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A Consideration of Whole-Life Carbon Emissions by Indiana Manufacturers in Efforts to Gauge Lifecycle Sustainability Records in the Multinational Automobile Industry



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# A Consideration of Whole-Life Carbon Emissions by Indiana Manufacturers in Efforts to Gauge Lifecycle Sustainability Records in the Multinational Automobile Industry

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#### Abstract

**Purpose:** The Ricardo Report (2020) recommends a holistic analysis of the effects of the global auto industry on sustainability by assessing the impacts of automobiles on the environment throughout their lifecycle. Much of the literature on sustainability in the transportation sector focuses on vehicle exhaust emissions and their contribution to urban smog, and there has been little consideration of emissions produced during the automobile manufacturing process itself.

**Materials and Methods:** This study builds on the lifecycle emissions approach recommended by the Ricardo Report. Specifically, data on the pounds of pollution emitted was collected from the Toxic Release Inventory report of major multinational automobile producers and analyzed via piecewise linear regression analyses to provide insight about the pollution emitted during a vehicle's production. **Findings:** The findings in this study will fill a gap in Ricardo's "birth to grave" proposal to quantify whole-life carbon emissions in the automobile sector.

Unique Contribution to Theory, Practice and Policy: As sustainability efforts within the automotive market continues to evolve, it is important to analyze automobile whole-life carbon emissions rather than just what is emitted from the tailpipe, and this study fills a gap in the Ricardo Report by providing data related to the rates of pollution emitted during the manufacture of vehicles at multinational automobile factories in America.

**Keywords:** Whole Life Car Emissions, Sustainable Manufacturing, Global Supply Logistics, Multinational Automobile Industry, Emissions Rates



# **1.0 INTRODUCTION**

Historically, the analysis of a vehicle's carbon footprint has only considered emissions from the tailpipe during its usage, whereas most literature associated with the automobile industry's carbon emissions impact has focused on pollution during this stage of the product. However, significant pollution is also emitted during both the creation and disposal of a vehicle. Whole life carbon emissions encompass the total greenhouse gas emissions associated with a product from manufacturing to disposal, and this study performed piecewise linear regression analyses to gauge pollution rates during the manufacture of vehicles, filling a gap in the 2020 Ricardo Report, which recommended a whole life carbon emissions approach to assessing the carbon footprint of a vehicle.

## 2.0 LITERATURE REVIEW

Air pollution has been the subject of scientific study for centuries (Pott, 1775; Carson, 1962; Perkins, 1974; Stern et al., 1984). In particular, research has shown that exposure to poor air quality results in deteriorated health. Munzel et al. (2017) concluded that air pollution, when added to usual loud noise, contributes to more than 75% of general human environmental stressors and disease in urbanized societies. The United Nations (2019) stated that poor air quality is lowering global life expectancy, causing long-term health problems, and killing 7 million people per year. Governments around the world have taken action or been called on to take action to address poor air quality (Taylor, 2008; Gardiner, 2019; Issitt, 2019). International institutions have implemented broad air quality policies with varied success, such as the Kyoto Protocol (1997), the Paris Climate Agreement (2015), and the COP28 (2023). The United States federal government became active in regulating air pollution in the twentieth century with the enactment of the 1963 Clean Air Act (Davidson & Norbeck, 2011; Carlson & Burtraw, 2019).

Air quality advocates have often focused on organizations involved in logistics such as the aerospace and combustion engine sectors. Through all its modes, the transportation sector (also referred to as the transport sector in the literature from Europe) accounts for about a quarter of global CO<sub>2</sub> emissions, mainly from passenger vehicle emissions (Solaymani, 2019). The literature and political discourse have addressed the pollution caused by these vehicles, particularly the exhaust they produced (Faiz et al., 1996; Innes, 1996; Rhys-Tyler et al, 2011; Dey & Mehta, 2020; Kalghatgi et al., 2023). Broadcast media stories in this realm have often focused on bad actors such as case of the Volkswagen emissions scandal (Ewing, 2017; Siano et al., 2017; Li et al., 2018; Jung & Sharon, 2019).

In the United States, air quality alerts have become increasingly common means of warning about the poor quality of local air. These alerts play a meaningful role in quality-of-life factors in communities across America (Chen et al., 2018; Sachdev, 2022; Schulte, 2022). Poor air quality is often associated with smog or air pollution, defined as "pollutants that contribute to poor air quality including particulate matter (PM), nitrogen oxides (NO<sub>x</sub>), and volatile organic compounds (VOCs)" (EPA, 2024, para. 2). Recent warnings have taken into account the wind drifting from the Canadian wildfires in the summer of 2023 (Kekatos, 2023; Savage, 2023). Another factor contributing to poor air quality is the downwind pollution from the Rust Belt to the northeast. Concerns about this drifting pollution prompted the implementation of the 2011 Cross-State Air Pollution Rule (CSAPR) (Rapp, 2015; Jeffrey, 2016). Today, levels of air toxins are commonly measured in pursuit of public transparency for local air quality, including mobile compounds such

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as benzene, formaldehyde, and diesel particulate matter that are known or suspected to cause cancer or other serious health and environmental effects.

