

# Environmental Integrity Project

ANNUAL REPORT, 2021



*Fighting for Clean Air and Water, Helping  
Communities Take Action*



## THE ENVIRONMENTAL INTEGRITY PROJECT

The Environmental Integrity Project is a nonpartisan, nonprofit organization established in March of 2002 by former EPA enforcement attorneys to advocate for effective enforcement of environmental laws. EIP has three goals: 1) to provide objective analyses of how the failure to enforce or implement environmental laws increases pollution and affects public health; 2) to hold federal and state agencies, as well as individual corporations, accountable for failing to enforce or comply with environmental laws; and 3) to help local communities obtain the protection of environmental laws.

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### PHOTO CREDITS:

Cover photo: Shenandoah River, EIP's Tom Pelton. Additional photos: University of Texas, Wikimedia Commons ; natural gas processing plant, New Mexico, WildEarth Guardians ; Whiting, Indiana, Wikimedia Commons ; Chesapeake Bay, Eastern Shore, Ken Lund/flickr ; Eastern Shore poultry operation, EIP's Tom Pelton ; Houston fenceline community, iLCP ; ExxonMobil petrochemical facility, Houston, One Breath Partnership;

# EIP Annual Report 2021:

## *Fighting for Clean Air and Water, Helping Communities Take Action*

**I**n 2021, despite turbulent times, with a lingering global pandemic and political upheaval, the Environmental Integrity Project continued to advance with determination towards our goals, especially fighting big polluters and addressing environmental justice imperatives. We targeted oil, gas, and petrochemical plants because their emissions are some of the most dangerous to public health and because the industry is the fastest growing source of greenhouse gases in the U.S. For example, because of our legal efforts last year, a BP oil refinery in Whiting, Indiana – one of the oldest and largest refineries in the world – will have to pay a \$512,450 penalty for its illegal emissions of soot-like particles that trigger asthma and heart attacks. The plant will also have to impose better monitoring and controls on this air pollution. EIP's victory over BP in Northern Indiana was important because two thirds of the people who live within a mile of the Whiting refinery on the shores of Lake Michigan are people of color, and more than forty percent are low income.

We pride ourselves on original research and investigative reporting that bring long-hidden problems to light and drive real change. For example, in June 2021, EIP released a report showing that Maryland's emissions of methane and greenhouse gases from landfills were four times higher than the state's estimates. After we published our report, the Maryland Department of the Environment acknowledged we were right, corrected their emissions inventory, and proposed new state regulations to better control air pollution from landfills. As a follow up to this, we confronted the national problem of EPA's under-estimation of landfill emissions. In December, we advised EPA that we would file a lawsuit against the agency if it does not correct an inaccurate methodology for calculating landfill emissions across the U.S.

In October, EIP released a groundbreaking report that revealed Maryland's lack of oversight or enforcement of frequent water pollution violations by the poultry industry on the Eastern Shore. EIP's examination of more than 5,000 pages of Maryland Department of the Environment (MDE) records found that 84 percent of poultry operations inspected from 2017-2020 failed clean water act permit requirements, but only two percent were penalized by the state. As a result of our report, along with a state senate oversight hearing that grilled Maryland's Secretary of the Environment about the lapses in enforcement, MDE in January MDE pledged



*EIP released a ground-breaking report that revealed Maryland's lack of oversight or enforcement of violations by the poultry industry.*

to increase inspections of poultry operations by 50 percent in 2022 and hire additional poultry inspectors.

Over the last several years, we have continued building a strong base of data and technical expertise about pollution sources across the U.S. that can be useful to grassroots activists, journalists, and the general public, while providing attorneys and academic experts with information to meet their specific needs. In February 2022, EIP launched an interactive website called “[Oil & Gas Watch](#),” that is packed with information about more than 600 oil, gas, and petrochemical projects that have recently begun operating, are under construction, or still seeking permits to build. The website includes data for 166 pipelines that link upstream oil and gas production to the downstream manufacture of fuel, chemicals, fertilizers, plastics, and other hydrocarbon-based products. Our partners are already using this data to help identify new permit applications in time to mobilize opposition to projects that are ill-conceived, will add tons of carbon to the atmosphere, or overwhelm local communities already disproportionately affected by the industry’s pollution.

