and use.

This year's National Analysis also includes expanded information on greenhouse gas emissions reported to EPA's Greenhouse Gas Reporting Program (GHGRP). The analysis includes a year-to-year comparison of how GHG and TRI emissions changed from 2011 to 2012.

As mentioned above, the 2012 reporting year was the first year that facilities were required to provide information on hydrogen sulfide. Hydrogen sulfide is a chemical commonly produced through industrial operations, petroleum and natural gas extraction and refining, and from the breakdown of organic matter. It is associated with chronic health effects in humans such as neurotoxic and upper respiratory effects as well as adverse effects in aquatic organisms. While it was added to the EPCRA Section 313 list of toxic chemicals in a 1993 rulemaking, EPA issued an Administrative Stay in 1994 that deferred reporting while the Agency completed further evaluation of the chemical. EPA announced it was lifting the stay on hydrogen sulfide in 2011, with reports due for reporting year 2012.

Continuing last year's in-depth look at selected industry sectors, this year's National Analysis includes profiles of chemical manufacturing, electric utilities, metal mining and computer/electronics manufacturing. These analyses are displayed in the 2012 TRI National Analysis Overview document.

In addition, the National Analysis website (www2.epa.gov/toxics-release-inventory-triprogram/2012-tri-national-analysis) continues to feature a presentation of reported disposal or other releases in some of the most populous urban communities (Metropolitan Statistical Areas) in the United States, and this year also includes smaller communities (Micropolitan Statistical Areas) so that a total of 891 communities are presented. The website also features reported disposal or other releases in the largest aquatic ecosystems, like the Chesapeake Bay and the Great Lakes, and a tribal lands analysis which includes the total disposal or other releases on Indian country and Alaska Native Villages.

Q: Is the change in disposal or other releases from 2011 to 2012 comparable to that of prior years? Why did the change occur?

Total disposal or other releases decreased 12% (a 483-million-pound reduction) from 2011 to 2012. This year's decrease reverses the upward trend since 2009. Much of the change from year to year is due to reporting by metal mines, which accounted for 40% of all disposal or other releases for 2012. Other industry sectors reporting overall decreases included electric utilities and primary metals.

This year's decrease is due in part to this year's decrease of 423 million pounds from metal mines. In 2012, two metal mining facilities, one in Alaska and one in Nevada, accounted for over half of the overall decrease in disposal or other releases for 2012 across all reporters. These facilities cited the following as the main reasons for their decreases: changes in ore body composition, and being eligible for the *de minimis* exemption for reporting certain chemicals.

Note: When looking at change from 2011 to 2012, the data for hydrogen sulfide for 2012 are not included because no information for the chemical was collected in prior years.

Q: How does EPA regulate metal mining waste and what health impacts/risks are associated metal mining waste?

Mining wastes include waste generated during the extraction, beneficiation, and processing of minerals. At some facilities disposal of these wastes has caused significant environmental harm. Most [extraction and beneficiation](#) wastes from hardrock mining (the mining of metallic ores) and 20 specific mineral processing wastes are exempt from hazardous waste regulations under Subtitle C of the Resource Conservation and Recovery Act (RCRA). Mining and mineral processing plants remain subject to applicable federal environmental regulations (such as the Clean Air Act, the Clean Water Act, CERCLA, and EPCRA) and applicable state regulations. For more information, visit EPA's mining waste webpage: <http://www.epa.gov/osw/nonhaz/industrial/special/mining/>.

Q: What about persistent, bioaccumulative, and toxic (PBT) chemical releases?

There was a 21% decrease in disposal or other releases of persistent, bioaccumulative, and toxic (PBT) chemicals overall from 2011 to 2012. Lead and lead compounds account for 98% of the total disposal or other releases of PBTs; therefore, the data are more meaningful in the context of specific PBT chemicals.

Lead and Lead Compounds

Total disposal or other releases of lead and lead compounds decreased 22% in 2012. Lead accounts for 98% of the total disposal or other releases of PBTs.

Total disposal or other releases of lead and lead compounds are affected greatly by the mining sector:

- Lead is sometimes mined for its own value and sometimes is a byproduct resulting from mining other metals.
- Metal mines accounted for 91% of total disposal or other releases of lead and lead compounds in 2012.

The metal mining sector had a decrease of 23% in total disposal or other releases from 2011 to 2012 for lead and lead compounds.