Sustainability efforts for regulations and other means of limiting pollution originating from the transportation sector have often focused on the grey/black smoke emitted from vehicle tail pipes (Yanowitz & McCormick, 2009; Zhang et al., 2015; Anenberg et al., 2019; Giechaskiel et al, 2019; Bej & Chattaraj, 2023). Legislation limiting tailpipe emissions has evolved through milestones in regulatory enforcement history, but it is often based on historical precedents such as catalytic converter innovations, engine standards, and tailpipe filters (Regulatory Timeline. 2024). Stakeholders have recently argued that additional factors should be considered, and new proposals have sprung up related to the quantifying of carbon emissions. In particular, the seminal Ricardo Report, published in 2020, outlined the impacts of pollution produced across the entire lifecycle of the vehicle. "With the shift to new fuels and powertrain electrification it is more important to use lifecycle assessment (LCA) approaches in assessing the relative impacts of different options on a holistic basis" (Ricardo Energy & Environment, 2020, para. 2). The Ricardo Report recommends cradle-to-grave LCA analyses starting from the extraction of raw materials that form the components and energy for the creation of the automobile through to the "end-oflife", or disposal of the vehicle and/or its parts.

Tan et al. (2011) initially recommended the concept of "whole-lifecycle automotive manufacturing", an accounting method for the emissions processes throughout the entire auto industry from raw material melting to "recycling" that could then become standardized. Lee (2012) similarly proposed a standardized process of measuring emissions across the automobile supply chain. Further, Lisowski et al. (2020) recommended an agreed-upon series of environmental standards and criteria including more than just emissions during use of the vehicle that could assess progress in the industry as a framework for sustainability across global stakeholders.

Berners-Lee and Clark (2010) initially reported about the pollution emitted during the production of a vehicle and found that a small vehicle emits 6 metric tons of CO<sub>2</sub> equivalent, whereas an SUV produced 35 metric tons of CO<sub>2</sub> equivalent. Campbell (2022) later reported that about 10% of a vehicle's lifelong CO<sub>2</sub> emissions occur during its production, equating to about 5.6 tons of CO<sub>2</sub> being released during the manufacture of a gasoline- or diesel-powered vehicle, whereas about 5% of emissions comes from the disposal process. Low Carbon Vehicle Partnership (2020) attempted to quantify emissions across the lifecycle of a vehicle or an automobile's "Whole-Life Carbon Emissions Analysis" and conceded that "Life cycle analysis is still in its infancy, with few defined process and standards" (p. 3). As such, their report estimates that the manufacture of standard (traditional) gasoline-powered vehicles produces 5.6 metric tons of CO<sub>2</sub> equivalent pollution with higher amounts of CO<sub>2</sub> emitted during the manufacture of hybrids (6.5), plug-in hybrids (6.7), and battery-electric vehicles (8.8).

There are major gaps in the literature in regard to whole-life carbon emissions in the multinational automobile industry, but buoyed by the Ricardo Report (2020), more recent focus is directed at pollution emitted during the manufacture of vehicles. Berners-Lee and Clark (2010) noted the difficulty in quantifying total pollution when calculating a vehicle's carbon footprint because the electricity used by all the supply chain vendors in extracting the metals should be considered. Els (2021) surmised that "the carbon footprint of making a car is immensely complex to track. Ores have to be dug out of the ground and the minerals extracted" (para. 2), creating additional



emissions. Electric vehicles (EVs) are responsible for more emissions during production compared to combustion-engine vehicles. Manufacturing EVs adds 8.8 tons of  $CO_2$ , 43% of which occurs during the production of the electric battery, compared to 5.6 tons during the manufacture of a diesel- or gasoline-powered vehicle (Campbell, 2022).

The Ricardo Report (2020) conceded that additional methodologies should be developed and standardized by governments and/or global institutions for comparing various automobile life cycle stages to provide a framework for emissions standards. However, because sustainability in the multinational automobile industry has often been reactive to regulations and edicts of international institutions (Iguchi, 2015; Selim et al., 2020), quantifying carbon emissions via whole-life carbon emissions and setting standards in the industry is truly central to future quality-of-life issues due to increased salience related to air quality standards.

