

TRI Back Reporting Trend Addressing Data Inaccuracies

As companies continue to focus on evaluating and revising TRI calculations, an increasing number of facilities are correcting previous TRI submittals. To investigate this trend, Trinity compared the reporting year 2019 data that EPA published on August 19, 2020 to reporting year 2019 data published on October 13, 2021. We discovered that at least 913 facilities changed or submitted new TRI data during this timeframe, representing approximately 4.2% of all TRI reporting facilities as of October 13, 2021. Other interesting statistics are included below.

376 New facilities submitted TRI data

This suggests these facilities missed the RY2019 deadline of July 1, 2020. The top 5 Industries submitting new TRI data include:

- ▶ Chemical Manufacturing
- ▶ Fabricated Metal Product Manufacturing
- ▶ Transportation Equipment Manufacturing
- ▶ Plastics and Rubber Products Manufacturing
- ▶ Food Manufacturing

252 TRI forms were revised for reported water releases

Approximately 45% of the facilities reported lower water releases than previously reported, while 55% reported more water releases. The top 5 TRI chemicals with revised water release data include:

- ▶ Ammonia
- ▶ Zinc Compounds
- ▶ Lead
- ▶ Lead Compounds
- ▶ Polycyclic Aromatic Compounds

250 TRI forms were revised for reported POTW releases

Approximately 50% of the facilities reported lower POTW releases than previously reported, while 50% reported more POTW releases. The top 5 TRI chemicals with revised POTW release data include:

- ▶ Lead
- ▶ Nitrate Compounds
- ▶ Zinc Compounds
- ▶ Nickel Compounds
- ▶ Hexane

1,264 TRI forms were revised for reported stack emissions

Approximately 51% of the facilities reported lower stack emissions than previously reported, while 49% reported more stack emissions.

1,092 TRI forms were revised for reported fugitive emissions

Approximately 56% of the facilities reported lower fugitive emissions than previously reported, while 44% reported more fugitive emissions. The top 5 most common TRI chemicals with revised fugitive and stack emissions data include:

- ▶ Lead and Lead Compounds (combined Form R)
- ▶ Toluene
- ▶ Ammonia
- ▶ Methanol
- ▶ Xylenes (Mixed Isomers)

373 New chemicals were reported by facilities that had previously reported

This suggests these facilities missed the RY2019 deadline of July 1, 2020 for these chemicals, but met the deadline for other chemicals. The Top 5 most common new chemicals reported include:

- ▶ Phosphorus
- ▶ Nitrate Compounds
- ▶ Zinc Compounds
- ▶ Ammonia
- ▶ Chromium