

December 2006

AGAINST *THE PUBLIC'S WILL*



Summary of Responses to
The Environmental Protection Agency's
Plans to Cut Toxic Reporting

Acknowledgements

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OMB Watch is a nonprofit research and advocacy organization that has government accountability and improving citizen participation as its core mission. Public access to government information has been an important part of our work for more than 15 years, and we have both practical and policy experience with disseminating government information. OMB Watch also actively engages in agency regulatory processes, encouraging agency rules to be sensible and more responsive to public need.

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Methodology

OMB Watch categorized each of the 4,952 unique comments posted in docket EPA-HQ-TRI-2005-0073 on www.regulations.gov (last viewed September 29, 2006) into one of nine stakeholder groups. Each comment, based on reviews of the content, was assigned a standing of "support," "opposition" or "neither" for each of the three proposals.

In calculating the aggregate numbers of the overall position of a comment, the following method was used. If a commenter provided support for one or more of the proposals, then that commenter was categorized as overall "support," even if the commenter opposed one or more of the other proposals. If a commenter was recorded as opposed to one or more of the proposals and there was a complete absence of support for any of the other proposals, then the commenter was categorized as overall "oppose."

In calculating the total number of individual commenters, the number of unique comments reviewed by OMB Watch staff, minus any identified duplicate comments, was added to EPA's calculation of the total number of comments submitted through mass campaigns. Approximately 40 comments in all stakeholder groups were identified as listed twice on www.regulations.gov. In calculating the total number of commenters for the other stakeholder groups, OMB Watch added the total number of unique commenters to any organizations that signed on to multiple-party comments (approximately 400 individuals and groups). Again, duplicates were identified and eliminated from the calculation.

Executive Summary

The Environmental Protection Agency (EPA) received, and continues to receive, overwhelming opposition to a set of recent proposals to modify the Toxics Release Inventory (TRI), the only searchable comprehensive database of toxic chemical information in the United States. The proposals would relax reporting requirements for companies releasing and disposing of certain toxic chemicals in order to reduce the paperwork burden on these companies.

According to OMB Watch's analysis, EPA received comments from 122,420 individuals and groups. The vast majority of these commenters, 122,386 (99.97%), strongly opposed the changes, and only 34 commenters (0.03%) expressed some degree of support for the proposals. The opposition came from over 120,000 average citizens, 23 state governments, more than 60 members of Congress, more than 30 public health organizations, more than 40 labor organizations and more than 200 environmental and public interest organizations. Support for the proposals came almost entirely from companies and industry associations in addition to a handful of government agencies and individuals.

Comments opposing the changes most commonly cited concerns about threats to public health and the environment from increased, unmonitored pollution, the reduced ability of government agencies to make sound decisions on toxic pollution and the lack of burden reduction that will result from the changes. The health concerns raised by public health officials and organizations, the safety concerns raised by local, state and federal governments and the environmental concerns raised by public interest groups bring into question the sensibility of EPA's proposals and strongly suggest that the proposals are too dangerous to implement.

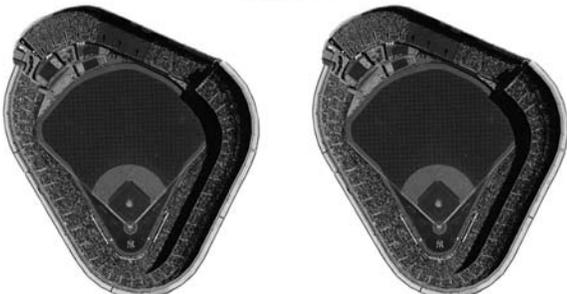
Against the Public's Will: Summary of Responses to the Environmental Protection Agency's Plans to Cut Toxic Reporting offers a detailed analysis of the comments submitted to the EPA's public docket on the proposed changes to TRI. The report identifies nine stakeholder groups, details the level of support or opposition of each group, and summarizes the main points raised by each group.

In addition to the resoundingly negative feedback they received in the docket of public comments, the agency's proposals have faced strong opposition through a number of other channels: the U.S. House of Representatives voted to withhold funding to implement the proposals; the U.S. Senate placed a hold on an EPA nominee in protest of the proposals; the EPA's own Science Advisory Board

wrote the agency in protest; and the Environmental Council of States passed a resolution calling for EPA to withdraw the plans. Despite this mounting resistance, EPA has given every indication that it continues to move forward with significant changes to TRI.

How Many Commented on EPA's TRI Proposals?

Oppose:



Enough to fill two Yankee Stadiums with 7,296 waiting in line

Support:



Enough to fill one small board room

Proposed Changes to TRI

Congress created TRI in 1986 to track the amount and types of toxic chemicals that are released into the environment from, stored at or transferred between U.S. facilities. TRI has been used to alert communities, workers, first responders and public health officials to the presence of dangerous chemicals.¹ The program currently tracks more than 650 chemicals and chemical categories, requiring companies to submit forms detailing how the chemicals are released and disposed.²



Currently under the TRI program, facilities that release and/or dispose of more than 500 pounds of most toxic chemicals tracked by TRI must file a full report (Form R) detailing the exact amount of the chemical and where it went (e.g., air, water, land or recycling). Facilities releasing and disposing of less than 500 pounds can fill out a short certification (Form A) that merely lists the chemical without any quantities or details. Additionally, for 20 highly hazardous chemicals categorized as persistent bioaccumulative toxins (PBT), such as mercury, lead and dioxin, the facilities must file the complete report regardless of the total quantity.

In October of 2005, EPA published a proposed rule that contained two major modifications to the TRI reporting thresholds. EPA proposed to:

- 1) Permit the use of the certification (Form A) for PBTs (other than dioxin) up to 500 pounds as long as there are no releases into the environment.**
- 2) Change the reporting threshold of non-PBTs (Form R) from 500 to 5,000 pounds.**

On the same day, EPA formally notified Congress, as required by law, of its intention to issue a rule changing the frequency of reporting. The agency proposed to:

- 3) Change the reporting frequency from annual to biannual, thereby allowing companies not to report chemical releases and disposals during the off-years.**

EPA invited public comments and feedback on the planned changes. This process, known as a public comment period, is required for all new rules and rule changes. Though EPA only requested comments on the threshold changes (1) and (2), many commenters also remarked on the merits of the alternate year reporting plan (3). The public comment period officially closed on January 15, 2006, but due to the overwhelming level of ongoing comments, EPA continued to accept comments until as late as August of 2006.

Federal rules require EPA to review each of the over 120,000 comments and respond to all of the points and recommendations made by commenters. The process allows agencies to revise proposed rules based on feedback from stakeholders. However, changes are at the discretion of the agency, and EPA is under no requirement to change the proposals in response to comments. EPA announced that it intends to issue a final rule on the threshold changes (1) and (2) by the end of 2006.

TRI Comment Overview

EPA's proposals to change the reporting requirements for the TRI program drew comments from a wide array of stakeholders. OMB Watch divided the commenters into nine stakeholder categories: individuals, government, industry, public interest, public health officials, labor, faith community, investors and researchers.

With more than 120,000 comments, individuals constitute the majority of the comments to EPA's TRI proposals. A large number of mass comment campaigns coordinated by public interest organizations, such as the Union of Concerned Scientists, Breast Cancer Fund, Natural Resources Defense Council, and others, helped generate this tremendous participation by members of the general public. The chart below excludes individuals to provide perspective on the breakdown of commenters besides individuals.

After individuals, public interest organizations made up the second largest stakeholder group with just over 300 groups, many of whom joined in sign-on letters. The third largest category, government agencies and officials, with almost 200 commenters, represent 23 states, more than 60 from the federal government and over 15 from local governments. Interestingly, only 37 comments (0.03% of all commenters and 5% of the non-individual commenters) came from industry, eight of which were non-TRI reporting companies who opposed the changes. Given that EPA proposed the changes to help TRI-reporting companies, it is surprising that more companies and industry associations did not submit comments in support of them.

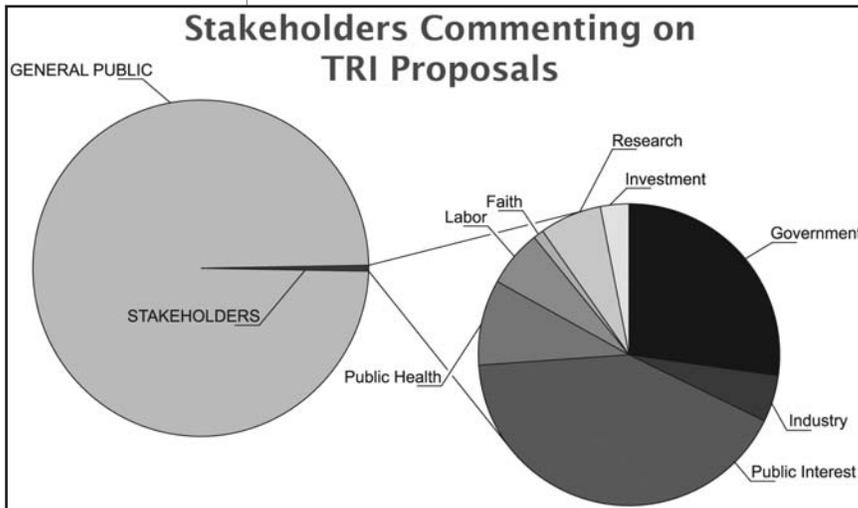
While commenters from the nine stakeholder categories gave a wide variety of reasons for opposing or supporting EPA's proposals, there were some common threads. The main points raised by those opposing the changes, dominated by individuals, government, public health professionals and organizations and public interest groups, were that EPA's proposals would:

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- **Hinder government agencies' and communities' ability to protect the environment and public health and safety.**
- **Damage an environmental program extremely successful at reducing toxic pollution.**
- **Reduce public health professionals' ability to diagnose toxics-related diseases, including environmentally caused cancers.**
- **Offer no burden relief or financial savings for TRI reporting companies.**

The main points raised by those supporting the changes, primarily companies and industry associations as well as a few government agencies, were that EPA's proposals would:

- **Offer burden relief and financial savings for EPA and reporting companies.**
- **Preserve the vast majority (99%) of information on toxic chemicals.**



Breakdown of Stakeholders Commenting on TRI Proposals

	Persons	Government	Industry	Public Interest	Public Health	Labor	Faith	Investment	Research	Totals
Support	2	3	29	0	0	0	0	0	0	34
Oppose	121,691	196	8	302	66	46	8	21	48	122,386
Totals	121,693	199	37	302	66	46	8	21	48	122,420

OMB Watch aggregated the totals for the opposition and support of EPA's proposed changes.³ Opposition to EPA's threshold proposals consisted of submissions from 122,386 commenters (99.97% of total commenters). The 121,691 American citizens who opposed the changes were joined by 196 government agencies and officials, 302 public interest organizations, 66 public health professionals and organizations, 46 labor organizations, eight religious leaders and organizations, 48 researchers and 21 financial investors. Many of these stakeholder groups include great geographic variation with representatives from around the country and include organizations and governments from national, state and local levels. Opposition in most stakeholder groups was unanimous, with only three stakeholders—companies and industry associations, individuals, and government—containing commenters that supported the proposals.