Answering the call from the Ricardo Report to develop a method of measuring emissions throughout the automobile lifecycle, this study aims to fill the void in the literature by ascertaining the rates of pollution produced in the manufacture of vehicles. In particular, whole-life carbon emissions in the automobile industry will be analyzed by assessing emissions rates of the Toyota, Subaru, and Honda factories in the state of Indiana. The automotive industry is a disproportionately high contributor to the Indiana economy (employing 459% higher than the national average) (IEDC Automotive Council, 2016) as well as a main contributor to carbon emissions, and this study will compare trends in these Indiana-based automakers' emissions rates via key points in regulatory enforcement history, including when strict emissions edicts affected model years 2012, 2013, 2017, and 2018 and beyond (Regulatory Timeline, 2024).

Findings from this analysis will fill a gap in the Ricardo Report and provide a proper quantitative analysis of emissions rates during the production of vehicles. This research will underpin similar efforts to assess other multinational automobile factories across the country in efforts to analyze emissions rates during the production of those vehicles. Further, emissions rates related to the disposal of a vehicle should be additionally included in order to adequately assess accurate whole life carbon emissions rates within the automobile industry.

# **3.0 MATERIALS AND METHODS**

Each year, the United States Environmental Protection Agency (EPA) publishes the Toxic Release Inventory (TRI), a publicly available database containing information on the release of toxic chemicals (Antisdel, 2017), including those emitted into the air and water/ground. Data from the TRI were mined for the purposes of this study. Various chemicals covered include those that cause significant chronic, acute, and adverse health effects (including cancer). Data about chemicals released during the production process were analyzed using a cross-sectional analysis and included total on-site releases, total pounds of chemicals transferred off-site for recycling, total pounds transferred off-site for disposal, and total pounds transferred off-site for energy recovery (see Appendix A).

The three largest multinational automobile factories in Indiana are Honda, Subaru, and Toyota. A search of the TRI found five facilities in Indiana that included "Honda", "Toyota", or "Subaru" in their names (see Appendix B for the process utilized to filter). Two more were found that included "Honda", "Toyota", or "Subaru" in their parent company names. The EPA also performed a manual search to confirm that there were no more or less of those listings (Swenson, 2023),



showing that seven reports appeared with Honda, Subaru, and Toyota in the facility or parent company names appear in the TRI from 2010-2022 (see Table 1 below).

	TRI_FACI		
	LITY_ID	FACILITY_NAME	STANDARDIZED_PARENT_COMPANY
1	4631WHS	HOIST MATERIAL	TOYOTA INDUSTRIES NORTH
	TLF447RA	HANDLING INC.	AMERICA
2	47202TYT	TOYOTA MATERIAL	TOYOTA INDUSTRIES NORTH
	ND5555I	HANDLING INC.	AMERICA
3		TOYOTA MOTOR	TOYOTA MOTOR ENGINEERING &
	47670TYT	MANUFACTURING INDIANA	MANUFACTURING NORTH AMERICA
	MT4000T	INC	INC
4	4724WHN	HONDA DEVELOPLEMENT	
	DMN2755	& MANUFACTURING LLC -	
	Ν	IAP	AMERICAN HONDA MOTOR CO INC
5	47903SBR	SUBARU OF INDIANA	
	SZ5500S	AUTOMOTIVE INC	SUBARU CORP
6	4767WTY	TOYOTA BOSHOKU	
	TBS733S1	INDIANA LLC	TOYOTA BOSHOKU AMERICA
7	4613WPR		
	MMC211C	PREMIUM COMPOSITE	
	М	TECHNOLOGY NA	TOYOTA TSUSHO AMERICA INC

 Table 1: TRI Listings of Auto Factories in Indiana Emitting Pollution

Of the seven companies listed in Table 1, #1 and #7 were excluded because Hoist was determined to be based in East Chicago IN, and Premium Composite was found to be based in Franklin IN, rather than in the cities where the factories are located. From subsequent research, these organizations were determined to not to be associated with vehicle production. However, further investigation should ascertain whether they produced direct components that were then shipped those to factories, thus potentially meriting inclusion in the emissions totals. The two additional affiliated organizations with "Toyota" in the parent company names - #3 (Toyota Motor Manufacturing Indiana Inc) and #6 (Toyota Boshoku Indiana LLC) - were found to be based in Princeton, IN (the factory site of Toyota) and were included in the pollution total for Toyota because they were deemed to be producing a component of the final vehicle on-site.