We have complemented this effort with the technical assistance that EIP provides to communities through our new Center for Applied Environmental Science (CAES). This new center helps to identify and pay for experts needed to evaluate the impact that big new projects will have on local air and water quality, as well as their likely contributions to global warming. Most of the technical assistance provided through CAES benefits disadvantaged communities that are disproportionately affected by new or existing sources



*EIP established a \$60,000 scholarship at the University of Texas to help cover tuition and cost of living expenses for law students with a special interest in environmental justice.*

of pollution, and about 80 percent of the projects fall within the oil, gas, or petrochemical sector. Expert opinion can have a big impact on permit decisions. For example, an expert report funded by CAES helped persuade New York to require a full environmental impact assessment of a proposed garbage project, including an evaluation of its contribution to global warming.

And finally, in 2021 we established a \$60,000 scholarship at the University of Texas to help cover tuition and cost of living expenses for law students with a special interest in environmental justice. The initiative

complements a similar commitment we made to the University of Maryland’s law school in 2020, and we hope both of these programs can help to encourage a more diverse pool of environmental attorneys dedicated to serving communities that are in dire need of help.

It was a great year, despite the challenges. In the following sections, we will detail our 2021 accomplishments in our different program areas, including EPA Watch, Oil, Gas, And Coal, Environmental Justice, and Biomass, and our successful regional efforts in Texas, the Chesapeake Bay watershed, and Western Pennsylvania.



## EPA Watch

In our program called “EPA Watch,” which centers around our watchdog work and oversight of the federal government’s role in controlling pollution, we took the following actions in 2021:

**Demanded EPA Investigate Texas for Pollution-Driven Civil Rights Violations.** In August, EIP represented the Port Arthur Community Action Network in petitioning the EPA to launch an investigation into whether Texas violated the civil rights of a mostly African American community by allowing dangerous amounts of air pollution to pour from an industrial plant for years, without any modern pollution controls. In October, EPA agreed to investigate the Texas Commission on Environmental Quality’s lax treatment of the 85-year-old Oxbow Calcining plant, which processes an oil refining byproduct called petroleum coke that is used as a fuel and as an ingredient in metals.

**Pushed EPA to Strengthen Standards for Slaughterhouse Water Pollution.** In September, EPA announced that it will update water pollution control standards for the slaughterhouse industry following a December 2019 lawsuit from community and conservation organizations, including EIP. More than 8 billion chickens, 100 million pigs, and 30 million cattle are processed each year in more than 7,000 slaughterhouses across the country. An estimated 4,700 of these slaughterhouses discharge polluted water to waterways, including the iconic Chesapeake Bay, either directly or indirectly through municipal sewage treatment plants.

**Demanded That EPA Update Industry Water Pollution Technology Standards.** In September, EIP and 60 allied organizations, including Waterkeeper Alliance and Earthjustice, sent a letter to EPA Administrator Michael Regan demanding that the agency repair its annual review process to update its water pollution standards on the eve of the 50<sup>th</sup> anniversary of the 1972 Clean Water Act. Two thirds of EPA’s water pollution standards for industries are more than 30 years old, despite a Clean Water Act requirement that they be reviewed every year to keep pace with improving pollution control technology, according to a review of federal regulations.

**Petitioned EPA to Take Over Texas’ Broken System for Controlling Water Pollution.** In September, EIP and twenty other groups filed a petition with EPA to take over and repair Texas’ broken system of issuing permits to control water pollution, which has made it too easy for industries to contaminate waterways across the state. Water pollution is a major problem in Texas, with 9,711 miles of the state’s rivers, 590,214 acres of its lakes, and 1,248 square miles of its estuaries so polluted they are considered “impaired” under the federal Clean Water Act. To control this pollution, EPA delegated authority to Texas to



*EPA released final regulations that will require natural gas processing plants to start publicly reporting the toxic chemicals they release after years of pressure from EIP and other environmental groups.*

administer a federal permitting program that sets limits for polluters. But Texas has failed in its responsibilities by not requiring that polluters document the economic or social necessity of projects that harm downstream water quality and demonstrate that there are no viable alternatives.