There were 34 commenters who supported either of EPA's threshold proposals (0.03% of total commenters). The support came from a narrow group comprised of seven companies and 22 industry associations, three government agencies and two individuals. Of the three government agencies offering support for the TRI changes, two offered criticisms of the proposals, including one which limited its support to only one out of the three proposed changes. No stakeholder category, including industry, offered unanimous support of the TRI changes. Though when non-TRI reporting companies are excluded from the industry stakeholder category, the remaining companies and industry associations are unanimous. However, the lack of support from the thousands of TRI-reporting companies that could have commented raises serious questions about the merits of EPA's burden reduction proposals.

EPA's Response to the Opposition

Outside of the public comment process, EPA has received additional strong criticism and resistance to the proposed changes to TRI reporting. In the months following the close of the public docket:

- ***The House of Representatives passed a resolution preventing the EPA from implementing the rule changes.***
- ***Sens. Lautenberg (D-NJ) and Menendez (D-NJ) placed a hold on a Bush administration nominee to protest the proposals.***
- ***EPA's Science Advisory Board formally, in a letter offering the agency unsolicited advice, opposed the proposals.***
- ***The Environmental Council of States passed a resolution urging EPA to withdraw the proposals.***

Each of these occurrences represents an opportunity for EPA to issue a statement or give some signal that the agency does not intend to move forward with significant changes to TRI. However, EPA has not given Congress, state environmental officials, its advisory board or the general public any indication that the agency does not expect to significantly rollback reporting requirements to TRI. There is every indication that EPA will move forward with significant changes to TRI despite the opposition.

Stakeholders & How They Use TRI

Individuals, average American citizens, investigate companies in their communities.

Government agencies and officials track toxics at the local, state and federal levels.

Industry associations and companies fill out TRI forms.

Public interest organizations identify pollution problems and advocate for solutions.

Public health professionals and organizations locate connections between toxics and health problems.

Labor organizations protect the safety of America's workers.

Faith-based organizations and religious leaders advocate for acting with moral responsibility.

Investors shape their portfolios and assess corporate performance.

Researchers investigate harms to the environment and health.

Individuals

More than 120,000 individuals—average American citizens not representing any organization or government—sent EPA comments opposing the agency’s proposals. Individuals expressed concerns that EPA’s proposals would inhibit their ability to make informed choices about where they live, the companies they work for and buy from and where their children go to school. Most individuals submitted their comments through one of 38 action alert campaigns sponsored by various public interest groups, including the Union of Concerned Scientists, Working Assets, Natural Resources Defense Council and Environmental Defense.



Opposing Points

Comments from the general public stated that TRI gives them the power to make decisions to avoid potentially life-threatening situations. Katie Melies, who lived near a hazardous waste site in Missouri where she witnessed the deteriorating health of her neighbors, told EPA, “with the current safeguards, at least we can choose to stay or move.”⁴ Many comments also stressed that the reduced data from the changes would hinder

their ability to make many other choices effectively, such as where their kids go to school, what products they use, and whether or not to buy houses.

“Since these changes will reduce my ability to be informed about who is releasing known toxics

“These changes will reduce my ability to be informed about who is releasing known toxics into the environment where I live . . .”

- Kenneth Bergee, Minneapolis, MN

into the environment where I live, and thus will prevent me from being able to defend myself, I

ask that I be informed about what your reasons are,” states Kenneth Bergee of Minneapolis, MN.⁵

Many public comments characterized EPA’s plans as placing industry interests ahead of public health. Kristin Eggleston of Clarkston, WA accused EPA of being, “hijacked by wealthy special interests to the detriment of the whole American population.” Like thousands of other Americans, she told EPA not to “relax the reporting requirements of the TRI or you are complicit in the environmental and health atrocities that affect our nation!”⁶ People repeatedly argued that allowing companies to hide pollution information from the public unjustifiably prioritizes corporate interests over the public interest.

Public comments also noted the success that TRI has achieved in improving environmental practices of businesses and in compelling companies to reduce toxic emissions by billions of pounds. People worried that the propos-



als would cripple the TRI program and that reduced public pressure and oversight would allow companies to reverse course and increase pollution. "The TRI program has been a great success, helping to cut releases of toxic chemicals in the U.S. by 2.8 billion pounds from 1998 to 2003," stated Edith Chase of Kent, OH. "The current USEPA proposal ... will provide much less information to base investment decisions that would reduce pollution."⁷ Many people expressed dismay and disappointment that plans to reduce toxic reporting appear to contradict EPA's primary mission as a federal agency to protect public health and the environment.

Supporting Points

Only two comments among the 121,693 comments from individuals contained points that somewhat supported EPA's plans. One agreed that the proposals would reduce reporting burden on companies, and another stated that only a very small percentage of the public actually uses TRI data.

Christopher J. DeCree, an environmental engineer for Lockheed Martin, argued that alternate year reporting and higher reporting thresholds for lead would reduce burden. However, DeCree did not expressly support these options and even noted that raising reporting thresholds for non-PBTs would "countermand that overall mandate" of the TRI program to "protect the public from harmful releases to the environment."⁸



Comment Breakdown

Total Number: 121,693

Mass Campaigns: 117,137

Unique Comments: 4,556

Positions

5,000 lbs. Threshold

Oppose: 121,681

Support: 1

Neither: 11

500 lbs. Threshold

Oppose: 121,680

Support: 2

Neither: 11

Alternate Year:

Oppose: 121,668

Support: 1

Neither: 24

Main Points

Opposition:

- Less information to make personal decisions
- Serves industry at the expense of public health
- Fails to protect the environment

Support:

- Reducing burden for EPA and companies
- Most people do not use TRI

Mark Atlas of Gaithersburg, MD cited a 1998 analysis by EPA showing little public knowledge and use of the TRI database. Making no statements in support or opposition to the proposals, Atlas urged EPA to consider the results of this analysis.⁹

Government

Government agencies and officials use TRI data to track toxic chemicals and their impact at the federal, state and local levels. State and local agencies use toxics data to conduct risk analysis, target enforcement actions and prioritize agency activities in order to protect the health and safety of at-risk populations. Given that some states will lose more than 50 percent of their toxics data if EPA's plans are implemented, it is not surprising that 113 state agencies and officials (representing 23 states) and 17 local government officials and agencies submitted comments, all of them opposing EPA's proposals, either in part or in their entirety. At the federal level, 67 of the 69 federal comments, representing over 60 members of Congress, were submitted in opposition to the changes.



Opposing Points

Many state agencies and officials commented that EPA's proposed changes will severely impede their ability to monitor toxic chemicals and effectively reduce threats of public exposure. The Oklahoma Department of Environmental Quality, for example, argues that if the changes go into effect, they "would no longer be able to track potential hot spots without the amount and location of PBTs released in Oklahoma."¹⁰ State governments also argued that the health impacts of the proposed changes would be severe. The Ohio Environmental Protection Agency, for instance, recommended that EPA study the potential health impacts of the reduced reporting and oversight before moving forward with the changes.

Repeatedly, state governments argued that EPA's changes would impair their ability to protect the public. The Pennsylvania Department of Environmental Protection, for instance, argues that, "the proposed rulemaking would not ensure that the state and local agencies and the general public would have access to vital information needed for the assessment of exposure to air toxics."¹¹



Federal officials echoed the states' concerns, arguing that EPA's proposals would damage a useful and successful tool. All five congressional representatives from Connecticut argued that, "changing the rules would increase pollution as well as severely limit the public's right to know."¹² Quoting EPA, six Senators wrote that, "EPA acknowledges that TRI is 'a powerful tool for many environmental analyses and understanding the many factors that contribute to human health and environmental conditions.'"¹³ This sentiment echoes the disbelief expressed by the general public that EPA would propose reporting rollbacks that would threaten the effectiveness of such a successful environmental program.

Several state comments also complained that EPA's changes would have unexpected impacts on state revenue since many state programs collect fees based on the toxic reporting and use the

money to fund pollution control efforts. EPA's proposed changes would financially cripple these state programs. The Minnesota Pollution Control Agency wrote that the reporting changes would

Comment Breakdown

Total Number: 199

Federal: 69

State: 113

Local: 17

Positions

5,000 lbs. Threshold

Oppose: 197

Support: 2

500 lbs. Threshold

Oppose: 196

Support: 3

Alternate Year

Oppose: 195

Support: 0

Neither: 4

Main Points

Opposition:

- Governments less able to protect health and environment
- Reduces state agency revenue
- No burden reduction

Support:

- Burden relief and financial savings
- Minimal loss of information

result "in a significant reduction in revenue available for pollution prevention technical assistance programs. Other states with similar funding mechanisms for pollution prevention technical assistance that will be affected by this proposal include Colorado, Maine, Massachusetts and Mississippi."¹⁴

Government comments also objected that the proposals would result in little to no benefits for reporting companies. For instance, the South Carolina Department of Health and Environmental Control maintained that it "would support changes to the Toxics Release Inventory's (TRI) requirements that would eliminate truly unnecessary reporting." However, the agency opposed the EPA's proposed rule because it did not satisfy this standard.¹⁵ This criticism was also made at the federal level by the Department of Energy (DOE), among others, which noted, "The only actual burden reduction realized is the time to fill out the Form R versus Form A, which is minimal."¹⁶

Supporting Points

The limited support from government commenters centered around two primary points: that there would be meaningful burden reduction and that there would not be a significant loss of information. The Small Business Administration (SBA), the most supportive government commenter, stated that businesses would benefit greatly from the proposed changes,

saving up to \$7 million annually, and that the loss of information would be minimal and ultimately insignificant.

