



# **A Federal Agency's Path to TRI Reporting**

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# DOE's Path to TRI Reporting



- In 1991, EPA challenged industry to voluntarily reduce environmental releases through the Voluntary 33/50 Pollution Prevention Program.
- Through this program EPA reached out to industry to bridge the gap between current disposal practices and EPA's pollution prevention hierarchy of preferred options for waste management.
- Success in this program would be tracked through TRI reporting.



# DOE's Path to TRI Reporting



- In 1992, DOE was the first (and only) federal agency to participate in EPA's 33/50 program.
- Some DOE Government-Owned, Contractor-Operated (GOCO) were subject to EPCRA and TRI reporting; other DOE facilities were not.
- DOE directed all of its GOCO facilities meeting the reporting thresholds to report under TRI and strive to meet the 33/50 reduction goals.
- DOE exceeded its 50% TRI reduction goal and received several awards for leadership in toxic chemical reporting and pollution prevention.



# DOE's Path to TRI Reporting



- DOE used TRI and the 33/50 Program as a “hook” to encourage DOE sites to implement chemical inventory and tracking systems needed to facilitate the TRI reporting and pollution prevention and waste minimization activities.
- EPA announced that the DOE agreement to TRI reporting under the 33/50 Program was “a big breakthrough” that would open the door for other Federal agencies to also report TRI releases.



# DOE's Path to TRI Reporting



- In 1993, the President signed EO 12856, *Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements*, which directed all federal agencies to comply with EPCRA and the Pollution Prevention Act of 1990.
- Current EOs 13423, *Strengthening Federal Environmental, Energy, and Transportation Management* and 13514, *Federal Leadership in Environmental, Energy, and Economic Performance* carry forward this requirement.

# DOE TRI Reporting

(Selected years, 1993-2010)

Reporting Year	# of DOE Facilities Reporting/# of Form Rs*	Total On and Off Site Releases*	Top 5 chemicals for Pounds Released**
1993	20/71 Rs	4,469,827	CFC-114 Hydrochloric Acid Methanol Nitric Acid Sulfuric Acid
1999	14/56 Rs	934,207	Hydrochloric Acid Nitrate Compounds Nitric Acid Sulfuric Acid Zinc Compounds
2005	26/66 Rs	2,139,109	Lead Lead Compounds Nickel Nitrate Compounds Zinc Compounds
2010	21/ 52 Rs	4,627,990	Barium Compounds Hydrochloric Acid Lead Lead Compounds Zinc Compounds

\* Data from TRI Explorer

\*\*Data from RTK.net



# DOE Facilities



- DOE facilities include industrial-type plants, the National Laboratories, Operations Offices, and four Power Marketing Administrations.
- The majority of DOE's facilities and laboratories are GOCO facilities.
  - GOCOs have special contracting methods under the Federal Acquisition Regulations such as Management and Operating (M&O) Contracts.



# TRI Reporting at GOCO Facilities



- DOE and its M&O contractors at DOE GOCO facilities are responsible for completing the DOE's TRI reports.
- Some DOE facilities have M&O and other contractors on site that must also report.
- At each site, DOE and the M&O contractor identify the high-volume toxic chemicals from all contractors, consolidate the amounts, and determine reporting thresholds for each chemical.





# TRI Reporting at GOCO Facilities



- For each chemical exceeding the site-wide reporting threshold, all contractors are required to provide their TRI data.
- DOE and its M&O contractors then consolidate the reporting information into a consolidated DOE TRI report which is signed by the appropriate (owner/operator) Manager.



# TRI Reporting Challenges



- This consolidated reporting was routine when done with the PC version of TRI (discontinued in 2010). The desktop software allowed reporting contractors to input their data cumulatively and also take advantage of such benefits as:
  - Enhanced data quality
  - Data validation
  - Use of the Form R Section 8 calculator



# TRI Reporting Challenges



- TRI-MEweb does not allow for consolidation of multiple contractors' data at one DOE site into one set of Federal TRI Reports.
- One contractor will enter data, and when the next contractor enters data, the previous entry is deleted rather than being added cumulatively.
- This has resulted in DOE sites calculating the cumulative reporting outside of TRI-MEweb.



# TRI Reporting Challenges



- Without multiple contractor access to TRI-MEweb, the reporting contractors lose out on its benefits.
- This makes it more challenging to determine where errors originated if, or when, they are found in the consolidated data that are inputs to TRI-MEweb.



# TRI Reporting Challenges



- A possible solution --
- TRI-MEweb does have a feature to allow for multi-establishment reporting where individual establishments provide input into a single set of DOE TRI Reports or report separately.
- It appears that this feature would allow DOE sites to consolidate multiple contractor reports into one TRI Report.



# TRI Reporting Challenges



- DOE has alerted EPA of this issue and we hope that a resolution can be found so that our reporting sites can take full advantage of TRI-MEweb's benefits.



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