



# Potential Non- Reporters from Cross- Border Transfers

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Toxics Release Inventory Program

# Pollutant Release and Transfer Registers (PRTR) Assessment Project

- FY22 funding to support United States-Mexico-Canada (USMCA) cross-border data analysis of EPA's TRI data:
  - TRI data compared to Canadian PRTR (NPRI) data.
  - TRI data compared to Mexican PRTR (RETC) data.
- Objective: Identify potential Non-Reporters (data quality issues) with TRI reporting based on review of cross-border transfer datasets:
  - Non-reporters: are there facilities which should have reported to TRI but did not?
  - Reporting errors: are there facilities which reported to the TRI Program, but did not do so correctly?
  - Streamlining destination locational information in Canada and Mexico?

# Assessment Objectives

- Goal: Identify cross-border transfers of TRI chemical wastes which should have been reported to EPA's TRI Program but were not.
- Directly supports:
  - Article 24.4 - Enforcement of environmental laws: information will help U.S. EPA to better enforce laws and reporting requirements under EPCRA 313 reporting.
  - Article 24.25 – Environmental cooperation: information from this project will improve communication and exchange of information between the US (TRI) and Canada (NPRI) and Mexico (RETC) leading to improved data and reporting across the PRTRs.

# Assessment Details

- Focused analysis on Import e-Manifest Data.
- Data Source: Hazardous Waste Electronic Manifest for *Imports into U.S.* (Import e-Manifest) System:
  - Generators of hazardous waste in Canada and Mexico denote which facilities in the U.S. received those wastes.
  - Information about shipment date, receiving location, and waste.
- Are there receiving facilities in the e-Manifest system as having received waste containing TRI-listed chemicals and/or certain Federal Waste Codes that would meet the reporting thresholds for TRI *but did not report that chemical to TRI*?
- Milestones:
  - Completed review of reporting data for 2018 to 2022.
  - Currently reviewing 2023 reporting data and streamlining destination locational information. Estimated completion in Fall 2025.

# Assessment – Examples of Potential Errors

- Shipment denotes “RQ, UN3264, WASTE, CORROSIVE, LIQUID, INORGANIC, N.O.S. (NITRIC ACID), 8, II” and a total quantity in 2020 of 117,257 pounds:
  - Receiving facility RCRA Program ID matched to a TRI facility ID which reported other chemicals in 2020 and also reported nitric acid in 2021.
  - Conclusion: Possible reporting error where the TRI facility did not properly report nitric acid in 2020.
- Shipment denotes “RQ WASTE FLAMMABLE LIQUID, NOS 3 UN1993 PG II (CONTAINS TOLUENE, XYLENE) and a total quantity in 2019 of 46,433 pounds:
  - Receiving facility has not reported to TRI before, and Dun & Bradstreet data indicates it has fewer than 10 full-time employees.
  - Conclusion: Facility does not meet TRI reporting requirements.

# Assessment – Preliminary Results

Preliminary results from review of import of e-Manifest data from 2018 to 2022:

- Shipments from Canada to the U.S. - multiple transfers to 29 different facilities.
- Shipments from Mexico to the U.S. - multiple transfers to 11 different facilities.
- Streamlined destination locational information in Canada and Mexico.



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