After criticizing the lack of significant burden reduction, DOE, in the end, supported the threshold changes apparently because the agency believes the impact on the data would also be minor. The Ohio EPA, the only state commenter to support any of the three proposals, objected to the threshold change for non-PBTs to 5,000 pounds but supported the PBT threshold change, because "the facilities will continue to report that they are using the chemical."¹⁷ SBA supported both threshold changes for a similar reason and wrote that, "EPA's reform proposal will still require detailed data for the reports that account for 99.9% of the production-related waste data."¹⁸

Industry

Companies in industries such as chemical manufacturing, electronics and waste management fill out TRI forms. The TRI-reporting companies and the related industry associations that commented to EPA were very supportive of the proposed changes. They argued that the rule changes would reduce reporting burden and offer financial savings without harming the TRI program. All 22 industry associations and seven TRI-reporting companies supported EPA's burden reduction proposals, though to varying degrees. Eight smaller non-TRI-reporting companies submitted comments opposing EPA's proposals.



Opposing Points

Strong opposition to EPA's proposed changes to TRI was voiced by eight non-TRI-reporting food merchants and small businesses. These businesses cited health and environmental concerns to support their positions. Spectrum Organic Products of San Francisco, CA, for instance, wrote that the proposal does "not in any way support the public interest or protect public health but instead simply makes it easier for polluters to pollute more."¹⁹

While all of the TRI-reporting companies and industry associations supported the proposed threshold changes, many complained that proposals would not significantly reduce reporting burden. For instance, the American Petroleum Institute argued that the changes "would not provide a significant burden reduction."²⁰ The National Mining Association also stated that they were "disappointed in the apparent lack of substance in the burden reduction proposals."²¹

Almost all of the comments recommended different proposals to reduce the TRI reporting burden, indicating that proposals may not be adequate from an industry perspective. Many companies suggested that the Form A thresholds for reporting PBTs and non-PBTs need to be drastically increased for there to be any real burden relief. For instance, SC Johnson and Son Inc. made a similar request that the million-pound manufacturing threshold be removed for using Form A. If this change were made, they argued, "the amount of relief could be further increased ...

"The use of alternate year reporting . . . would have a significant effect on reporting burden, without having a significant effect on information desired by the public."

- The National Petrochemical & Refiners Association

without harming the quality of the data that the Agency receives.”²²

Supporting Points

Several TRI-reporting companies argued that the proposed changes would successfully reduce reporting burden without significant data loss. Some companies, like Waste Management (WM), stated that they support the changes because others may benefit even though they reap no savings from the changes. “While WM does not anticipate taking advantage of the revisions, we believe that many of our customers will.”²³ This position appears to be indicative of a more general belief that any proposals to reduce TRI reporting are a positive development, because any sort of regulatory burden relief is good even if it fails to benefit one company in particular.

Almost all of the TRI-reporting industry commenters that mention the proposal for alternate year reporting, namely five companies and 11 industry associations, were supportive because of expected reporting burden relief. GE, who “strongly supports” alternate year reporting, stated that “alternate year reporting would allow for more time and energy to be spent on data QA/QC, analysis, and information presentation.”²⁴ The National Petrochemical & Refiners Association, for instance, stated, “The use of alternate year reporting ... would have a significant effect on reporting burden, without having a significant effect on information desired by the public.”²⁵

All of the non-TRI-reporting companies were opposed to alternate year reporting. One industry association explicitly opposed the alternate year proposal. The American Public Power Association stated that it is, “not recommending a move to two-year reporting cycles for entities covered by EPCRA because it would diminish the usefulness of the program.”²⁶

Comment Breakdown

Total Number: 37

TRI-reporting companies: 7
Non-TRI-reporting companies: 8
Industry Associations: 22

Positions

5,000 lbs. Threshold

Oppose: 8
Support: 29

500 lbs. Threshold

Oppose: 8
Support: 29

Alternate Year

Oppose: 9
Support: 16
Neither: 12

Main Points

Oppose:

- Harms public health and environment
- Limited burden reduction
- Need for further burden reduction

Support:

- Support for regulatory relief
- Alternative year reporting offers burden relief

Public Interest

Public interest and environmental organizations routinely rely on the TRI to identify toxic pollution problems, advocate for public policy solutions and negotiate directly with industry to compel proper enforcement of existing regulations.²⁷ All of the 302 public interest and environmental organizations that commented to EPA opposed the agency's proposals. Approximately 200 public interest organizations signed on to comments opposing the changes. National, state and local public interest groups said that EPA's proposals to weaken the TRI would hinder their ability to protect the environment and the public and to promote effective business practices.



Opposing Points

Public interest groups were concerned that EPA's proposals would make it more difficult for them to help protect public health and the environments of the communities they serve. Marian Feinberg works with For A Better Bronx and opposed the proposals for fear that less data will hinder her group's ability to help stem the country's growing asthma epidemic. "We are finding a very high rate of correlation between asthma hospitalizations and TRI facilities." There is widespread concern among the public interest commenters that the EPA's proposals will harm research which is vital for the protection of public health.²⁸

"EPA considers as a justification that only a small amount of information is lost. If it comes from that neighborhood facility where you live, it is the most important toxic information that is being lost."

- Suzanne Seppi, Group Against Smog & Pollution



Groups also pointed out how EPA's proposals would eliminate all reporting of certain ultra-hazardous chemicals in many areas across the country. In Maine, "one hundred percent of the data on arsenic compounds waste would no longer be collected -- information that could be critical to meeting arsenic drinking water standards."²⁹ Groups noted that in another state, Minnesota, "One hundred percent of the data on di-(2-ethylhexyl) phthalate, a recognized carcinogen and developmental

neurotoxin, as well as an endocrine disruptor, would no longer be collected."³⁰ In all, the National Environmental Trust found that 922 communities (more than 10 percent of the communities with TRI facilities) could lose all numerical data from TRI-reporting facilities if EPA implements the proposed threshold changes.³¹



Environmental justice campaigns, which rely on TRI data to identify sources of emissions, argued that downsizing the TRI will take away one of the few tools they have for holding industries accountable.³² Steve Brittle of Don't Waste Arizona, which is working on a project to track emission reductions, concluded EPA's proposals would "undermine and destroy this effort, invalidating hundreds of thousands of dollars of granted monies."³³

Public interest groups rejected EPA's claim that the proposals are harmless because only a small percentage of national aggregate of TRI data will disappear. Instead, organizations asserted that

Comment Breakdown

Total Number: 302

Positions

5,000 lbs. Threshold

Oppose: 302

Support: 0

500 lbs. Threshold:

Oppose: 302

Support: 0

Alternate Year

Oppose: 300

Support: 0

Neither: 2

Main Points

Opposition:

- Communities less able to protect health and environment
- Eliminates all information on some toxics
- Impedes environmental justice campaigns
- All local toxics information is important

local toxics data is highly valuable and needs to be preserved. Even though 99 percent of the total national data will be maintained, significant fluctuations occur at local levels that will not be monitored if the EPA changes go through.

Groups also repeatedly noted that many of the chemicals tracked under the TRI are so extremely toxic, even in small quantities, that what may seem like a minor emission at the national level is a major health concern at the local level. Suzanne Seppi from Group Against Smog & Pollution from Pennsylvania stated, "EPA considers as a justification that only a small amount of information is lost. If it comes from that neighborhood facility where you live, it is the most important toxic information that is being lost."³⁴

Public Health Officials

Research exploring the links between disease and environmental toxics is a burgeoning field, and TRI data is essential information for exploring such connections. The health concerns associated with EPA's proposals compelled 33 public health organizations as well as 33 public health professionals including medical doctors, registered nurses and masters of public health to formally oppose EPA's proposals. The health community's comments express both frustration and bewilderment that an agency would propose to reduce toxics information that has proven vital in medical research and diagnosis of disease.



Opposing Points

Many public health organizations and individuals made the case that EPA's proposals would have a negative impact on children's health and criticized EPA for not conducting any analysis to demon-

strate otherwise. Children, because of their ongoing development, are particularly susceptible to toxic chemicals, even in low quantities that would not pose a serious health risk to adults. Pediatrician Carolyn Akinbami from Seattle Washington commented to EPA that its proposals would "make it very difficult or impossible to monitor or prevent the known toxic effects of a number of known cancer causing agents, as well as substances known to damage children's rapidly developing nervous system."³⁵ The American Public Health Association and the Children's Environmental Health Network, in joint comments, criticized EPA for not conducting "a review of the impact of these actions on children's environmental health," and called this lack of analysis "a serious omission, given children's unique vulnerabilities and exposures."³⁶

Public health commenters also expressed concern that the TRI proposals will hinder their ability to diagnose and treat toxic-related diseases and conditions. Many medical professionals have observed increases in diseases such as asthma and endocrine-related cancers, as well as severe allergies, especially in younger patients. Physician Stephanie McCarter-Haag of Point, TX stated that, "the increase in toxics released into our environment is responsible [for the increase in diseases]." Health professionals repeatedly stressed that they want more, not less, data on toxics, because, as Dr. McCarter-Haag noted, "The concentration of pollutants in different areas of the country is directly correlated to these higher numbers of disease."³⁷

Several public health comments also objected to EPA's proposals, because the changes would encumber research into public health issues. Bonnie New, a physician in Houston, TX, asserted that EPA's proposals would eliminate her ability to "track toxics emissions that are highly relevant to health."³⁸ Chemist, research biologist and physician D. Radfor Shanklin of Memphis, TN uses TRI in research and made an appeal to EPA for more, not less, information on toxics in his comments. "The extent and detail of reporting should be INCREASED not decreased. To do otherwise is to become complicit with the well documented historic tendency of

much of big industry to falsify their science, mislead the public, and turn cold shoulders to the harm to environment and health."³⁹

Comment Breakdown

Total Number: 66

Health Organizations: 33

Health Professionals: 33

Positions

5,000 lbs. Threshold

Oppose: 66

Support: 0

500 lbs. Threshold:

Oppose: 66

Support: 0

Alternate Year

Oppose: 65

Support: 0

Neither: 1

Main Points

Opposition:

- Negative impact on children's health
- Hinders professional diagnosis of disease
- Need for more not less toxics information
- Encumbers public health research and tracking

Labor

Labor organizations, which were among the first groups calling for greater information on toxic chemicals used at and released from industrial facilities, have long used TRI information to protect the health and safety of America's workers. TRI data is often used to advocate for safer business practices at large manufacturing companies and alert workers to the health risks in their work environments.