**Gained More Public Disclosure of Toxic Air Pollution from Gas Industry.** In December, EPA released final regulations that will require natural gas processing plants to start publicly reporting the toxic chemicals they release. EIP worked with 18 allied organizations, including the Sierra Club and Natural Resources Defense Council, to sue EPA in January 2015 to require natural gas processing plants to start reporting their pollution to EPA's Toxics Release Inventory, an online public database that has existed for thirty years and to which most other industries have long reported.

**Took Legal Action to Ensure EPA Updates Its Methods for Estimating Landfill Emissions.** In December, EIP and two other organizations filed a notice of intent to sue EPA for failing to update its methods for estimating emissions of greenhouse gases and other air pollutants from landfills across the U.S., despite the agency's conclusion in 2008 that the current methods underestimate emissions by at least 25 percent. EIP, Chesapeake Climate Action Network, and Sierra Club filed their notice of intent to sue EPA under the Clean Air Act, which requires the agency to review and, if necessary, revise its emissions calculation methods every three years.

## Oil, Gas, and Coal

**Worked With PA DEP To Allow Public Input On Shale Gas Wastewater Permits.** In February, EIP and five other environmental groups reached an agreement with the Pennsylvania Department of Environmental Protection to begin soliciting community input on 49 wastewater storage and reuse permits issued under a state drilling permit program. The organizations were deeply concerned about the lack of opportunity for public input from residents who live nearby these 49 shale gas operations sites that were granted DEP permits in December and January.

**Monitored Power Plant Carbon Dioxide Pollution.** In February, EIP released the report "Greenhouse Gases from Power Plants: 2005-2020," showing that greenhouse gas emissions from U.S. power plants plummeted 38 percent from 2005 to 2020, even more rapidly than the goals in the Obama-era Clean Power Plan and achieved more than a decade early. Driving the decline was a shift away from the burning of coal, driven by technological advances and cheaper prices for natural gas, wind, and solar power, as well as by environmental rules that forced coal power plants to pay for more pollution controls.

**Helped Close a Coal Ash Waste Site.** In March, The owners of the Montour Power Plant in PA signed a settlement agreement with the Middle Susquehanna Riverkeeper Association, represented by attorneys at the Environmental Integrity Project, that pledges to close a coal ash waste disposal site and donate a 165-acre lake, 640-acre nature preserve, and \$1.2 million to conservation efforts. Talen Energy signed the agreement to address



*After an EIP lawsuit, A federal judge ruled that the more than century-old BP Whiting Refinery on Lake Michigan, repeatedly violated legal limits on deadly soot-like particulate air pollution.*

reported pollution from an ash dump adjacent to the company's 49-year-old coal-fired power plant, located an hour north of Harrisburg.

**Held BP Liable for Years of Air Pollution Violations at Refinery on Lake Michigan.** In April, A federal judge ruled that the more than century-old BP Whiting Refinery on Lake Michigan, one of the nation's largest refineries, repeatedly violated legal limits on deadly soot-like particulate air pollution. The decision by the U.S. District Court in Northern Indiana was a major victory for the Sierra Club, represented by attorneys with the Environmental Integrity Project. The groups had sued BP over air pollution violations at

the Whiting Plant, which sprawls over 1,400 acres in Whiting, East Chicago, and Hammond. In December, it was determined that BP must pay \$512,450 in penalties and increase the use of air pollution control systems at the refinery.

## Western Pennsylvania

**Challenged and Defeated Proposed Western PA Power Plant.** In October, EIP and The Clean Air Council defeated the Beech Hollow power plant, a proposed 1,000-megawatt gas-fired power plant whose air pollution permit was officially terminated. If built, the plant would have been an enormous source of dangerous air pollution and greenhouse gases in a region where residents already suffer from some of the worst air quality in the entire United States. The announcement came after Clean Air Council, represented by its own attorneys and the Environmental Integrity Project, challenged an air permit that DEP had granted for the project in June 2021. The groups filed a second appeal when DEP, in an August 23 letter, attempted to revive a defunct version of the permit in a move that contradicts state and federal precedent.