It was presumed that most if not all the emitted pounds of total on-site and off-site disposal or releases of chemicals (total reported, composite pollution) were due to pollution emitted during a part of the vehicle's production process since no other products beyond the automobiles were produced at those facilities and as such were included. This assumption was especially relevant for Toyota Boshoku (#6 in Table 1), a separate entity but still located in Princeton and presumably on site. There is a caveat in the "total pollution" column "TOTAL\_ON\_OFF\_SITE\_RELEASE~" (see appendix F) for Toyota Boshoku, which stood out as an outlier because other years' annual total pollution was just 12% of this annual amount. After inquiry, the EPA noted that "I did look up this facility's 2010 reporting form for toluene, and it does show 8,839 pounds being transferred off site for 'other waste management" (Swenson, 2023). Since the global "great recession" was generally fully recovered economically by 2010 that was the first year in which data was mined. The rest was reported as on-site stack air releases" (Swenson, 2023). Since this unique amount of



pollution was presumed to originate on site, was included as part of the production process for the final vehicle and included for purposes of this experimental design.

The total vehicles produced was the independent variable, which was utilized to more precisely analyze the total percentage of changes in pollution being emitted from those factories during a calendar year. Internal information related to the production of units of vehicles per year was not available for all model years, so this study utilized total American vehicle sales for each of those models as the independent variable. A limitation of this approach is that some of the vehicles produced in those factories might ultimately have been sold in Canada or Mexico, or some might have been manufactured outside of the US and sold in the US.

Model years were confirmed for manufacture in those factories and were identified by the average number of pounds each vehicle weighed. Honda Civics, CR-Vs, and Acura ILXs were manufactured in their Greensburg, IN factory. Toyota produced Highlanders, Siennas, and Sequoias (note that production of vehicles changed during that timeframe when Highlanders shifted to being produced at Toyota's Texas facility) at their Princeton factory. Subaru was dismissed from further analysis in the study due to lack of available public data for annual vehicles produced during those years. As such, the independent variable was annual unit sales of those models of Honda and Toyota vehicles, multiplied by their weights to equal total pounds of vehicles produced (see Appendices D and E). As such, the final data output utilized emissions per pound based on pounds of vehicles manufactured.

With the independent variable in this study as pounds of vehicles produced during a calendar year and the dependent variable as total pollution/emissions (by pound), a cross-sectional analysis focused on any significant change point in the time series, particularly in relation to any of the regulatory enforcement milestones from the (2024) Regulatory Timeline. Figure 1 shows the experimental design with the transformation with the formula weighted annual total emissions (*a*) by the annual total weights of vehicles produced; because the weighted values were too small, they were multiplied by  $10^5$ , yielding  $10^5 a/(wb)$ .

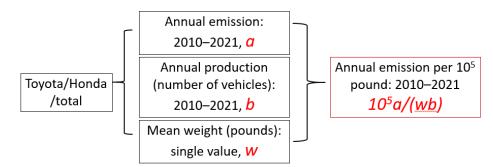


Figure 1: Experimental Design (Piecewise Linear Regression Analyses) for This Cross-sectional Study

Piecewise linear regression analyses (PLRA) were performed for both the total (raw) emissions and the weighted emissions. PLRA is a distinctive quantitative approach used to ascertain potential significant change points over time (the point at which any changes occur in the time series; in this case, if Honda and/or Toyota witnessed a shift in the weighted or raw emissions). PLRA involves a process based on iteratively searching for the years both before and after. The models were segmented and the *R*-squared and mean squared error (MSE) were calculated for

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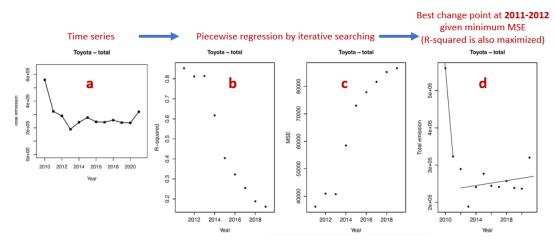
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purposes of assessing variation, whereas the larger *R*-squared and the smaller MSE, the better the model fit or goodness-of-fit statistics (a technique to assess the result of a primary or secondary outcome variable). The cross-section of data was iteratively filtered to locate which model was the best fit so that any statistically significant change points could be identified (Muggeo, 2008; Crawley, 2012).

# 4.0 FINDINGS

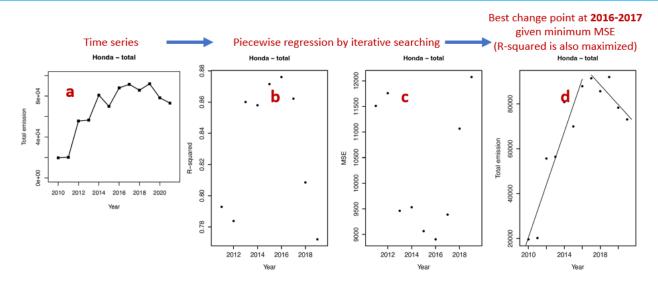
Figure 2 shows the time series from 2010-2021 for Toyota's raw emissions (2022 was not included since the model was not able to determine changes in the year after because 2023 was not yet included in the TRI database). Graphs b and c summarize the results of *R*-squared and MSE from the PLRA each year. *R*-squared is the largest (Graph b) and MSE is the smallest (Graph c) in 2011. Thus, it can be concluded that Toyota's total raw emissions decreased significantly in 2011 and again in 2012. Graph d illustrates how the piecewise regression model provides the change point.