Across the board, the 46 unions and labor organizations that commented on the proposals opposed them. Chief among the respondents were the AFL-CIO—the largest labor coalition in America, comprising 62 unions and 13 million workers—along with the United Steelworkers (USW), representing 1.2 million working and retired members throughout the United States and Canada. The labor commenters objected to the EPA's plans because they felt the changes would rollback progress made in environmental and public health protections and place workers and communities at greater risk of exposure to toxic chemicals.

Opposing Points

Labor unions' concern for the safety of the workers at facilities nationwide that handle dangerous TRI materials compelled them to oppose EPA's proposal. The changes, they argued, would limit the ability of workers to protect themselves against hazards on the job. The AFL-CIO, California Labor Federation, Communication Workers of America and USW stated, "Any efforts that reduce the quality and quantity of the data available from the TRI program, such as that proposed here by EPA, will reduce the ability and effectiveness of workers to assess and improve the conditions at their workplaces."⁴⁰ Government rules that help protect workers' health and safety, including the TRI program, represent hard-fought victories for labor groups, who, based on their comments, are unwilling to give them up.

Labor groups voiced equal unease that communities would also face greater risk of exposure to hazardous material under EPA's plans. Often workers at TRI facilities live in communities near these facilities, placing themselves and their families at risk of exposure. The New Hampshire Coalition for Occupational Safety stated that, "EPA is proposing to weaken [workers'] ability to learn how the same substances endanger them and their families when released in the community."⁴¹

Being familiar with operations of businesses and industrial facilities, labor organizations also complain that EPA's proposals will sacrifice a successful environmental program without benefiting reporting companies in any significant way. The New York State Public Employees Federation, AFL-CIO Division 169, stated, "A reduction in the data release information will likely result in greater uncertainty and inaccuracy in characterizations of chemical releases (e.g. through inaccurate assumptions). Ironically, this could actually increase burdens on facilities that choose to correct such misinformation."⁴² Given the EPA's stated reason for the proposed changes to TRI reporting is to reduce burden on companies, worker groups view the lack of real benefits in this area as an obvious reason to withdraw the proposals.

Comment Breakdown

Total Number: 46

Positions

5,000 lbs. Threshold

Oppose: 46

Support: 0

500 lbs. Threshold:

Oppose: 46

Support: 0

Alternate Year

Oppose: 44

Support: 0

Neither: 2

Main Points

Opposition:

- Harms worker protections
- Communities less able to protect health and environment
- No burden reduction

Faith Community

Religious leaders and faith-based organizations asserted that we have been given stewardship of the earth and that this responsibility creates a moral imperative for sound and informed environmental and health decisions. All of the faith-based commenters opposed EPA's planned changes from a moral standpoint. In order to act responsibly and morally, companies and individuals need accurate information about the toxic chemicals released into their neighborhoods. Therefore, the faith-based commenters argued, we need more information about toxic chemicals, not less.



Opposing Points

Caring for and protecting the earth is an individual moral responsibility, and the EPA's proposals abandon that responsibility, faith-based stakeholders maintain. Pastor Mary Hutchison Johns' moral and ethical codes compelled her to oppose EPA's proposals. "I feel keenly our responsibility to be good stewards of creation and its resources. The right to know about toxic pollution industries allows us to hold people accountable and to protect the vulnerable."⁴³

Comment Breakdown

Total Number: 8

Individuals: 2

Organizations: 6

Positions

5,000 lbs. Threshold

Oppose: 8

Support: 0

500 lbs. Threshold:

Oppose: 8

Support: 0

Alternate Year

Oppose: 8

Support: 0

Main Points

Opposition:

- Violates moral principles of stewardship
- Communities less able to protect health and environment
- Expand program rather than reduce
- Limits responsible investment practices

Religious commenters noted how municipalities across the country utilize local toxics reporting on a regular basis to evaluate community-wide risks, plan their safety and first-response procedures and keep their citizens informed of any potential hazards. Faith-based organizations often work closely with disempowered vulnerable communities throughout the country. Sister Mary Gebhard of Wisconsin underscored how crucial such information can be to community leaders. "Our right-to-know about pollution and waste should not be sacrificed," Sister Gebhard stated. "We have all seen the compelling images of toxic pollution left behind on sidewalks and in homes from the aftermath of Hurricane Katrina."⁴⁴

Many of the comments stressed the enormous benefits and leverage the TRI program has provided for communities and environmental action groups when dealing with irresponsible companies. They claim that the program's considerable successes indicate that EPA's planned changes are a move in the wrong direction. Faith-based commenters urged that reporting should be more comprehensive, not less, and that thresholds should be lower, not higher. For instance, Mary Brigid Clingman of the Dominican Sisters, Grand Rapids, MI stated, "we are perplexed with EPA's proposal to curtail its 'Right-to-Know' commitment that has proven to be so successful and we would encourage instead that EPA expand coverage of dangerous pollutants."⁴⁵

Four large faith-based organizations also mentioned the importance of determining a company's environmental record in making investments.⁴⁶ Similar to social investment companies, these groups complained that the reduction in TRI information would make it more difficult to make investment decisions that promote the moral values outlined in their comments. The Benedictine Sisters of Beorne, TX explained, "Access to reliable quantitative environmental performance data is critical to our investment decision-making."⁴⁷ They also stressed that there exists no easily obtainable alternative to the TRI reporting that would provide reliable data on companies' performances as environmental stewards.

Investors

Socially responsible investment firms across the country use TRI data to shape their portfolios, educate their investors and encourage companies to decrease their environmental impact. Many socially responsible investing firms rely on TRI data to make investment decisions based on environmental impacts of specific companies in order to advise their clients. All 21 of the socially responsible investing firms that submitted comments were strongly opposed to raising the reporting threshold and implementing an alternate year reporting scheme.

Opposing Points

Investors stressed the importance of TRI data in influencing investment decisions. The president of the social investment firm Ceres Mindy Lubber wrote, "investors, and not just those commonly referred to as 'socially responsible,' are becoming increasingly concerned about a host of environmental issues, persistent toxins and climate change among them." For many investors, the main concern is "the issue of transparency," and EPA's changes severely impair efforts to improve transparency.⁴⁸ Any reduction in TRI information would greatly affect the ability of a financial advisor to direct her client's portfolio towards environmentally sound facilities. Some groups specified that they use the TRI data to track the top ten facilities with the most emissions in each state and the top 35 nationally. This data is compared to clients' current portfolios and used to plan for future investment.

Several investment groups stressed the necessity for timely data in making sound investment and business decisions. They argued that EPA's changes, specifically the alternate year proposal, would severely reduce the utility of pollution data, making it essentially useless in implementing timely investment decisions. The commenters specifically refuted the benefits of EPA's proposal to switch to alternate year reporting. Jim Horlacher of the First Affirmative Financial Network noted, "moving to a biennial reporting requirement would make it more difficult to track corporate performance year-by-year and would delay our chances to raise questions or concerns with companies in a timely fashion."⁴⁹

Investment groups stated that good management practices are, in part, gauged by environmental performance. Julie Fox Gorte, the Chief Social Investment Strategist of Calvert Group Ltd., stated that, "many investors have learned that the quality of corporate management and governance cannot be judged solely by examining balance sheets and income statements, and that management of environmental and social assets and liabilities gives crucial clues to the quality of executive leadership."⁵⁰ Financial statements alone cannot provide enough information for investors to assess a company's performance, and TRI is one piece of supplement that speaks to overall performance, according to comments.

Several commenters also noted that TRI data has often been the basis for productive dialogues between companies and investors that often lead to improved environmental policies and practices. Heidi Soumerai, the Director of Social Research at Walden Asset Management, a division of Boston Trust, explains that the loss of such information would reduce opportunities "to engage collaboratively with companies on avenues to improve their environmental performance."⁵¹



Comment Breakdown

Total Number: 21

Positions

5,000 lbs. Threshold

Oppose: 21

Support: 0

500 lbs. Threshold:

Oppose: 21

Support: 0

Alternate Year

Oppose: 21

Support: 0

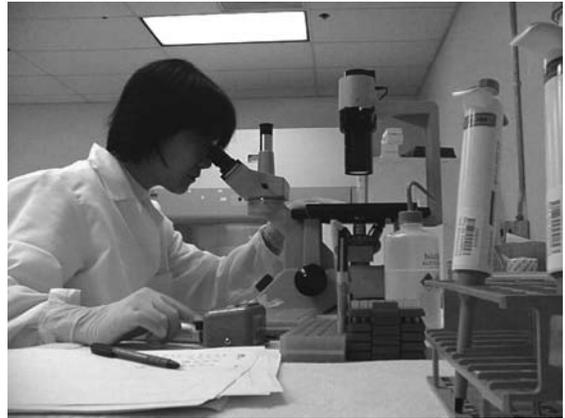
Main Points

Opposition:

- Poorer decisions by investors and companies
- Hinders assessments of corporate performance
- Reduces dialogue on environmental improvements

Researchers

Researchers use TRI for accurate, up-to-date information to establish realistic models and reach statistically significant conclusions regarding the harm toxic pollution causes to the environment and public health. EPA received 48 comments from researchers at universities and laboratories across the country opposing the EPA's proposed changes to TRI. Researchers worry that EPA's plans to decrease access to toxic information will harm the work of scientists, communities, businesses and governments.