**Appealed Permit Allowing Unlawful Air Pollution in Southwestern PA.** In October, EIP and a coalition of environmental organizations appealed a decision by the Allegheny County Health Department to grant a permit for the construction of a new gas-fired power plant that would be a major source of air pollution affecting a number of southwestern Pennsylvania communities. The permit would allow the proposed 639-megawatt power plant to emit hundreds of tons of noxious pollutants and millions of tons of climate pollutants annually. The groups object to the permit because it would allow unlawfully high levels of air pollution in Pennsylvania communities that already suffer from some of the worst air quality in the United States.

# Chesapeake Bay and Factory Farms

**Demanded Stronger EPA Action to Enforce the Chesapeake Bay Cleanup.** In March, EIP and thirteen other environmental advocates sent a letter to the Biden Administration EPA demanding stronger EPA action to enforce the Chesapeake Bay cleanup, with more aggressive enforcement actions aimed in particular towards Pennsylvania and Maryland and their urban and suburban stormwater pollution.

**Forced Paper Mill Owner to Clean Up Black Sludge.** In April, the owners of a closed Luke paper mill in Western Maryland signed a consent decree with the Potomac Riverkeeper Network, represented by EIP, agreeing to clean up toxic pollution that has been seeping into the waterway and pay the state a \$650,000 penalty. The pollutants leaking into the river include “black liquor,” a caustic byproduct of the paper pulping process, as well as contaminants associated with coal ash waste.



*EIP and thirteen allied organizations sent a letter to the Biden Administration EPA demanding stronger EPA action to enforce the Chesapeake Bay cleanup.*

**Took Legal Action Over Harrisburg Sewage Overflows.** In May, EIP represented the Lower Susquehanna Riverkeeper Association in filing a complaint in federal court demanding that EPA and Pennsylvania end the state capital’s routine piping of millions of gallons of raw sewage and stormwater into the Chesapeake Bay’s biggest tributary. In December, A U.S. District Court Judge criticized the years of delays in efforts by Pennsylvania and EPA to stop chronic sewage overflows in the state capital and granted a motion by the Lower Susquehanna Riverkeeper to intervene in the case.

**Continued Monitoring Shenandoah Valley Bacteria Levels.** Almost three quarters of water quality monitoring sites in Virginia’s scenic Shenandoah Valley had levels of fecal bacteria last year that were so high that EPA would consider them unsafe for swimming, according to EIP’s May analysis of water quality monitoring data from the Virginia Department of Environmental Quality. Seventy-two percent (or 18 of 25) of monitoring sites along the Shenandoah Valley and its tributaries had levels of E. coli bacteria last year above EPA’s recommendations for swimming.

**Called Out Maryland Poultry Farms’ Poor Pollution Track Record and Regulators Failure to Act.** In October, EIP released two reports, “Blind Eye to Big Chicken” and “Stagnant Waters,” detailing how Maryland’s lack of enforcement of the poultry industry has had a damaging impact on the Eastern Shore’s waterways, where phosphorus pollution and algae levels have not improved over the last two decades. Eighty four percent of the 182 Maryland poultry operations inspected by the state between 2017 and 2020 had one or more violations of their state water pollution control permits. But only four facilities – or two percent of the total—paid penalties. More than half of the poultry farms for which



records were available in 2019 reported to the state that they spread manure on their crops in amounts greater than allowed under their nutrient management plans, which is illegal.



*EIP released two reports detailing how Maryland's lack of enforcement of the poultry industry has had a damaging impact on the Eastern Shore's waterways.*

**Detailed Failure of Virginia's Cleanup Plans for the Shenandoah River.** In August, EIP released the report, "Water Quality in the Shenandoah Valley: Virginia's Cleanup Plans Fail to Solve Bacteria Problem," showing that Virginia's efforts to restore the health of the scenic Shenandoah River are failing because of toothless and absent cleanup plans, a lack of regulations on the livestock industry, and inadequate monitoring. The report urges Virginia to take strong steps to protect people swimming in waterways contaminated with fecal bacteria, including by issuing health advisories and posting warning signs and by cracking down on manure runoff from livestock operations.