- Without the metal mining sector, total disposal or other releases of lead and lead compounds decreased by 10% from 2011 to 2012.
- Air releases of lead and its compounds increased 12% from 2011 to 2012, mainly due to a textile mill that did not report lead and lead compounds for 2011.

Mercury and Mercury Compounds

- From 2011 to 2012, total disposal or other releases for mercury and mercury compounds increased 2%. Air emissions of mercury and mercury compounds decreased by 10%.

- The metal mining sector accounted for 93% of the total disposal or other releases of mercury and mercury compounds in 2012. The 2% increase in mercury and mercury compounds overall was mainly due to one Nevada facility in this sector which reported a 76% increase in production associated with mercury compounds. Most of the mercury at this facility went to other land disposal.
- Electric utilities accounted for 60% of all mercury and mercury compound releases to air. Electric utilities reported a 17% decrease in mercury air releases.
- The primary metals and cement sectors were the next biggest contributors to air releases of mercury in 2012. From 2011 to 2012, the primary metals sector increased air releases of mercury by 10% and the cement sector's air releases of mercury increased by 4%.

Background:

There is no mercury mining *per se* in the United States. Mercury releases are a byproduct associated with mining other metals, especially gold and silver.

Dioxin and Dioxin-like Compounds

Total disposal or other releases of dioxins increased 8% from 2011 to 2012. Air releases of dioxins decreased by 9%. Total disposal or other releases of dioxins for 2012 were about 58,672 grams, including almost 1,157 grams of air releases.

- The chemical manufacturing sector accounted for 63% of total disposal or other releases of dioxins in 2012. They reported a 12% decrease from 2011 to 2012.
- The primary metals sector reported the second largest total in 2012 and had a 69% increase in total disposal or other releases of dioxins from 2011 to 2012, primarily due to one smelter in Utah that increased its on-site land disposal. Most of this facility's on-site land disposal of dioxin and dioxin-like compounds went to other surface impoundments. Air releases from this sector increased by 15%, primarily due to one smelter in Michigan that recycles aluminum.
- Electric utilities accounted for 34% of all releases to air of dioxins in 2012 and reported a decrease of 8% from 2011 to 2012.

Background:

Dioxins are not created intentionally, but are formed during some high-temperature processes such as smelting and recycling metals. Different materials and temperature levels can change the amount of dioxin that is formed in the process.

Polychlorinated Biphenyls (PCBs)

PCBs total disposal or other releases decreased 27% from 2011 to 2012.

Background:

Because PCBs are no longer manufactured or used in new products, the disposal or other releases of PCBs represent amounts that are being cleaned up or capacitors and transformers being taken out of service and properly disposed of in facilities that minimize risk to human health and the environment. PCB total disposal or other releases typically fluctuate from year to year based on how many significant cleanup activities are underway or how many PCB transformers are removed from service.

Q: What are dioxin TEQs and why is EPA including them in the analysis?

There are 17 different chemicals in the category of dioxins and dioxin-like compounds in TRI. These different chemicals are called dioxin "congeners," and they are all very toxic. However, some of them are much more toxic than others. TEQ (Toxic Equivalency) values provide a weighted sum of dioxin congeners for each facility so that there is one number that takes into account both quantity and toxicity. This number helps in understanding the relative hazard from dioxins; however, it does not compare the risk from different facilities, because it does not take into account human exposure to the chemical. TEQs will allow the public to make more informed environmental decisions within their communities. Expressing dioxin releases and waste management information in grams TEQ also permits easier comparisons between TRI data and other EPA and international data. For more information, see TRI's webpage on the

dioxin TEQ rule: <http://www2.epa.gov/toxics-release-inventory-tri-program/tri-dioxin-and-dioxin-compounds-toxic-equivalency-teq>.

Various industry sectors may dispose of or otherwise release very different mixes of dioxin congeners. Two industry sectors accounted for about 90% of both the grams and grams-TEQ of dioxin disposed of or otherwise released in 2012; however, their ranking in terms of percentage of the total is quite different for grams and grams-TEQ. The chemicals sector reported 65% of total grams of dioxins in 2012 but ranked behind the primary metals sector in terms of grams-TEQ. The primary metals sector ranked second in terms of grams, reporting 26% of grams of dioxins but first in terms of grams-TEQ.

Q: What about known or suspected carcinogens?