Opposing Points

Researchers, needing accurate information for effective analysis, repeatedly stressed their concerns that less reliable and specific data on toxics would limit the use of the data for any analysis by academics, government agencies, or even companies. For instance, Lenora Smith, a researcher studying the effects of chemicals on community health, concludes that if the EPA implements its proposals, "the information available to the public will incrementally be older and less accurate."⁵² Researchers believe that drawing conclusions from, or advising decision-makers with, partial, untimely and inaccurate data would be inefficient, counterproductive, and in some cases, physically or economically dangerous. It is in this vital capacity that researchers have found the TRI program, as it is currently configured, to be successful beyond all expectations.

The research community views the proposed rule changes as bad for businesses and consumers. Without access to accurate, timely research data, it would be difficult for businesses to stay competitive in their fields, and business practices will likely suffer efficiency problems. Moreover, researchers argue that the changes will harm government decision-making, because they will have less accurate information to formulate policy.

Professor Andrew King of Tuck School of Business at Dartmouth College sums this up, stating, "Changing the rules will make policy making much more unpredictable. It will mean that both business managers and policy makers will be flying blind. In the end, I believe, the new rules will end up costing both business and government more money."⁵³

"Changing the rules will make policy making much more unpredictable. It will mean that both business managers and policy makers will be flying blind."

- Professor Andrew King, Tuck School of Business, Dartmouth College

TRI data provides an opportunity for American citizens and their advocates to evaluate firms and companies using independently compiled data. Professor Lori S. Benneer of Duke University and Professor Michael Greenstone of MIT argue that the proposals “would undermine families’ abilities to assess the risks that they face from living near facilities that release toxic chemicals.” Knowledge of what chemicals are in or near a community enables citizens and civic leaders to engage industry and improve environmental conditions. Researchers expressed concern that the lack of such information may lead to less citizen action and pressure to reduce toxic pollution. Kimberley Frederick, Ph.D., a chemistry professor at College of the Holy Cross, worries that “[living] in a city which is almost entirely polluted with industrial waste, I am concerned that this change in reporting will only lead to greater complacency from the already tired public.”⁵⁴



Researchers expressed concerns about the broad, nationwide impact of EPA’s proposals on the public’s trust. Working with “local industry, including the chemical industry, on pollution reduction and pollution remediation,” Professor of Chemistry Joseph A. Gardella, Jr. of SUNY Buffalo writes that TRI data is absolutely necessary for “building trust and collaboration between companies and communities that are exposed to releases.”⁵⁵

Comment Breakdown

Total Number: 48

Positions

5,000 lbs. Threshold

Oppose: 48

Support: 0

500 lbs. Threshold

Oppose: 48

Support: 0

Alternate Year

Oppose: 48

Support: 0

Main Points

Opposition:

- Creates inaccurate, out-of-date information for research
- Poorer government, company and individual decisions
- Decreases transparency and public trust

Many researcher comments noted that the proposal could be perceived as a shift in the EPA’s and the federal government’s priorities with respect to protecting the environment. Kenneth Geiser and Joel Tickner of the Lowell Center for Sustainable Production at the University of Massachusetts speculate, “These changes would not only undermine the efficacy of what is arguably one of the most efficient pieces of environmental policy ever, it will also undermine public trust in government and industry, representing a giant step backwards away from the national goal of pollution prevention.”⁵⁶

NOTES

1. The Environmental Protection and Community Right to Know Act 42 U.S.C. 11001 (1986) created TRI.
2. Chemical facilities must report to TRI if they are within a specific industry, have over 10 full-time employees and manufacture or process one or more of 667 chemicals over a certain threshold.
3. The support includes all commenters who displayed support for any of the three proposals (even if they opposed one or more of the three proposals). The opposition includes all commenters who displayed opposition to one or more of the three proposals and did not support any of the three proposals.
4. Katie Melies. EPA-HQ-TRI-2005-0073-4799, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
5. Kenneth C. Bergee. EPA-HQ-TRI-2005-0073-4380, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
6. Kristin Eggleston. EPA-HQ-TRI-2005-0073-0723, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
7. Edith Chase. EPA-HQ-TRI-2005-0073-0073, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
8. Christopher J De Cree. EPA-HQ-TRI-2005-0073-1276, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
9. Mark Atlas. EPA-HQ-TRI-2005-0073-2158, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
10. Oklahoma Department of Environmental Quality. TRI-2005-0073-0706, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
11. Kathleen A. McGinty, Secretary, Pennsylvania Department of Environmental Protection (Dep). EPA-HQ-TRI-2005-0073-2558, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
12. Rep. Nancy L. Johnson, United States Congress, Rep. Christopher Shays, United States Congress, Rep. Rosa DeLauro, United States Congress, et al. (5 Reps. total). TRI-2005-0073-4537, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
13. Senator James Jeffords, Senator Barbara Boxer, Senator Ron Wyden, Senator Hillary Rodham Clinton, Senator Barack Obama, and Senator John McCain, United States Senate. TRI-2005-0073-1283, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
14. Sheryl A. Corrigan, Commissioner, Minnesota Pollution Control Agency. TRI-2005-0073-4639, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
15. Myra C. Reece, Chief, Bureau of Air Quality, SC Department of Health & Environmental Control. TRI-2005-0073-2365, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
16. Thomas Traceski, Director, Office of Pollution Prevention and Resources Conservation, U.S. Department of Energy. TRI-2005-0073-0899, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
17. Joseph Koncelik, Director, Ohio Environmental Protection Agency. TRI-2005-0073-2488, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
18. Thomas M. Sullivan, Chief Counsel for Advocacy and Kevin L. Bromberg, Assistant Chief Counsel for Environmental Law, Office of Advocacy, U.S. Small Business Administration. EPA-HQ-TRI-2005-0073-2018, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
19. Denise Shermer, Western Regional Sales Manager, Spectrum Organic Products. EPA-HQ-TRI-2005-0073-4627, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
20. American Petroleum Institute (API). EPA-HQ-TRI-2005-0073-1961, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
21. National Mining Association (NMA). EPA-HQ-TRI-2005-0073-2541, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
22. SC Johnson & Son, Inc. (SC Johnson). EPA-HQ-TRI-2005-0073-2157, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
23. Waste Management Inc. (WM). EPA-HQ-TRI-2005-0073-1048, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
24. GE Corporate Environmental Programs. EPA-HQ-TRI-2005-0073-2163, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
25. National Petrochemical and Refiners Association (NPRA). EPA-HQ-TRI-2005-0073-1156, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
26. American Public Power Association (APPA). EPA-HQ-TRI-2005-0073-4141, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
27. Though they could have been categorized as public interest organizations, comments from public health and faith-based organizations are separately considered in their respective sections of the report.
28. Marian Feinberg, For A Better Bronx. EPA-HQ-TRI-2005-0073-775. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
29. Susan Shell, Nation Environmental Trust Maine. EPA-HQ-TRI-2005-0073-1204, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
30. Jacek Pruski, National Environmental Trust Minnesota. EPA-HQ-TRI-2005-0073-1243, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.

31. Tom Natan, National Environmental Trust. EPA-HQ-TRI-2005-0073-3810. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
32. Some of the environmental justice organizations that commented include: Sierra Club's National Environmental Justice Grassroots Organizing Program. EPA-HQ-TRI-2005-0073-2097, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006; Fort Ord Environmental Justice Network. EPA-HQ-TRI-2005-0073-2133, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006; Environmental Justice Consultants from Pennsylvania. EPA-HQ-TRI-2005-0073-2079, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006; and Environmental Community Organization from Ohio. EPA-HQ-TRI-2005-0073-1999, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
33. Don't Waste Arizona. EPA-HQ-TRI-2005-0073-1665, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
34. Suzanne Seppi, Group Against Smog & Pollution. EPA-HQ-TRI-2005-0073-3034. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
35. Carolyn Akinbami. EPA-HQ-TRI-2005-0073-1721, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
36. American Public Health Association and Children's Environmental Health Network. EPA-HQ-TRI-2005-0073-2023, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
37. Stephanie McCarter-Haag. EPA-HQ-TRI-2005-0073-864, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
38. Bonnie New. EPA-HQ-TRI-2005-0073-595, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
39. D. Radford Shanklin, F.R.S.M. EPA-HQ-TRI-2005-0073-579, Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
40. Bill Kojola, Department of Occupational Safety and Health on behalf of the American Federation of Labor and Congress of Industrial Organizations (AFL-CIO), the California Labor Federation (AFL-CIO), Communications Workers of America (CWA), and the United Steel, Paper, and Forestry, Rubber Manufacturing, Energy, Allied Industrial and Service Workers International Union (USW), EPA-HQ-TRI-2005-0073-4980.1. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
41. Judith Elliott, New Hampshire Coalition for Occupational Safety and Health, EPA-HQ-TRI-2005-0073-725. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
42. New York State Public Employees Federation, AFL-CIO Division 169, EPA-HQ-TRI-2005-0073-2080. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
43. Mary Hutcheson Johns, EPA-HQ-TRI-2005-0073-517. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
44. Mary Gebhard, St. Bede Monastery and Center, EPA-HQ-TRI-2005-0073-3501. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
45. Mary Brigid Clingman, The Dominican Sisters: Grand Rapids, EPA-HQ-TRI-2005-0073-2218. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
46. Faith-based organizations that commented include: the Dominican Sisters: Grand Rapids, EPA-HQ-TRI-2005-0073-2218. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006, The Benedictine Sisters of Beorne, TX, EPA-HQ-TRI-2005-0073-2635. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006, The Benedictine Sisters of Mt. Saint Scholastica, EPA-HQ-TRI-2005-0073-2560. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006, and the St. Bede Monastery and Center, EPA-HQ-TRI-2005-0073-3501. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
47. Susan Mika, The Benedictine Sisters, EPA-HQ-TRI-2005-0073-2635. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
48. Mindy Lubber, Ceres, EPA-HQ-TRI-2005-0073-2473. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
49. Jim Horlacher, First Affirmative Financial Network, EPA-HQ-TRI-2005-0073-2636. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
50. Julie Fox Gorte, Calvert Group, Ltd., EPA-HQ-TRI-2005-0073-1575. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
51. Heidi Soumerai, Walden Asset Management, EPA-HQ-TRI-2005-0073-695. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
52. Lenora Smith, EPA-HQ-TRI-2005-0073-616. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
53. Prof. Andrew King (Dartmouth College), EPA-HQ-TRI-2005-0073-1207. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
54. Kimberley Frederick, College of the Holy Cross, EPA-HQ-TRI-2005-0073-1199. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
55. Joseph A. Gardella, Jr., SUNY Buffalo, EPA-HQ-TRI-2005-0073-1561. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.
56. The Lowell Center for Sustainable Production, UMASS-Lowell, EPA-HQ-TRI-2005-0073-2566. Toxic Release Inventory Burden Reduction Proposed Rule, Environmental Protection Agency, January 30, 2006.

