



TRI-2005-0073 -
Pennsylvania Department of Environmental Protection

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January 13, 2006

Environmental Advocate

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Kimberly T. Nelson
Asst. Administrator
Office of Environmental Information
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Attention Docket ID No. TRI-2005-0073

01-25-06 005:01 IN

Dear Ms. Nelson:

Upon reviewing the recently published *EPA Toxics Release Inventory Burden Reduction Proposed Rule*, the Pennsylvania Department of Environmental Protection (PA DEP) Environmental Justice Advisory Board (EJAB) members would like to submit the following comments:

Toxic Release Inventory (TRI) data has been an essential right-to-know tool for alerting emergency responders, researchers, workers, public health officials, environmentalist, community residents, and federal and state officials to the presence of toxic chemicals.

EPA's proposed changes in the TRI would take a valuable resource away from environmental justice communities and communities throughout the Commonwealth, which could have a negative impact on communities who already face being overburdened with pollution.

The EJAB cannot support changing the frequency of reporting to a bi-annual basis; this will have an adverse impact in maintaining the pollution data. EPA's proposed changes create a greater lag in the amount of time until data is available to assist the public with information and government agencies when making policy and regulatory decisions.

By maintaining the current more stringent reporting burdens and reporting thresholds on companies, more companies are required to report TRI data and this simple act of reporting and disclosing releases has prompted corporations to cut toxic pollution by significant amounts. By changing reporting burdens, EPA is reducing incentives to

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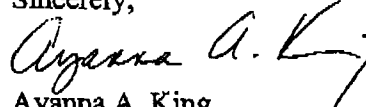


minimize the generation of toxic waste and this will further undermine the ability of public health agencies and researchers to identify important trends.

The EJAB has been working diligently to improve environmental conditions for environmental justice communities in the Commonwealth and the TRI data is a very critical and indispensable tool.

Thank you for granting us the opportunity to comment on EPA Toxics Release Inventory Burden Reduction Proposed Rule.

Sincerely,



Ayanna A. King,
Director