A carcinogens' category of analysis was added to the EPA's analysis of TRI data in 2005 at the request of stakeholders.

- In 2012, about 65% of TRI facilities reported disposal or other releases of carcinogens.
- Total disposal or other releases of carcinogens decreased 25% from 2011 to 2012 compared to a decrease of 12% for all TRI chemicals.
- Air releases of carcinogens increased by 5% from 2011-2012, but decreased by 47% from 2003-2012.
- In 2012, lead and lead compounds accounted for 62% of the disposal or other releases of carcinogens.
- Over 84% of carcinogens were released to various forms of land disposal in 2012. Over 76% of the total was to on-site surface impoundments, landfills, and other land disposal that were not RCRA Subtitle C facilities.
- Metal mines accounted for 69% of the disposal or other releases of carcinogens in 2012; lead accounted for most of these disposal or releases and lead from metal mines accounted for 78% of the surface impoundments and land disposal that were not RCRA Subtitle C sites of all carcinogens.

Background:

The list of known or suspected carcinogens is actually a list of chemicals derived from the three sources: National Toxicology Program (NTP), International Agency for Research on Cancer (IARC) and/or 29 CFR 1910, Subpart Z, Toxic and Hazardous Substances, Occupational Hazardous Safety and Health Administration (OSHA). If the chemical is listed according to the criteria on any of the three lists, it is included as a carcinogen under TRI. Sixteen carcinogens were added to the TRI list for 2011.

Q: What about hydrogen sulfide?

Reporting year 2012 was the first year TRI required information on hydrogen sulfide. For 2012, 484 facilities reported with the most reporters being in the petroleum refining and petroleum products sector. Total disposal or other releases of hydrogen sulfide for 2012 were 25.8 million pounds. Air releases accounted for 79% (20.3 million pounds). The paper and paper products sector accounted for 64% of total air releases and chemical manufacturing accounted for 17% of total air releases.

Other sectors that reported on hydrogen sulfide include facilities in food/beverage/tobacco and plastics and rubber sectors. For facilities classified in NAICS 211112, Natural Gas Liquid Extraction, reporting is only required for facilities that recover sulfur from natural gas, that is, the facilities are "manufacturing" sulfur and for TRI purposes are classified in the chemical manufacturing sector.

Q: Which industry sectors reported decreases in total disposal or other releases from 2011 to 2012?

Industry sectors with the largest decrease included:

- The metal mining industry reported a 23% decrease (423 million pounds)
- Electric utilities reported a 16% decrease (97 million pounds)

- The primary metals industry reported an 8% decrease (30 million pounds)

Q: Which industry sectors reported increases in total disposal or other releases from 2011 to 2012?

Industry sectors with the largest increase included:

- The chemical manufacturing industry reported a 9% increase (45 million pounds)
- Hazardous waste management facilities reported a 25% increase (32 million pounds)
- The petroleum refining and petroleum products sector reported an 8% increase (5.3 million pounds)

Q: What is EPA doing to help these sectors decrease releases?

EPA's Pollution Prevention Program helps identify pollution prevention (P2) options in all industry sectors through a variety of assistance and information-sharing programs. For instance, the Economy, Energy and Environment (E3) initiative helps manufacturers become more sustainable, and Design for the Environment (DfE) helps companies use safer chemicals and technologies. In addition, the TRI program is making its pollution prevention information more accessible to promote the implementation of effective P2 practices. To learn more go to <http://www.epa.gov/tri/P2>.

Q: Which industry sectors reported decreases in air releases from 2011 to 2012?

Industry sectors with the largest decrease in air releases included:

- Electric utilities with a 25% decrease (65 million pounds)
- The primary metals sector with a 6% decrease (2.5 million pounds)
- The printing and publishing sector with a 27% decrease (2.2 million pounds)
- The stone/clay/glass sector with an 10% decrease (1.5 million pounds)

Q: Which industry sectors reported increases in air releases from 2011 to 2012?

Industry sectors with the largest increase in air releases included:

- The chemical manufacturing sector with a 2% increase (3.8 million pounds)
- The transportation equipment sector with an 8% increase (2.0 million pounds)
- The petroleum refining and petroleum products sector with a 5% increase (1.8 million pounds)
- The plastics and rubber sector with an 5% increase (1.5 million pounds)

Q: Which industry sectors reported decreases in surface water discharges from 2011 to 2012?

