



**OFFICE OF ADVOCACY  
U.S. SMALL BUSINESS ADMINISTRATION  
WASHINGTON, DC 20416**

April 14, 2004

The Honorable Kimberly T. Nelson  
Assistant Administrator for Environmental Information  
U.S. Environmental Protection Agency  
Ariel Rios Building, 2810A  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

**Re: Proposed Reforms to the Toxics Release Inventory Program:  
Streamlining Reporting and Preserving Data Integrity**

Dear Assistant Administrator Nelson:

As we promised in the February 4<sup>th</sup> letter to you, we have enclosed a copy of a report prepared by our contractor, Jack Faucett Associates, providing findings and recommendations for improvements to the Toxics Release Inventory program. We applaud EPA's efforts in this area and hope that your work will lead to paperwork burden relief for TRI reporters by July 2005 (for the 2004 Reporting Year).

We recommended specific changes to TRI reporting (specifically revisions to the Form A, and development of a Form NS) in our September 2, 2003 comment letter on the the agency's Information Collection Request. The contractor report provides a detailed analysis of some of the regulatory alternatives that EPA should be considering for revisions to the TRI reporting requirements. While the report contains the standard disclaimer which appears on all of our contractor reports that the report does not "necessarily" represent the views of our office or other Federal agencies, our office does generally agree with the conclusions and recommendations of this report. We also recommend that EPA consider other regulatory options that reduce reporting burden and maintain the integrity of the TRI database in its future rulemaking activity. The Office of

Advocacy looks forward to working together on this important task. If you have any questions or comments, please feel free to call me or Assistant Chief Counsel Kevin Bromberg at (202) 205-6964, or email at [kevin.bromberg@sba.gov](mailto:kevin.bromberg@sba.gov).

Sincerely,

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Thomas M. Sullivan  
Chief Counsel for Advocacy

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Kevin L. Bromberg  
Assistant Chief Counsel for Advocacy

Enclosure