## Figure 2: Toyota Total Raw Emissions

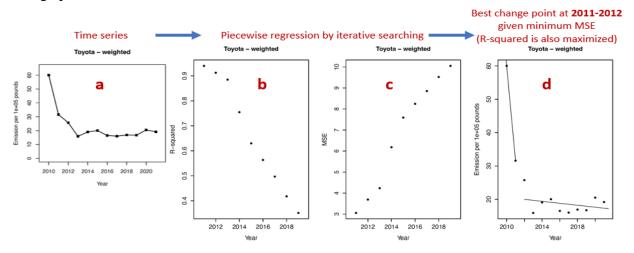
Figure 3 shows the time series of annual total emissions from 2010-2021 for Honda's raw emissions with the same processes of PLRA being applied. Graphs b and c summarize the results of *R*-squared and MSE for each year, showing that *R*-squared is the largest and MSE is the smallest in 2016. This indicates that Honda's total emissions in 2016 increased at a noteworthy level, and a similar trend occurred in 2017. Graph d illustrates the PLRA's results in 2016 and into 2017.

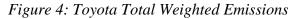




#### Figure 3: Honda Total Raw Emissions

PLRA was performed for Toyota for weighted emissions, which additionally factored in annual pounds of vehicles produced. Figure 4 shows the time series for annual weighted emissions. Graphs b and c summarize the results of R-squared and MSE from the PLRA. R-squared is the largest and MSE is the smallest in 2011, suggesting that Toyota's weighted emissions decreased at a significant rate in 2011 (and also into 2012). Taking into consideration vehicles produced (by pound) resulted in the same output. Graph d additionally shows the visual illustration of that change point



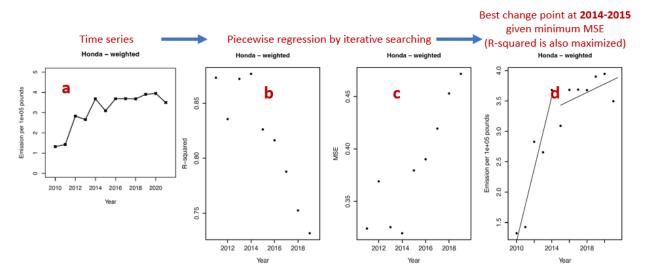


The same analysis was performed for Honda's weighted emissions. The results are illustrated in Figure 5. Graphs b and c summarize the results of *R*-squared and MSE; *R*-squared is the largest and MSE is the smallest in 2014. Thus, Honda witnessed significantly higher weighted emissions in 2014. Graph d shows the PLRA model for 2014, with similar results for subsequent years. As such, factoring in vehicles produced (by pound), Honda increased their weighted emissions in 2014 and continued to do so into 2015.

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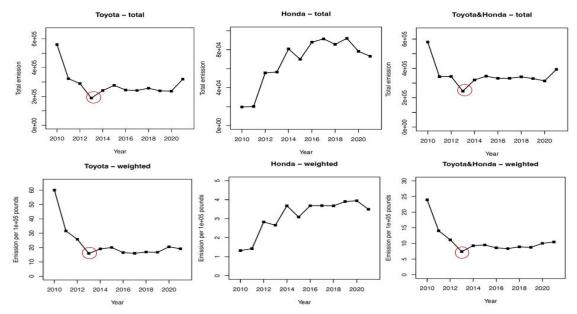
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#### Figure 5: Honda Total Weighted Emissions

Since southern Indiana air quality is impacted by total emissions from both factories, Toyota and Honda totals were combined. The analysis was run again and produced a still-statistically significant change point around 2012 and 2013, as seen in the time series graphs on the far right of both the top and bottom rows of Figure 6 marked by the red circles. Since air quality was the initial purview of this study, it can be claimed that 2012 witnessed significantly decreased raw and weighted emissions from these combined (Toyota plus Honda) southern-Indiana automakers, contributing to cleaner air in that region. Future studies should be conducted of southern-Indiana's air quality records before and after 2012 to observe if any changes occurred, but since Greensburg is on the east side of the state, Ohio air quality records (the state to the east) might be more relevant for an analysis of the effects of the CSAPR.