(Commenters supporting one or both proposals are italicized.)

GOVERNMENT

FEDERAL

U.S. Rep. Robert Andrews (D-NJ)
 U.S. Rep. Earl Blumenauer (D-OR)
 U.S. Rep. Robert Brady (D-PA)
 U.S. Rep. Lois Capps (D-CA)
 U.S. Rep. Ben Cardin (D-MD)
 U.S. Rep. Ed Case (D-HI)
 U.S. Rep. John Conyers (D-MI)
 U.S. Rep. Danny Davis (D-IL)
 U.S. Rep. Rosa DeLauro (D-CT)
 U.S. Rep. Lane Evans (D-IL)
 U.S. Rep. Sam Farr (D-CA)
 U.S. Rep. Chaka Fattah (D-PA)
 U.S. Rep. Michael Fitzpatrick (R-PA)
 U.S. Rep. Barney Frank (D-MA)
 U.S. Rep. Gene Green (D-TX)
 U.S. Rep. Raul Grijalva (D-AZ)
 U.S. Rep. Luis Guterres (D-IL)
 U.S. Rep. Alcee Hastings (D-FL)
 U.S. Rep. Maurice Hinchey (D-NY)
 U.S. Rep. Rush Holt (D-NJ)
 U.S. Rep. Michael Honda (D-CA)
 U.S. Rep. Jesse Jackson (D-IL)
 U.S. Rep. Sheila Jackson-Lee (D-TX)

U.S. Rep. Nancy Johnson (R-CT)
 U.S. Rep. Dale Kildee (D-MI)
 U.S. Rep. Dennis Kucinich (D-OH)
 U.S. Rep. John Larson (D-CT)
 U.S. Rep. Barbara Lee (D-CA)
 U.S. Rep. Sander Levin (D-MI)
 U.S. Rep. Daniel Lipinski (D-IL)
 U.S. Rep. Frank LoBiondo (R-NJ)
 U.S. Rep. Stephen Lynch (D-MA)
 U.S. Rep. Carolyn Maloney (D-NY)
 U.S. Rep. James McGovern (D-MA)
 U.S. Rep. Robert Menendez (D-NJ)
 U.S. Rep. George Miller (D-CA)
 U.S. Rep. Gwen Moore (D-WI)
 U.S. Rep. James Moran (D-VA)
 U.S. Rep. Jerrold Nadler (D-NY)
 U.S. Rep. Richard Neal (D-MA)
 U.S. Rep. John Olver (D-MA)
 U.S. Rep. Major Owens (D-NY)
 U.S. Rep. Frank Pallone, Jr. (D-NJ)
 U.S. Rep. Donald Payne (D-NY)
 U.S. Rep. Steve Rothman (D-NJ)
 U.S. Rep. Martin Olav Sabo (D-MN)

U.S. Rep. Loretta Sanchez (D-CA)
 U.S. Rep. Linda Sanchez (D-CA)
 U.S. Rep. Bernie Sanders (I-VT)
 U.S. Rep. James Saxton (R-NJ)
 U.S. Rep. Jan Schakowsky (D-IL)
 U.S. Rep. Allyson Schwartz (D-PA)
 U.S. Rep. Jose Serrano (D-NY)
 U.S. Rep. Christopher Shays (R-CT)
 U.S. Rep. Rob Simmons (R-CT)
 U.S. Rep. Christopher Smith (R-NJ)
 U.S. Rep. Hilda L. Solis (D-CA)
 U.S. Rep. John Tierney (D-MA)
 U.S. Rep. Chris Van Hollen (D-MD)
 U.S. Rep. Henry Waxman (D-CA)
 U.S. Rep. Lynn Woolsey (D-CA)
 U.S. Sen. Barbara Boxer (D-CA)
 U.S. Sen. Hillary Rodham Clinton (D-NY)
 U.S. Sen. Jim Jeffords (I-VT)
 U.S. Sen. John McCain (R-AZ)
 U.S. Sen. Barack Obama (D-IL)
 U.S. Sen. Ron Wyden (D-OR)
U.S. Small Business Administration
U.S. Department of Energy

STATE

Association of Local Air Pollution Control Officers
 Association of New Jersey Environmental Commissions
 California Assemblywoman Ira Ruskin
 California Assemblywoman Wilma Chan
 California Department of Toxic Substances Control
 California State Attorney General
 California State Controller
 Connecticut State Attorney General
 Delaware Department of Natural Resources and Environmental Control
 Delaware State Rep. Greg Lavalle
 Delaware State Sen. Bob Valihura
 Delaware State Sen. Cathy Cloutier

Hazardous Waste and Toxics Reduction Program, Washington State Department of Ecology
 Illinois State Attorney General
 Iowa State Attorney General
 Maine Department of Environmental Protection
 Maryland State Attorney General
 Massachusetts Department of Environmental Protection
 Massachusetts State Attorney General
 Michigan Department of Environmental Quality
 Minnesota Pollution Control Agency
 Minnesota Rep. Jim Davnie
 Minnesota Rep. Melissa Hortman

Minnesota Rep. Mindy Greiling
 Minnesota Rep. Tina Liebling
 Minnesota Sen. Chuck Wiger
 Minnesota Sen. D. Scott Dibble
 Minnesota Sen. Ellen Anderson
 Minnesota Sen. Jane Ranum
 Minnesota Sen. John Hottinger
 Minnesota Sen. John Marty
 Minnesota Sen. Linda Berglin
 Minnesota Sen. Linda Higgins
 Minnesota Sen. Richard Cohen
 Minnesota Sen. Sandra L. Pappas
 Minnesota Sen. Satveer Chauchary
 Minnesota Sen. Wes Skoglund
 New Hampshire Rep. Betty Hall

New Hampshire Rep. Derek Owen
New Hampshire State Attorney General
New Jersey Department of Environmental Protection
New Jersey State Attorney General
New Mexico State Attorney General
New York State Attorney General
New York State Department of Environmental Conservation
Northeast States for Coordinated Air Use Management
Northeast Waste Management Officials' Association
Ohio Environmental Protection Agency
Oklahoma Department of Environmental Quality
Oregon Department of Environmental Quality
Pennsylvania Department of Environmental Protection
Pennsylvania Department of Labor & Industry
Pennsylvania Rep. Stephen E. Barrar
Pennsylvania Rep. Thomas Blackwell IV
Pennsylvania Rep. Mark Cohen
Pennsylvania Rep. Lawrence Curry
Pennsylvania Rep. Frank Dermody
Pennsylvania Rep. H. William DeWeese
Pennsylvania Rep. Todd Eachus
Pennsylvania Rep. Dwight D. Evans
Pennsylvania Rep. Dan Frankel

Pennsylvania Rep. Robert Freeman
Pennsylvania Rep. Michael Gerber
Pennsylvania Rep. Marc Gergely
Pennsylvania Rep. Robert Godshall
Pennsylvania Rep. Richard Grucela
Pennsylvania Rep. Babette Josephs
Pennsylvania Rep. Thaddeus Kirkland
Pennsylvania Rep. Nick Kotik
Pennsylvania Rep. Frank LaGrotta
Pennsylvania Rep. Daylin Leach
Pennsylvania Rep. David Levdansky
Pennsylvania Rep. John Maher
Pennsylvania Rep. Jennifer Mann
Pennsylvania Rep. Michael P. McGeehan
Pennsylvania Rep. Charles McIlhinney
Pennsylvania Rep. Scott Petri
Pennsylvania Rep. Frank Pistella
Pennsylvania Rep. Ron Raymond
Pennsylvania Rep. Harry Readshaw
Pennsylvania Rep. James R. Roebuck
Pennsylvania Rep. T.J. Rooney
Pennsylvania Rep. Carole Rubley
Pennsylvania Rep. Steve Samuelson
Pennsylvania Rep. Curt Schroder
Pennsylvania Rep. Josh Shapiro
Pennsylvania Rep. Timothy Solobay
Pennsylvania Rep. David Steil
Pennsylvania Rep. Michael Sturla
Pennsylvania Rep. Dan Surra

Pennsylvania Rep. Elinor Taylor
Pennsylvania Rep. W. Curtis Thomas
Pennsylvania Rep. Michael Veon
Pennsylvania Rep. Greg Vitali
Pennsylvania Rep. Don Walko
Pennsylvania Rep. Jake Wheatley Jr.
Pennsylvania Sen. Lisa Boscola
Pennsylvania Sen. Wayne Fontana
Pennsylvania Sen. Jim Ferlo
Pennsylvania Sen. Vincent Fumo
Pennsylvania Sen. Stewart Greenleaf
Pennsylvania Sen. Vincent Hughes
Pennsylvania Sen. Gerald LaValle
Pennsylvania Sen. Sean Logan
Pennsylvania Sen. Anthony Williams
Pennsylvania Sen. Connie Williams
Puget Sound Action Team, Office of the Governor, WA
South Carolina Department of Health and Environmental Control
State and Territorial Air Pollution Program Administrators
Vermont State Attorney General
Washington State Department of Ecology
Waste Programs Division and Air Quality Division, Arizona Department of Environmental Quality
Wisconsin State Attorney General

LOCAL

Allegheny County Council President Rich Fitzgerald, PA
Allegheny County Councilman Dave Fawcett, PA
Allegheny County Councilwoman Joan Cleary, PA
California Councilman Felipe Aguirre, City of Maywood
California Region 1 LEPC Member Linda K. Phillips

City of Philadelphia Councilman Michael Nutter, PA
City of Philadelphia Councilwoman Donna Reed Miller, PA
City of Philadelphia Department of Public Health
Denver Department of Environmental Health
Florida Commissioner Katy Sorenson, Miami-Dade County
Hampden Community Council, MD

Montgomery County Health Department, Norristown PA
New York Legislator Brian X. Foley, Suffolk County
New York Legislator Daniel P. Losquadro, Suffolk County
Racine Board of Health, Racine WI
United States Conference of Mayors
West Florida Regional Planning Council
Planning Technician Sherry Starling

INDUSTRY

COMPANIES

APT Enterprises
Atlanta Pool and Supply
Dominion
Eastman Chemical Company
Eureka Natural Foods

GE Corporate Environmental Programs, L.L.C.
Hazard Analysis Consulting
Laughing Water
LCSWorldwide
Onyx Environmental Services

Peabody Energy
SC Johnson & Son, Inc.
Real Food Market and Deli, Inc.
Spectrum Organic Products
Waste Management Inc.