Industry sectors with the largest decreases in surface water discharges included:

- Facilities with no TRI NAICS code (mainly Federal Facilities) with a 30% decrease (4.8 million pounds)
- The primary metals sector with a 9% decrease (3.5 million pounds)
- The chemical manufacturing sector with a 3% decrease (1.1 million pounds)

Q: Which industry sectors reported increases in surface water discharges from 2011 to 2012?

Industry sectors with the largest increases in surface water discharges included:

- The petroleum refining and petroleum products sector with a 10% increase (2.1 million pounds)
- The stone/clay/glass sector with a 20% increase (416 thousand pounds)
- The paper and paper products sector with a 1% increase (254 thousand pounds)

Q: What accounts for the 8% decline in disposal or other releases from 2003 to 2012?

Most industry sectors covered by TRI had decreases in their total disposal or other releases from 2003 to 2012. The largest decreases occurred in the electric utility, primary metals, and hazardous waste management sectors. Within the electric utility sector, which had the largest decrease (52% from 2003 to 2012), likely reasons for the decrease include a shift from coal to other fuel sources and installation of control technologies at coal-fired power plants.

Federal Facilities

Q: How did federal facilities fare this year?

Total disposal or other releases from federal facilities decreased 30% from 2011 to 2012. The Tennessee Valley Authority (TVA) electric utilities reported 51% of the total disposal or other releases from federal facilities for 2012 and a 29% (11.3 million pounds) decrease from 2011 to 2012.

Many federal facilities that report to TRI are national defense sites. Department of Defense facilities accounted for 42% of total disposal or other releases from federal facilities for 2012. They reported a 28% (9.0 million pounds) decrease from 2011. These facilities are required to report to TRI even though they do not fit into the industry categories that normally report to TRI because they are federal facilities.

For 2012, 441 federal facilities reported more than 54 million pounds of total on- and off-site disposal or other releases and over 191 million pounds of total production-related waste managed.

We received 1,274 forms from federal facilities, almost all of which were Form Rs (1,265).

- 67% of the forms came from DOD facilities.
- 15% of the forms came from TVA facilities.
- EPA submitted 6 TRI forms for 1.3 million pounds of waste, all of which was from site cleanup.

General

Q: What factors should I consider when using TRI data?

Users of TRI information should be aware that TRI release estimates alone are not sufficient to determine human exposure to toxic chemicals or to calculate potential risks to human health and the environment. Different chemicals can pose different health hazards including cancer, neurological hazards, respiratory hazards, developmental hazards, etc. In addition, chemicals can have these different effects at different concentrations of exposure.

TRI data, in conjunction with other information, such as the toxicity of the chemical, the release medium, and site-specific conditions, can be used as a starting point in evaluating exposures that may result from releases of toxic chemicals.

Factors that users of TRI data might consider include:

- Toxicity of the chemical
- Exposure
- Bioconcentration of the chemical in the food chain
- Type of disposal or release (environmental medium)
- Fate and transport of the chemical in the environment
- Type of off-site facility receiving the chemical and the efficiency of its waste management practices
- On-site waste management of the toxic chemical

TRI Chemical Hazard Information Profiles (TRI-CHIP) is a tool that EPA has developed to provide critical effects toxicity information to the public and is available at <http://www.epa.gov/tri/tridata/>. More information relating to the factors to consider when using TRI data is also available at that site.

Q: Should I worry about releases in my community?

When using TRI data one should be aware that a release of toxic chemicals does not automatically mean that local communities are at risk. Large release numbers do not necessarily mean there is a large risk, nor do small releases necessarily mean there is a low risk. "Disposal or other releases" represent a wide variety of management methods. These range from highly controlled disposal, such as in hazardous waste landfills, to uncontrolled releases due to accidental leaks or spills. Many releases reported to TRI are subject to permits and/or environmental standards that establish emissions limits under Federal or State laws such as, for example, air permits issued under the Clean Air Act. Other factors, such as exposure to the release, route of exposure (e.g., breathing, via skin), bioavailability from the exposure route, and sensitivity of exposed individuals to effects caused by a toxic chemical must be considered before any judgments regarding risk can be made.

However, TRI data can provide lists of the top facilities with the largest disposal or other releases, which can be used as screening tools to identify facilities that may warrant a closer examination. This closer examination should include considering factors mentioned above like toxicity of chemicals and potential exposure. In these cases TRI data should be supplemented with data from other sources.