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Figure 6: Total Emissions and Weighted Emissions

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The difference in Honda's emissions change points between raw emissions and weighted emissions is worthy of further analysis. Raw emissions increased in 2016 and into 2017, but weighted emissions increased in 2014 and into 2015, indicating that Honda factories were not able to produce additional vehicles at the same emissions rate per pound during that timeframe. Honda's relatively stable emissions trend beyond 2017 for weighted emissions should be noted as well as the decrease in weighted emissions in 2021, indicating emissions per pound of vehicles produced remained consistent.

### **Reactions/Future Studies**

Toyota's raw emissions and weighted emissions had similar change points (but at decreasing pollution levels), so the period of relative stability from 2014-2020 is worthy of note. In addition, the most common hazardous chemicals emitted from the factories by pounds were trimethyl benzene, butyl alcohol, and certain glycol ethers, so the effects of these three chemicals and trends related to them should be investigated further, particularly as it relates to air quality measurements. Further inquiry should assess the two facilities associated with Toyota as a parent company that were not based near Princeton. Another topic of future research is to determine how much if any of the reported pollution was contamination of soil rather than the air. For 2017 and 2018, Honda's raw emissions increased, and any rationale would be noteworthy to consider.

Whether the change point shifts were the results of proactive internal processes or reactions to current or future external issues such as regulations, the Toyota shift resulted in better air quality and the Honda shift resulted in worse air quality, although Honda's has remained stable recently. It is possible that these two organizations made conscious decisions to alter the trajectories of their emissions rates through strategic or accidental changes in internal processes, but questions might arise regarding any practical significance of the changes in emissions vis-à-vis the Regulatory Timeline (2024) (determined to be in 2012, 2013, 2017, and 2018). Whereas Toyota's change point in emissions coincided with the period 2012/2013, in 2012 the EPA extended the federal program to extend "fuel economy" for medium-duty passenger vehicles (which the Sienna would be classified as) in model years 2017 through 2025. Particularly if internal processes were proactive, Toyota's Princeton factory could very well provide a template for regulatory compliance if its leaders had planned for regulatory changes ahead of time. Another possible precipitator of change in Toyota's internal processes might be the 2011 CSAPR, which was the impetus for further legislation directed at fossil fuels in the federal energy sector and fully took effect in 2013. Toyota's change point could be critically analyzed from the perspective of any proactive measures taken in the lead-up to the implementation of the CSAPR to mitigate penalties for contaminated air from its factories floating with wind patterns north-east-east to Ohio and other states.

As the automotive market continues to evolve, it is important to analyze automobile whole-life carbon emissions rather than just what is emitted from the tailpipe. This consideration should be utilized in assessing and judging the holistic impact of the multinational automobile industry on air quality and overall climate change. Global footprints have been a focus of legislation and international institutions advocating for sustainability, and the study from the Low Carbon Vehicle Partnership (2020) can be utilized as a template for identifying the variables for analyses of whole-life carbon emissions of vehicles including emission rates for both disposal and production.

As it relates to the goal to assess whole-life carbon emissions of vehicles, the pollution emitted during the entire lifecycle of the vehicle itself is of paramount importance. It is especially relevant



if EVs are responsible for more emissions in their manufacture and disposal. Attention to wholelife carbon emissions should continue in literature, academia, and the global multinational automobile industry.



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# Appendix A.

Variables Mined from TRI

			CIT	STA	ZIP				
TRI_F	FACIL	STREE	Y_N	TE_	_C	CHE	TRI_	REPOR	TOTAL_ON_
ACILI	ITY_N	T_ADD	AM	ABB	OD	M_N	CHE	TING_	OFF_SITE_R
TY_ID	AME	RESS	E	R	Е	AME	M_ID	YEAR	ELEASE~

#### Appendix B.

#### **TRI Filtering Process**

Query 1: See just the total releases for each facility over the last 12 years

- 1. Go to the "EZ-Search" reports in the TRI Section of Envirofacts
- at https://www.epa.gov/enviro/tri-ez-search 2. Scroll down the page and click on the "Releases Brief" report. It's the 9<sup>th</sup> one down. 3. Select the following data elements by clicking on the check box in front of their names.

  - a. TRI Facility Id b. Facility Name
  - c. Street Address d. City Name

  - e. State Abbreviation f. Zip Code

  - g. Reporting Year h. <u>SUM(</u>Total On Off Site Release)

For the last one, be sure to click on the check box in front of the "Sum" function for "Total On and <u>Off Site</u> Releases" and not the check box in front of the data element name "Total On and Off Site Releases". See image below:

#### Appendix C.

#### Dependent Variable, TOTAL\_ON\_OFF\_SITE\_RELEASE, 2010-2021, Honda and Toyota

TRI_FACILITY_ID	FACILITY_NAME	STREET_ADDRESS	CITY_NAME	ST/	ZIP_CO	REPOF	TOTAL_ON_OFF_SITE_RELEASE
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2021	320027.2
1724WHNDMN2755	HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2021	73106.518
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2021	137.579
17670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2020	236631.3
1767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2020	113.996
1724WHNDMN2755	HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2020	78323.53
1767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2019	113.796
1724WHNDMN2755	HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2019	91993.34
17670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2019	238804
17670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2018	256886.6
1724WHNDMN2755	HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2018	85667
1767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2018	114.126
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2017	116.286
1724WHNDMN2755	HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2017	91453.45
17670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2017	241455.7
724WHNDMN2755	HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2016	87902.74
7670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2016	244267.6
767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2016	167.002
7670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2015	276746.6
767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2015	202.4
724WHNDMN2755	HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2015	69966.38
767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2014	158.2
724WHNDMN2755	HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2014	80834.21
7670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2014	240768.2
767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2013	0
7670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2013	188597.5
724WHNDMN2755	HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2013	56458
767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2012	0
7670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2012	289371
724WHNDMN2755	HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2012	55679
7670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2011	323216
767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2011	34.1999
1724WHNDMN2755	HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2011	20243
1767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2010	8875.0209
17670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2010	550973
1724WHNDMN2755	HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2010	19651



TRI_FACILITY_ID	FACILITY_NAME	STREET_ADDRESS	CITY_NAME	ST/	ZIP_CO	REPOR	TOTAL_ON_OFF_SITE_RELEA	SE~
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2021	320027.2	
4724WHNDMN2755	N HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2021	73106.518	
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2021	137.579	
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2020	236631.3	
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2020	113.996	
4724WHNDMN2755	N HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2020	78323.53	
4767WTYT85733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2019	113.796	
4724WHNDMN2755	N HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2019	91993.34	
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2019	238804	
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2018	256886.6	
4724WHNDMN2755	N HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2018	85667	
4767WTYT8573351	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2018	114.126	
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2017	116.286	
4724WHNDMN2755	N HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2017	91453.45	
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2017	241455.7	
4724WHNDMN2755	N HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2016	87902.74	
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2016	244267.6	
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2016	167.002	
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2015	276746.6	
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2015	202.4	
4724WHNDMN2755	N HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2015	69966.38	
4767WTYT8573351	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2014	158.2	
4724WHNDMN2755	N HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2014	80834.21	
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2014	240768.2	
4767WTYT8573351	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2013	0	
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2013	188597.5	
4724WHNDMN2755	N HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2013	56458	
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2012	0	
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2012	289371	
4724WHNDMN2755	N HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2012	55679	
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2011	323216	
4767WTYT8573351	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2011	34.1999	
4724WHNDMN2755	N HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2011	20243	
4767WTYT8573351	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2010	8875.0209	
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2010	550973	
4724WHNDMN2755	N HONDA DEVELOPLEMENT & MANUFACTURING LLC - IAP	2755 N. MICHIGAN AVE.	GREENSBURG	IN	47240	2010	19651	

# Appendix D.

Independent Variable, Model and Pounds per Vehicle, Honda

	Honda Civi	c Sales in US	Honda CR	t-V Sales in US	Honda Acu	a ILX Sales in US
	2,977 lbs	avg weight	3493 lbs	avg. weight	3096 lbs a	ivg. weight
2008	339,289	2.50%	2008	197,279		
2009	259,722	-23.5%	2009	191,214		
2010	260,218	0.20%	2010	203,714	2012	12,250
2011	221,235	-15.0%	2011	218,373	2013	20,430
2012	317,909	43.70%	2012	281,652	2014	17,850
2013	336,180	5.70%	2013	303,904	2015	18,530
2014	325,981	-3.0%	2014	335,019	2016	14,597
2015	335,384	2.90%	2015	345,647	2017	11,757
2016	366,927	9.40%	2016	357,335	2018	11,273
2017	377,266	2.80%	2017	377,895	2019	14,685
2018	325,760	-13.7%	2018	379,013	2020	13,414
2019	325,650	-0.0%	2019	384,168	2021	13,900
2020	261,225	-19.8%	2020	333,502	2022	6,296
2021	263,787	1.00%	2021	361,271		
2022	133,932	-49.2%	2022	238,155		