ASSOCIATIONS

The Aluminum Association
American Forest & Paper Association
American Petroleum Institute
American Public Power Association
American Wire Producers
Association Connecting Electronics Industries
Consumer Specialty Products Association
Edison Electric Institute

The Graphic Arts Coalition
Metals Industries Recycling Coalition
National Association of Manufacturers
National Council Air and Stream Improvement
National Federation of Independent Business
National Grain and Feed Association
Grain Elevator and Processing Society
National Paint and Coating Association

National Petrochemical and Refiners Association
National Ready Mixed Concrete Association
Performance Track Participants Association
Portland Cement Association
Society of Glass and Ceramic Decorators
The Society of the Plastics Industry, Inc.

PUBLIC INTEREST

Action for a Clean Environment
Action Now
ActionPA
Acton Citizens for Environmental Safety
Advocates for a Cleaner Environment
Advocates for Environmental Human Rights
Alabama Environmental Council
Alaska Community Action on Toxics
Alaskans for Responsible Mining
Alliance For a Clean Environment
Altamaha Riverkeeper
American Libraries Association
American Association of Law Libraries
American Bottom Conservancy
American Rivers
American Society of Newspaper Editors
Americans for Democratic Action
The Annie Appleseed Project
Apalachicola Riverkeeper
Arab Community Center for Economic and Social Services
Arizona Public Interest Research Group
Arkansas River Coalition
Associated Press Managing Editors
Association of Alternative Newsweeklies

Association of Research Libraries
Atchafalaya Basinkeeper
Atlantic States Legal Foundation
Baykeeper
Bayview Hunters Point Community Advocates
Beyond Pesticides
Black Warrior Riverkeeper
Blue Skies Alliance
BOLD Teens of Boston
Breath of Life
Buckeye Environmental Network
Building Movement Project
California Communities Against Toxics
California Indian Basketweavers Association
California Rural Legal Assistance Foundation
Californians Aware
Camden County Branch of the National Association for the Advancement of Colored People
Casco Baykeeper
Catawba Riverkeeper
Center for American Progress
Center for Corporate Policy
Center for Energy Efficiency and Renewable Technologies

Center for Health, Environment & Justice
Center for International Environmental Law
Center for Media and Democracy
Center for Science in the Public Interest
Center on Race, Poverty & the Environment
Central Jersey Environmental Justice Alliance
Chester Riverkeeper
Citizens Against a Radioactive Environment
Citizens Against Ruining the Environment
Citizens Campaign for the Environment
Citizens Environmental Alliance
Citizens for Environmental Justice
Citizens for Just Democracy
Citizens for Safe Water Around Badger
Clean Air Council
Clean Air Task Force
Clean Ocean Action
Clean Water Action
Clean Water Action Wisconsin
Clean Water Action San Francisco
Clean Water for North Carolina
Coalition Against Toxics
Coalition for Paving Frazier Park Roads
Coalition of Journalists for Open Government
Colorado Riverkeeper

Columbia River Inter-Tribal Fish Commission	Friends of the Lower Greenbrier River	Louisiana Bayoukeeper, Inc.
Common Cause	Gaia Defense League	Lower Mississippi Riverkeeper
Communities for a Better Environment	Galveston - Houston Association for Smog Prevention	Lower Neuse Riverkeeper
Community Health and Environmental Coalition of New Brunswick	Global Community Monitor	Lower Susquehanna Riverkeeper
Community In-Power and Development Association	Government Accountability Project	Mankato Area Environmentalists
Community Labor Refinery Tracking Committee	Grand Riverkeeper Oklahoma	Maryland Public Interest Research Group
Concerned Citizens of Long Branch	Grand Traverse Baykeeper	Massachusetts Public Interest Research Group
Consumers Union	Grassroots Coalition of Connecticut	Michigan Environmental Council
Cook Inlet Keeper	Great Lakes United	Michigan Public Interest Research Group
Co-op America	The Green Guide Institute	Midwest Environmental Advocates, Inc.
Crude Accountability	Greenpeace	Military Toxics Project
DataCenter	Group Against Smog & Pollution	Milwaukee Riverkeeper
Delaware Riverkeeper	Gulf Restoration Network	Mobile Baykeeper
Detroit Riverkeeper	Hackensack Riverkeeper	Montana Coalition for Health, Environment and Economic Rights
Detroiters for Environmental Justice	Heal the Bay	Nantucket Soundkeeper
Don't Waste Arizona	Help Save the Apalachicola River Group	Narragansett Baykeeper
Downwinders At Risk	Housatonic Riverkeeper	National Black Environmental Justice Network
Earth Day Coalition	Housing & Community Development Network of NJ	National Bucket Brigade Coalition
Earth Day Network	Hudson Riverkeeper	National Consumer Law Center
Earthjustice	Hurricane Creekkeeper	National Consumers League
Earthworks	Indigenous Environmental Network	National Environmental Trust
Ecology Center of Ann Arbor	Informed Choices	National Environmental Trust California
Edison Wetlands	Inland Empire Waterkeeper	National Environmental Trust Maine
Environment California	Institute for Agriculture & Trade Policy	National Environmental Trust Minnesota
Environment Colorado	The Institute for Food and Development Policy/ Food First	National Environmental Trust New Hampshire Chapter
Environment Maine Research and Policy Center	Integrative Strategy Forum	National Environmental Trust South Dakota
Environmental Community Action, Inc.	International Center for Technology Assessment	National Freedom of Information Coalition
Environmental Community Organization	International Relations Center	National Pollution Prevention Roundtable
Environmental Defense	Iowa Public Interest Research Group	National Priorities Project
Environmental Integrity Project	Kansas Natural Resource Council	Natural Resources Defense Council
Environmental Justice Consultants	Kansas Riverkeeper	The Nature Conservancy Eastern Resource Office
Environmental League of Massachusetts	Kentucky Resources Council	Needful Provision, Inc.
Environmental Working Group	Klamath Riverkeeper	New Hampshire Public Interest Research Group
Erie County Environmental Coalition	Lake Ontario Waterkeeper	New Jersey Citizen Action
Families Concerned About Nerve Gas Incineration	League of Women Voters	New Jersey Environmental Lobby
Florida Consumer Action Network	League of Women Voters California	New Jersey Foundation for Open Government
Florida Public Interest Research Group	League of Women Voters Maine	New Jersey Public Interest Research Group
Florida Wildlife Federation	League of Women Voters Minnesota	New Mexico Public Interest Research Group
Food & Water Watch	League of Women Voters New Hampshire	New Riverkeeper
Food Industry Environmental Network	League of Women Voters Tennessee	New Jersey Environmental Federation
Foodfirst Institute for Food and Development Policy	Legal Environmental Assistance Foundation	New York Environmental Law and Justice Project
For a Better Bronx	Life of the Land	New York-New Jersey Baykeeper
Fort Ord Environmental Justice Network	Literacy for Environmental Justice	Noise Pollution Clearinghouse
Friends of the Earth	Los Nietos Neighborhood Community Safety Watch Group	North American Hazardous Materials Management Association
		North Carolina Conservation Network

North Carolina Public Interest Research Group	Puget Soundkeeper Alliance	Sustainable Energy and Economic Development Coalition
North Jersey Environmental Justice Alliance	Raritan Riverkeeper	Sustainable South Bronx
North Sound Baykeeper	Relational Culture Institute	Texas Public Interest Research Group
Northeast Pennsylvania Audubon Society	Renewable Resources Coalition	Tip of the Mitt Waterkeeper
Northern Virginia Trout Unlimited	Reporters Committee for Freedom of the Press	Tremley Point Alliance
Northwest Coalition for Alternatives to Pesticides	Residents of Pico Rivera for Environmental Justice	Tualatin Riverkeepers
Northwest District Association's Health & Environment Committee	Restore Explicit Symmetry to Our Ravaged Earth	U.S. Public Interest Research Group
Oceana	Rhode Island Public Interest Research Group	Upper Chattahoochee Riverkeeper
Ogeechee-Canoochee Riverkeeper	Rubbertown Emergency Action Community Taskforce	Upper Coosa Riverkeeper
Ohio Citizen Action	San Diego Coastkeeper	Upper St. Lawrence Riverkeeper
Ohio Environmental Council	San Luis Obispo Coastkeeper	Upper Susquehanna Riverkeeper
Ohio Public Interest Research Group	Santa Monica Baykeeper	Valley Watch, Inc.
OMB Watch	Savannah Riverkeeper, Inc.	Vermont Public Interest Research Group
OpenTheGovernment.org	SE American Association of Law Libraries	Wabash Riverkeeper
Orange County Coastkeeper	Seyvern Riverkeeper	Wasatch Clean Air Coalition
Oregon State Public Interest Research Group	Sierra Club	Washington State Public Interest Research Group
Oregon Toxics Alliance	Sierra Club Calusa Group	Waterkeepers Alliance
Pacific Institute	Sierra Club Houston Regional Group	West Harlem Environmental Action
Pamlico-Tar Riverkeeper	Sierra Club National Environmental Justice Grassroots Organizing Program	West Michigan Environmental Action Council
Parents For Clean Air	Silicon Valley Toxics Coalition	West Oakland Environmental Indicators Project
Partnership for a Sustainable Future	Society of Environmental Journalists	West Virginia Headwaters Waterkeeper
Patapsco Riverkeeper	Society of Professional Journalists	West/Rhode Riverkeeper
Paterson Task Force for Community Action	South Jersey Environmental Justice Alliance	Western Lake Erie Waterkeeper
People for Puget Sound	South Riverkeeper	WildLaw Florida Office
People's Community Organization for Reform and Empowerment	South Texas Colonias Initiative, Inc.	Willamette Riverkeeper
Pesticide Action Network North America	Space Coast Progressive Alliance	William A. Vasquez Institute
Pines Lake Garden Club	St. Clair Channelkeeper	Wisconsin Public Interest Research Group
Pipeline Safety Trust	St. Lucie Audubon Society	Women's Voices for the Earth
Planning and Conservation League	Steven & Michele Kirsch Foundation	World Resources Institute
Policy Development	Stewards of the St. Johns River, Inc.	World Trade Center Environmental Organization
Prince William Soundkeeper	Save the Oak Ridge Moraine Coalition	World Wildlife Fund
Protect All Children's Environment	Strategic Counsel on Corporate Accountability	Youghiogheny Riverkeeper
Public Citizen		