Q: What is total production-related waste managed and why does EPA include information about this number as well as total disposal or other releases?

Total production-related waste managed represents a focus on management of toxic chemicals rather than only on their final disposition. It includes reporting for on- and off-site recycling, energy recovery, and treatment as well as on- and off-site disposal or other releases. Total production-related waste managed represents how facilities are managing their toxic chemicals and counts these chemicals each time they are managed whether that is by recycling, energy recovery, treatment or disposal or other releases.

From 2003 to 2012, total production-related waste managed by TRI facilities declined by 14% (more than 3.5 billion pounds). From 2011 to 2012, the total production-related waste managed decreased by 4% (974 million pounds). From 2011 to 2012, facilities decreased the quantity of TRI chemicals recycled by 7%, the amount treated by 1%, and the quantity disposed of or otherwise released by 13%, but the amount recovered for energy increased by 8%.

Looking at production-related waste over time can help track industry progress in reducing waste generation and in moving towards safer waste management methods. For example, EPA encourages facilities to first eliminate waste at its source but, for waste that is generated, the preferred management methods are recycling, followed by burning for energy recovery, treating, and, as a last resort, disposing of or otherwise releasing the waste. The goal is that, when possible, waste management techniques will shift over time from disposal or other releases toward the preferred techniques in the waste management hierarchy. These waste management priorities are illustrated in the waste management hierarchy established by the Pollution Prevention Act of 1990. Table 1 shows the percent of the total production-related waste dedicated to each waste management practice in 2003, 2011 and 2012.

Table 1. Percent of total production-related waste recycled, used for energy recovery, treated or disposed of or otherwise released

	2003	2011	2012
Quantity Recycled	36.1%	38.4%	37.4%
Quantity Used for Energy Recovery	13.1%	10.9%	12.4%
Quantity Treated	32.5%	32.3%	33.5%
Quantity Disposed of or Otherwise Released	18.3%	18.3%	16.7%

Q: What is the difference between Form R and Form A?

Form R provides details about releases and other waste management (e.g., total quantity of releases to air, water, and land; and on- and off-site recycling, treatment, and combustion for energy recovery). Form A provides the name of the chemical and certain facility identification information. Form A can be used by the public as a “range report,” i.e., an indication that the facility manages between 0 and 500 pounds of a non-PBT chemical as waste. Several chemicals may be reported on one Form A; only one chemical may be reported on each Form R submission.

From 2011 to 2012, Form Rs decreased by less than 2% while the number of Form As decreased by just more than 2%.

Q: Do the TRI data reflect releases resulting from the British Petroleum offshore oil well in the Gulf of Mexico?

No. Under section 313 of the Emergency Planning and Community Right-to-Know Act, the TRI reporting requirements apply only to facilities in industrial sectors designated by certain North American Industrial Classification System (NAICS) codes. Facilities that extract crude petroleum or natural gas from the earth, such as the British Petroleum offshore oil well facility in the Gulf of Mexico, are classified in NAICS 211111, which is not currently subject to TRI reporting requirements. For a list of all TRI-covered NAICS categories please see the North American Industry Classification System (NAICS) Codes on the TRI Reporting Web site available at: <http://www2.epa.gov/toxics-release-inventory-tri-program/my-facilitys-six-digit-naics-code-tri-covered-industry>.

Q: Do the TRI data reflect releases from hydraulic fracturing?

No. Under section 313 of the Emergency Planning and Community Right-to-Know Act, the TRI reporting requirements apply only to facilities in industrial sectors designated by certain North American Industrial Classification System (NAICS) codes. Facilities that extract crude petroleum or natural gas from the earth, including companies that extract natural gas through hydraulic fracturing, are classified in NAICS 211111, which is not currently subject to TRI reporting requirements. For a list of all TRI-covered NAICS categories please see the North American Industry Classification System (NAICS) Codes on the TRI Reporting Web site available at: <http://www2.epa.gov/toxics-release-inventory-tri-program/my-facilitys-six-digit-naics-code-tri-covered-industry>.

Q: Do the TRI data reflect releases from the Freedom Industries facility spill in West Virginia?

No. The TRI Program does not require reporting on 4-methylcyclohexane methanol (MCHM), the chemical involved in the spill. Additionally, the latest reporting year available in TRI is 2012, and the spill occurred in 2014.