## Environmental Justice

**Continued Advocating for Action to Reduce Benzene Pollution into Vulnerable Communities.** In April, EIP released the report, "Environmental Justice and Refinery Pollution," showing that cancer-causing benzene from oil refineries escaping into mostly minority and lower income neighborhoods exceeded the federal action level for thirteen refineries across the U.S. in 2020. More than 530,000 people live within three miles of the thirteen refineries in 2020, with 57 percent being people of color and 43 percent living below the poverty line.

**Determined that Maryland's Landfills Release Four Times More Methane and Carbon Dioxide than State Estimates.** EIP's June report, "Greenhouse Gases from Maryland's Landfills: Underestimated and Under Regulated," concluded that Maryland's municipal waste landfills release four times more methane and carbon dioxide than the state's previous estimates, contributing as much greenhouse gas pollution as almost a million cars driving for a year.

**Took Legal Action Against PA Food Company for Clean Water Violations.** In June, EIP, on behalf of the Lower Susquehanna Riverkeeper Association, filed a Notice of Intent to Sue a Pennsylvania food processing plant for significant and ongoing violations of federal and state clean water laws. The Hanover Foods facility in York County, PA, an hour south of Harrisburg, is routinely and illegally discharging pollutants into nearby waterways and failing to comply with pollution monitoring and reporting requirements, in violation of both the federal Clean Water Act and Pennsylvania's Clean Streams Law, as well as its clean water permits.

**Filed Federal Lawsuit to Halt Decades of Violations by Virginia's Henrico Sewage System.** In December, EIP and two other environmental organizations filed a federal

lawsuit to halt decades of water pollution violations by Henrico County's sewage treatment plant and sewage collection system, including the release of more than 66 million gallons of raw sewage into the James River in the last five years alone. This creates a public health hazard for the many people who fish, swim, paddle, and enjoy time along the James River and its tributary streams.

## Texas

**Sued EPA for Allowing Texas to Approve Weak Air Pollution Control Permits.** EIP and three other groups sued EPA in January 2021 for the agency's failure to prevent Texas from issuing air pollution control permits that violate the law by failing to protect public health and by not requiring needed emissions monitoring. Texas issued these weak permits to eight of the largest polluters in the state, including a refinery, chemical factory, and oil and gas processing plant south and east of Houston, in an area that EPA has determined is not meeting national air quality standards for smog.

**Revealed Extent of Toxic Formaldehyde Pollution in Houston.** In July, EIP released a report with the Houston Health Department showing that air pollution levels of formaldehyde, a known carcinogen, along the Houston Ship Channel, pose potential health risks to largely Hispanic and high-poverty neighborhoods. The analysis found that from September 27, 2019, to September 26, 2020, formaldehyde concentrations at three monitoring sites exceeded EPA's health screening level of 0.17 parts per billion, meaning that local residents faced an increased risk of cancer.



*EIP released a report showing that cancer-causing benzene from oil refineries escaping into mostly minority and lower income neighborhoods exceeded the federal action level for 13 refineries across the U.S. in 2020.*

**Analyzed Texas's Industrial "Upset" Emissions During COVID.** In October, EIP co-released the report, "Illegal Air Pollution in Texas in 2020," which found that Texas industries reported 46 million pounds of illegal air pollution in 2020, a decrease of 54 percent from 2019 driven by the COVID-19 economic downturn. 2020 emissions during industrial accidents, shutdowns, and other "upset" events were about a third lower than the 72-million-pound average over the previous five years. However, the decline will be short-lived as the economy improves, unless the state increases penalties for illegal emissions and closes regulatory loopholes.

## Wood Biomass

**Petitioned EPA to Revoke Georgia Wood Pellet Plant Permit.** In March, EIP and eight other organizations and concerned citizens petitioned the U.S. EPA to revoke an air

pollution permit for a proposed wood pellet manufacturing plant in Adel, Georgia, and to order the state to correct its practice of issuing certain air pollution permits without the opportunity for public review. Under Georgia's Clean Air Act program, the public has the right to comment on draft air permits for proposed new and modified air pollution sources in their communities, even if such sources are classified as "minor," as is the case with Renewable Biomass Group's Adel wood pellet plant.

