



Department of Energy

Washington, DC 20585

March 11, 2005

EPA Docket Center
Mail Code 28221T
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attention Docket ID No. TRI-2004-0001

Dear Sir or Madam:

Re: Toxics Release Inventory Reporting Forms Modification Rule

On January 20, 2005, the U.S. Environmental Protection Agency published a proposed rule revising certain requirements for the Toxics Release Inventory (TRI) reporting program. The U.S. Department of Energy (DOE) appreciates the opportunity to comment on the burden reduction options published in the *Federal Register* (70 FR 1674). The Department is supportive of efforts to streamline TRI reporting and eliminate redundant requests for information on the TRI reporting Forms A and R. In particular, DOE supports:

- removing latitude and longitude fields and using the Facility Registry System (FRS) to provide the EPA permit and program ID numbers in Section 4 of Forms A and R. However, consideration should be given to how to update the FRS data in a timely manner if a TRI reporter finds inaccuracies in these automatically-populated fields;
- removal of the requirement in Section 5.3, Column C to determine the percentage of total quantity of toxic chemicals contributed by storm water for purposes of TRI reporting;
- replacing both the hazardous waste treatment codes used in section 7A---On-Site Waste Treatment Methods and Efficiency, Column B and the current sixteen recycling codes used in Section 7C---On-Site Recycling Process with codes used in EPA's Biennial Hazardous Waste Report; and
- eliminating Column C; using ranges rather than a specific number in Column D; and eliminating column E in Section 7A---On-Site Waste Treatment Methods and Efficiency.

DOE believes these changes would result in more efficient and expeditious TRI reporting. In addition, commonality of data in the RCRA and TRI databases should also facilitate better interpretation of the information available in both databases.

Notwithstanding, consideration will need to be given to State agencies that do not have adequate computer resources to receive electronic versions of the forms and, thus, request only paper copies. Such agencies should be made fully aware that these fields will no longer be available on the paper copies of the TRI Forms and will have to be accessed on-line through EPA's database.

If you have any questions or need further clarification of our comments, please contact Jane Powers of my staff at 202-586-7301, or jane.powers@eh.doe.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Traceski', with a stylized flourish at the end.

Thomas T. Traceski
Director
Office of Pollution Prevention
and Resource Conservation