

January 12, 2006

Office of Environmental Information Docket  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW.  
Washington, DC 20460

Attention: Docket ID No. TRI-2005-0073

On behalf of the American Association for the Advancement of Science (AAAS), which is the world's largest multi-disciplinary science society, I am writing to express our concerns regarding the U.S. Environmental Protection Agency's (EPA) proposed "Toxics Release Inventory (TRI) Burden Reduction Proposed Rule." [Federal Register/Vol. 70, No. 191, pp. 57822-57847]

Under Section 313 (h) of the *Emergency Planning and Community Right to Know Act*, Congress provided for broad distribution of TRI data, specifying that one use is "to assist governmental agencies, researchers, and other persons in the conduct of research and data gathering."

TRI data have been invaluable for researchers in many disciplines, as TRI provides the main (and often only) longitudinal data set on facility emissions. The EPA report *How Are the Toxics Release Inventory Data Used?* states that TRI has become "a powerful tool for many environmental analyses and understanding the many factors that contribute to human health and environmental conditions."

Examples of research conducted with TRI data include risk assessments of facilities and communities, using Geographic Information Systems (GIS) to map trends in toxics and health effects, and conducting social science research on the effect of information disclosure on emissions. TRI data have also been helpful in environmental justice research, as they can be used to correlate information on facilities and population demographics.

The Federal Register notice states, "The principal consequence of finalizing today's action would be to reduce the level of detail available on some toxic chemical releases or management." Initial analyses indicate that approximately 1/3 of facilities will be affected by the rule, changing their reporting of at least one chemical to the less detailed Form A. Of these affected facilities, more than 2,000 could move to using Form A for all their reporting, greatly reducing the available information on these facilities. Furthermore, the proposed rule states that 655 zip codes (7% of all zip codes with TRI reporters) would lose all detailed chemical reporting under the change, providing no comprehensive information on toxics in these communities.

Office of Environmental Information (OEI) Docket  
January 12, 2006  
Page Two

This loss of data would compromise environmental and public health research, eliminating critical data for research in many communities and creating a discontinuous data set for those analyzing long-term trends. We have strong concerns that this would threaten the ability of researchers to identify and understand potential threats to the environment and public health in a scientifically rigorous manner. It also would, in turn, negatively affect both policymakers and the public who depend on this research for their own decisionmaking.

AAAS is the world's largest general scientific society, and publisher of the journal, *Science*. AAAS was founded in 1848, and includes 262 affiliated societies and academies of science, serving 10 million individuals. The non-profit AAAS fulfills its mission to "advance science and serve society" through initiatives in science policy, international programs, science education, and more.

Should EPA staff wish to discuss this matter further, please contact Ms. Kasey White at 202/326 6661. AAAS stands ready to work with you in addressing this important and complex matter.

Sincerely,

Alan I. Leshner