# Appendix E.

Independent Variable, Model and Pounds per Vehicle, Toyota

US	Sequoia Sales in	Toyota	les	Sienna Sa	Toyota	oyota Highlander Sales in US			
	s. avg. veight		reigł			 4287.5 lbs average weight			
	9.925(24)	2000		105,499	2003	7.456(91)	92,121	2010	
	68.574[24]	2001		159.119(55)	2004	4.549[92]	101,252	2011	
	70.187(25)	2002		161,380	2005	5.921(95)	121.055(94)	2012	
	67.067(25)	2003		163.269(56)	2006	5.070(95)	127.572[96]	2013	
Т	58.114(26)	2004		138,162	2007	3.621(99)	146.127[98]	2014	
Т	45.904(26)	2005		115,944	2008	4.015[102]	158.915[101]	2015	
Τ	34.315(28)	2006		84,064	2009	5.976[105]	191.379[104]	2016	
Т	23.273[28]	2007		98.337(57)	2010	16.864[108]	215.775[107]	2017	
	30.693(29)	2008		111.429(57)	2011	3.236[111]	244.511[110]	2018	
Τ	16.387[27]	2009		114.725(58)	2012	10.127[111]	239.438[111]	2019	
Τ	13.848[27]	2010		121.117(59)	2013	48,455	212.276[114]	2020	
Т	13.022[30]	2011		124.502(60)	2014	65.167(116)	264.128[116]	2021	
Τ	13.151(30)	2012		137.497[61]	2015	43,711	222.805[118]	2022	
Т	13.811[31]	2013		127.791(62)	2016				
Τ	11.806[32]	2014		111.489(63)	2017				
Τ	12.583(33)	2015		87.672[64]	2018				
Τ	12.771[34]	2016		73.585(65)	2019				
	12.156(35)	2017		42.885[66]	2020				
	11.121(35)	2018		107.990(67)	2021				
	10.289(36)	2019							
	7.364(37)	2020							
	8,070	2021							
	5.314(38)	2022							



# Appendix F.

## Miscellaneous Row Depicting Toyota Boshoku's Total on/off-site Release from 2010

TRI_FACILITY_ID	FACILITY_NAME	STREET_ADDRESS	CITY_NAME	STATE_ABBR	ZIP_CODE	REPORTING_YEAR 1	OTAL_ON_OFF_SITE_RELEASE~
613WPRMMC211CM	PREMIUM COMPOSITE TECHNOLOGY NA	2101 COMMERCE PARKWAY	FRANKLIN	IN	46131	2013	0
4613WPRMMC211CM	PREMIUM COMPOSITE TECHNOLOGY NA	2101 COMMERCE PARKWAY	FRANKLIN	IN	46131	2014	0
4613WPRMMC211CM	PREMIUM COMPOSITE TECHNOLOGY NA	2101 COMMERCE PARKWAY	FRANKLIN	IN	46131	2015	1680
4613WPRMMC211CM	PREMIUM COMPOSITE TECHNOLOGY NA	2101 COMMERCE PARKWAY	FRANKLIN	IN	46131	2016	2470.72
4613WPRMMC211CM	PREMIUM COMPOSITE TECHNOLOGY NA	2101 COMMERCE PARKWAY	FRANKLIN	IN	46131	2017	1553.78
4613WPRMMC211CM	PREMIUM COMPOSITE TECHNOLOGY NA	2101 COMMERCE PARKWAY	FRANKLIN	IN	46131	2018	1531.23
4613WPRMMC211CM	PREMIUM COMPOSITE TECHNOLOGY NA	2101 COMMERCE PARKWAY	FRANKLIN	IN	46131	2019	1499
4631WHSTLF447RA	HOIST MATERIAL HANDLING INC.	4407 RAILROAD AVE	EAST CHICAGO	IN	46312	2016	0
4631WHSTLF447RA	HOIST MATERIAL HANDLING INC.	4407 RAILROAD AVE	EAST CHICAGO	IN	46312	2017	5.61
4631WHSTLF447RA	HOIST MATERIAL HANDLING INC.	4407 RAILROAD AVE	EAST CHICAGO	IN	46312	2018	88544.75
4631WHSTLF447RA	HOIST MATERIAL HANDLING INC.	4407 RAILROAD AVE	EAST CHICAGO	IN	46312	2019	1190
4631WHSTLF447RA	HOIST MATERIAL HANDLING INC.	4407 RAILROAD AVE	EAST CHICAGO	IN	46312	2020	393
4631WHSTLF447RA	HOIST MATERIAL HANDLING INC.	4407 RAILROAD AVE	EAST CHICAGO	IN	46312	2021	275
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2019	238804
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2020	236631.3
47670TYTMT4000T	TOYOTA MOTOR MANUFACTURING INDIANA INC	4000 TULIP TREE DR	PRINCETON	IN	47670	2021	320027.2
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2010	8875.02089
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2011	34.1999
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2012	0
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2013	0
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2014	158.2
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2015	202.4
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2016	167.002
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2017	116.286
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2018	114.126
4767WTYTBS733S1	TOYOTA BOSHOKU INDIANA LLC	733 W. 150 SOUTH	PRINCETON	IN	47670	2019	113.796
176718/TVTDC70001		722 W/ 150 COUTU	DRINGETON	INI	17670	2020	112 006