## Thanks to Our Supporters

We could not have achieved the many successes in 2021 outlined in these pages if it were not for the generous support of our donors and philanthropic organizations. The support of our friends and allies allowed the Environmental Integrity Project to expand our programs and increase our impact in 2021, and to further advocate for fair and effective enforcement of environmental law. While it has been a breath of fresh air to move on from the Trump Administration's EPA, there is no shortage of work to be done in the pursuit of these objectives under the Biden Administration and in states and communities across the country.

The support we receive allows us to keep growing our work to protect human health and the natural world, and we are grateful for every contribution.

Thank you again for making our work possible, and please don't hesitate to check out our website at [www.environmentalintegrity.org](http://www.environmentalintegrity.org), our Facebook page at <https://www.facebook.com/EnvIntegrity>, and our Twitter presence at <https://twitter.com/EnviroIntegrity> for more information.

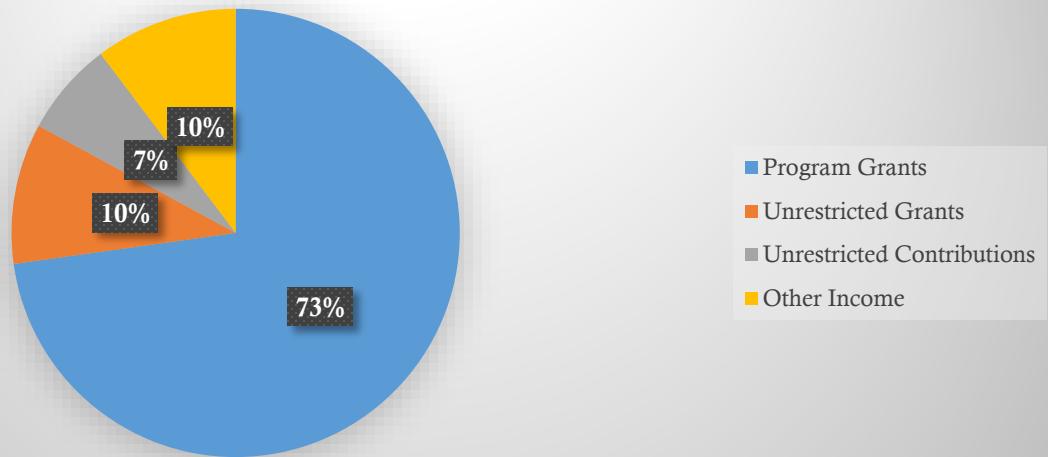
# EIP Financial Snapshot, 2021

## Income and Expense Statement

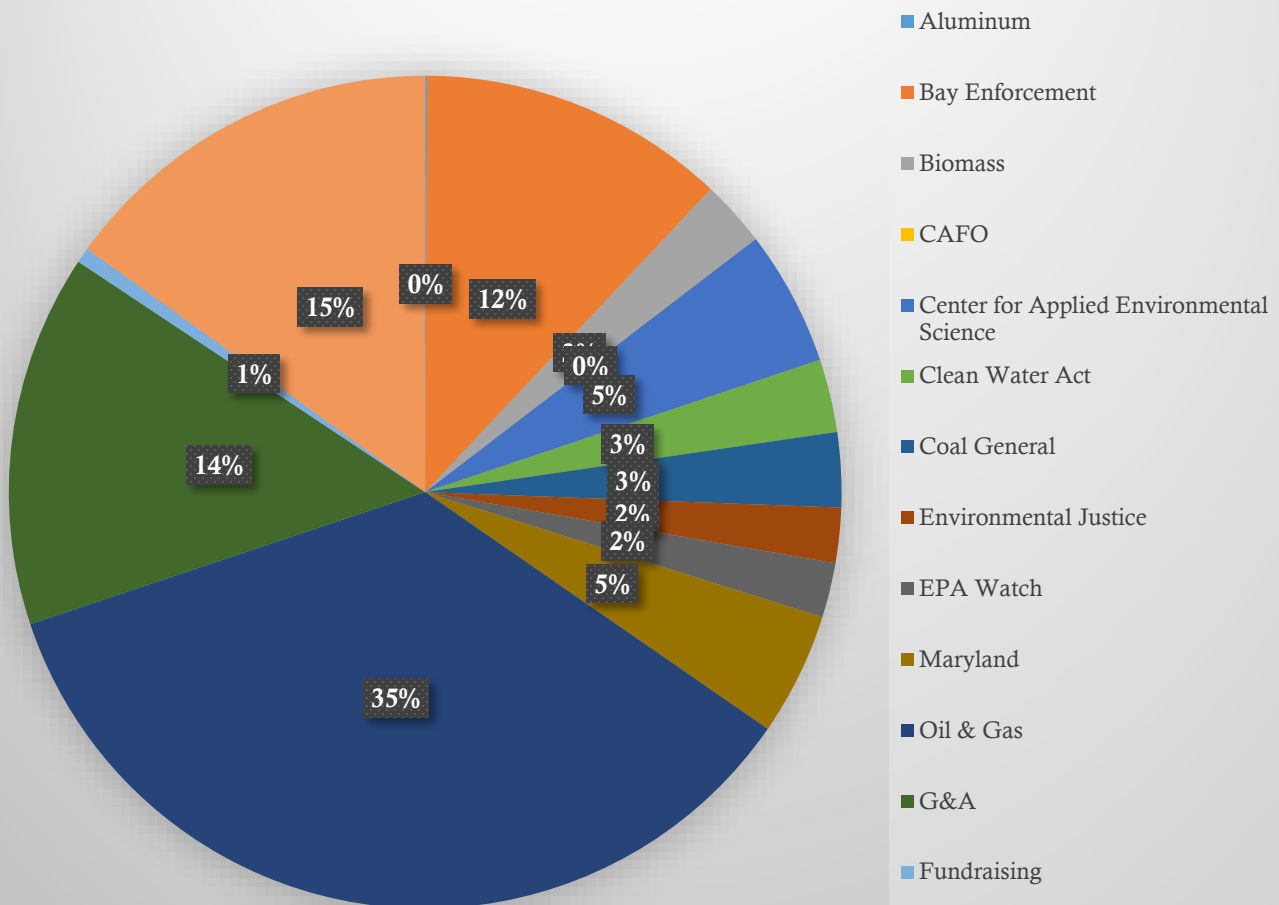
	<b>Total</b>
<b>Income</b>	
<b>Program Grants</b>	4,502,500.00