PUBLIC HEALTH

ORGANIZATIONS

Alliance for Healthy Homes	Association of Community Health Nursing Educators	Children's Environmental Health Network
American Association of People with Disabilities	Asthma & Allergy Foundation of America	Children's Health Environmental Coalition
American Association on Mental Retardation	Breast Cancer Action	Commonweal
American Lung Association	Breast Cancer Fund	Environment and Human Health, Inc.
American Public Health Association	California Safe Schools	Environmental Health Coalition
The Arc and United Cerebral Palsy Disability Policy Collaboration	Center for Environmental Health	Environmental Health Fund
		Environmental Health Strategy Center

Endometriosis Association
Health Care Without Harm
Healthy Building Network
Healthy Kids: The Key to Basics
Healthy Schools Network
Institute for Children's Environmental Health

John Snow Institute
Massachusetts Coalition of Families & Advocates
for the Retarded
National Center for Environmental Health
Strategies
Pacific Redwood Medical Group

Physicians for Social Responsibility
Safe Food and Fertilizer
Science and Environmental Health Network
Southern California Public Health Association

PROFESSIONALS

Carolyn Akinbami, Pediatrician, Seattle WA
Jane Baker, Public Health Nurse, San Francisco
CA
Michelle Boyle, Registered Nurse, PA
Doyle H. Brown, Medical Doctor, Pleasanton CA
James Carroll, Family Physician, Bakersville NC
Dr. D.K. & F.L. Cinquemani, Doctor, Largo FL
J. Michael Cline, Physician, 3M Corporate
Occupational Medicine, St. Paul MN
Jim Diamond, Physician, Berkeley CA
Diane Drum, Public Health Nurse, Portland OR
James and Penny Lynn Dunn, Physician, Ironton
MO
Kristen Engle, Surgeon, Oakland CA
Deborah Fields, Pediatrician, Greensboro NC

Beth Goldberg Shaine, Pediatric Nurse, Amherst
MA
Frederic L. Hamburg, Pediatrician, Springfield MO
Norma B. Hamilton, Medical Doctor, FL
Dr. Van & Lois Hamilton, Doctor, Santa Barbara
CA
James Huff, PhD, National Institute of
Environmental Health Sciences, National
Institutes of Health
Richard Kanner, University of Utah Health
Sciences Center, Salt Lake City UT
Katie Lajoie, Registered Nurse, Charlestown NH
Deborah Leiner, Pediatrician, Greensboro NC
Cynthia Li, Primary Care Doctor, San Francisco CA
Francie Lightfine, Nurse, St. Charles IL

Stephanie McCarter-Haag, Physician, Point TX
Dorothy Merritt, Medical Doctor, Texas City TX
Bonnie New, Physician, Houston TX
George Dean Patterson, Doctor of Osteopathy
Gilbert P. Rose, Public Health Nurse, Crofton MD
Donald Round, Clinical Neuropsychologist,
Cranston RI
R. L. Sauer, Medical Doctor, Preston MN
Dr. Robert and Mrs. Linda Schure, Medical Doctor,
Arlee MT
Megan Schwarzman, Physician, San Francisco CA
Jane Stangel, Licensed Mental Health Counselor,
Calumet IN
Catherine Thomasson, Physician, Portland OR

LABOR

Aluminum Plant Maintenance Mechanics
American Federation of Government Employees
American Federation of Government Employees
District 2
American Federation of Labor and Congress of
Industrial Organizations
American Federation of State, County and
Municipal Employees
American Federation of State, County and
Municipal Employees, Council 1
American Federation of State, County, and
Municipal Employees, New Jersey
California Coalition for Occupational Safety and
Health
California Labor Federation
Canadian Labor Congress
Center for Women & Work, University of
Massachusetts Lowell
Central/Northern Coalition of Black Trade
Unionists
Coalition of Black Trade Unions
Comite Pro Uno

Communications Workers of America
Communications Workers of America District 1
Communications Workers of America Local 1034
Communications Workers of America Local 1037
Communications Workers of America Local 1032
Communications Workers of America Local 1081
Health Professionals and Allied Employees
International Brotherhood of Teamsters Local
8773
Ironbound Community Corp.
Just Transition Alliance
Massachusetts Coalition for Occupational Health
and Safety
New Hampshire Coalition for Occupational
Health and Safety
New Jersey Industrial Union Council
New Jersey Labor Against the War
New Jersey Work Environment Council
New Labor Union
New York Coalition for Occupational Health and
Safety

New York State Public Employees Federation
AFL-CIO, Division 169
Occupational Training and Education
Consortium, Rutgers University
Southeast Michigan Coalition of Occupational
Safety and Health
Tykulsker and Associates, Montclair NJ
United Auto Workers
United Food & Commercial Workers
United Food and Commercial Workers Local
1360
UNITE HERE
United Steelworkers
United Steelworkers District 4
United Steelworkers District 12
United Steelworkers Local 675
United Steelworkers Local 149
United Steelworkers Northeast Resource Center
Western NY Coalition for Occupational Health
and Safety

FAITH

ORGANIZATIONS

The Benedictine Sisters of Mount St. Scholastica
The Benedictine Sisters of Boerne TX
Black Ministers' Council of NJ
Greenfaith

Lutheran Metropolitan Ministry Advocacy Taskforce
Sisters of St. Joseph of Carondelet St. Louis Province
The Dominican Sisters of Grand Rapids MI

INDIVIDUALS

Pastor Mary Hutcheson Johns, Colonial Heights VA
Sister Mary Gebhard, Eau Claire WI

INVESTMENT

Calvert Group Ltd.
Ceres
Citizens Advisers
Domini Social Investments
Ethical Investment Research Services
First Affirmative Financial Network
Friends Fiduciary Corporation
Harrington Investments, Inc.

Innovest
Institutional Shareholder Services, Inc.
Interfaith Center on Corporate Responsibility
Mercy Investment Program
Neuberger Berman's Socially Responsive Investment Group
Pax World Management Corp.
Portfolio 21

Progressive Investment Management
Social Investment Forum
Social Investment Research Analysts Network
Socially Responsible Investment Coalition
SRI World Group
Walden Asset Management

RESEARCHERS

ORGANIZATIONS

American Association for the Advancement of Science
Environmental Politics and Policy, University of Montana

EnviroSpec
Edmonds Institute
Federation of American Scientists
Lowell Center for Sustainable Production

Political Economy Research Institute
Union of Concerned Scientists

INDIVIDUALS

Troy Abel, University of Wisconsin, Green Bay
Lori S. Benneer, Professor of Environmental Economics and Policy, Duke University
Kathleen Burns, Ph.D., Director of Sciencecorps
Gerrit Crouse, Scientist, Dickinson College
Lauren Dietrich, Academic, Palo Alto CA
Neil Frazer, Professor of Environmental Science, University of Hawaii
Kimberly Frederick, Professor of Chemistry, College of the Holy Cross
Joseph A. Gardella, Jr., Professor of Chemistry, University of Buffalo
Sean Garrett-Roe, PhD, Chemist, Oakland CA
Michael Greenstone, Professor of Economics, Massachusetts Institute of Technology
Dr. Maughn Gregory, Montclair State University, Montclair NJ
Frank Hajcak, PhD, Researcher
Michael K. Heiman, Department of Environmental Studies, Dickinson College
David Katz, Environmental Economics Lecturer, Ann Arbor MI
Andrew King, Professor of Business Administration, Dartmouth College

Daniel Dewberry, Scientist, Austin TX
Michael Kraft, University of Wisconsin, Green Bay
Dr. Lynton S. Land, Emeritus Professor of Geological Sciences, Austin TX
Melanie Loot, Professor, University of Illinois
Holiday Matchett, Science Teacher, Zamora CA
Robert M. Manyik, PhD Chemist, St. Albans WV
Cindy McComas, Director of Minnesota Technical Assistance Program, University of Minnesota
Rachel Morello-Frosch, Environmental Health Scientist, Providence RI
D. Radford Shanklin, Chemist and Research Biologist, Memphis TN
John O'Sullivan, Professor of Social Science, Gainesville State College
Chris Paget, Researcher, Columbia SC
Cathy Pedler, Mercyhurst College
Michael Reitera, Delaware State University Academic
Christine Rosen, Assistant Professor, Haas Business School, University of California Berkeley

Beth Rosenberg, Assistant Professor of Public Health & Family Medicine Tufts University School of Medicine
Michael V. Russo, Professor of Sustainable Management, University of Oregon
Robin Saha, Social Science Researcher, Missoula MT
Lenora Smith, Community Health Researcher, Durham NC
Mark Stephan, Washington State University at Vancouver
John A. Stewart, Environmental Justice Researcher, University of Harford
Joel Tarr, Professor of History and Policy, Carnegie Mellon University
John Veranth, Professor of Pharmacology/Toxicology, University of Utah
Cynthia Walter, PhD
Cliff Webber, Academic Research Fellow, Auburn University
Keith D. West, Professor of Geography/Geology, University of Wisconsin, Marinette

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