



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
INSPECTOR GENERAL

April 8, 2019

**MEMORANDUM**

**SUBJECT:** Management Alert: Certain Toxic Release Inventory Data Disclosed to the Public  
Are Inaccurate  
Report No. 19-N-0115

**FROM:** Charles J. Sheehan, Acting Inspector General

A handwritten signature in blue ink that reads "Charles J. Sheehan".

**TO:** Alexandra Dapolito Dunn, Assistant Administrator  
Office of Chemical Safety and Pollution Prevention

While conducting the *Audit of the Impact of Toxic Release Inventory (TRI) Late Reporters on the EPA's Annual TRI National Analysis* ([Project No. OA&E-FY18-0002](#)), the U.S. Environmental Protection Agency's (EPA's) Office of Inspector General (OIG) decided to issue an immediate management alert informing the agency of our discovery that its TRI data pertaining to releases of hazardous substances from Publicly Owned Treatment Works (POTW) are inaccurate. As a result, the public is not receiving complete and timely information about environmental conditions affecting human health.

**Background**

TRI release data consist of information about toxic chemical releases and pollution prevention activities reported by industrial and federal facilities. In general, [per the EPA website](#), chemicals covered by the TRI are those that cause:

- Cancer or other chronic human health effects.
- Significant adverse acute human health effects.
- Significant adverse environmental effects.

Data from the EPA's public TRI data systems help support informed decision-making by companies, government agencies, nongovernmental organizations and the public. According to EPA staff, the data are also used for research purposes by other worldwide TRI data users, such as other governments, academics and those researching health impacts.

Each year, on or before July 1, U.S. facilities in different industry sectors must report to the EPA how much of each TRI-listed chemical has been released to the environment and/or managed through recycling, energy recovery and treatment. By the second week of October, the EPA takes a snapshot of the data collected and then uses it for the annual "TRI National Analysis." The TRI National Analysis interprets this information and examines trends in releases, waste management practices and pollution prevention activities.

We analyzed data to determine the total number of TRI reporting facilities that may have reported releases late and the corresponding pounds of chemical releases reported late. For our review, we defined “late reported” as those reports that arrived after the mid-October cutoff for the TRI National Analysis.

## What We Found

We examined the EPA’s public TRI release data and the impact of the data on the agency’s annual TRI National Analysis. During our review, the OIG identified discrepancies between (1) the total pounds of chemicals released to the environment as reported in the publicly available TRI data for reporting years 2013–2017 and (2) the information that the EPA provided to us separately on the total pounds of chemicals released.

The OIG’s identification of these discrepancies led to the EPA’s discovery that total release calculations provided by the publicly available database do not properly include the POTW release amounts. **The effect for those that query these data, including nearby communities or worldwide researchers, is that they will not always have accurate or consistent information regarding releases of the hazardous substances from POTWs that may significantly impact human health and the environment.**

The OIG’s audit of the EPA’s TRI data is ongoing, but we found this information to be of sufficient concern to warrant immediate reporting.

## Response Requested

Within 15 days, we request that you provide a response, including actions taken by the Office of Chemical Safety and Pollution Prevention concerning:

- Plans to correct the discrepancies identified.
- Plans to disclose the degree to which the discrepancies identified impact the public reporting of TRI releases.

Please email both an Adobe PDF and Microsoft Word version of your update to [lovingood.tina@epa.gov](mailto:lovingood.tina@epa.gov).

If you or your staff have any questions regarding this report, please contact Kevin Christensen, Assistant Inspector General for Audit and Evaluation, at (202) 566-1007 or [christensen.kevin@epa.gov](mailto:christensen.kevin@epa.gov); or Tina Lovingood, Director, Land Cleanup and Waste Management Directorate, at (202) 566-2906 or [lovingood.tina@epa.gov](mailto:lovingood.tina@epa.gov).

We will post your reply on the OIG’s website at [www.epa.gov/oig](http://www.epa.gov/oig).

cc: Andrew Wheeler, Administrator  
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Ryan Jackson, Chief of Staff  
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