<b>Unrestricted Grants</b>	627,500.00
<b>Unrestricted Contributions</b>	419,976.00
<b>Other Income</b>	635,862.00
<b>Total Income</b>	<b>\$ 6,185,838.00</b>
<b>Expenses</b>	
<b>Payroll Expenses</b>	3,412,761.00
<b>Professional &amp; Legal Fees</b>	860,503.00
<b>Public Relations</b>	1,868.00
<b>Subgrants</b>	117,500.00
<b>Meeting &amp; Transport Costs</b>	6,723.00
<b>Other Direct Costs</b>	104,203.00
<b>Indirect Costs, (incl. Rent)</b>	544,668.00
<b>Total Expenses</b>	<b>\$ 5,048,226.00</b>
<b>Net Income</b>	<b>\$1,137,612.00</b>
<i>(unaudited)</i>	



## Income Sources, 2021



## Expenses by Program Areas, 2021



## Donors (at least \$50,000)

Anonymous (7)  
Abell Foundation  
Bloomberg Philanthropies  
Campbell Foundation  
Climate Imperative Foundation  
Colcom Foundation  
Cornell Douglas Foundation  
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Tilia Fund  
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Town Creek Foundation<sup>1</sup>

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Margaret Silva  
Margaret Silver and Jim Nicoll

Phaedra Tinder  
Melody Valdin  
Monica Werner  
Charlotte White

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<sup>1</sup> The Town Creek Foundation sunset in 2019 and continues to fund our activities through 2024.

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