



2024
ANNUAL REPORT

AMERICA'S ENVIRONMENTAL WATCHDOG



The Environmental Integrity Project

The Environmental Integrity Project is America's environmental watchdog. We are a nonprofit organization dedicated to protecting public health and our natural world by holding polluters and government agencies accountable under the law. We advocate for tough but fair environmental standards and empower communities fighting for clean air and clean water. For more information on EIP, visit: www.environmentalintegrity.org

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“In these challenging times, the Environmental Integrity Project is **committed to continuing our fight for clean air and water, healthy communities, and a livable climate in court and in the court of public opinion.** The fair and effective enforcement of our environmental laws is more important than ever. We will not be intimidated, and we will not surrender our communities and our planet for corporate profits.”

Jen Duggan

Executive Director
Environmental Integrity Project

This past year ushered in changes both for the United States and for the Environmental Integrity Project (EIP), with the election of Donald Trump signaling consequential policy shifts at the national level and a new generation of leadership at EIP stepping up to continue our fight for clean air and clean water. Our organization continued to stand strong as America’s environmental watchdog – keeping guard while changing the guard at EIP.

After founding the Environmental Integrity Project in 2002 and leading the organization for more than two decades, Eric Schaeffer retired in May 2024. Schaeffer, a former EPA Director of Civil Enforcement, built EIP into a respected national organization with strong local ties to communities on the frontlines of industrial pollution, dedicated to protecting public health and our natural world by holding polluters and government agencies accountable under the law. Schaeffer passed the torch to Jen Duggan, a veteran environmental attorney who served as Deputy Director and Managing Attorney at EIP before becoming Executive Director.

Under Duggan’s experienced leadership, EIP is ready to confront the Trump Administration’s efforts to give polluters a free pass by stripping away environmental protections and incapacitating EPA and other federal agencies. Trump’s second administration is determined to roll back climate and pollution regulations that save American lives, shut down environmental justice programs that provide protections for communities most at risk, and weaken environmental enforcement programs that hold corporations accountable for breaking the law. All of this would mean a financial windfall for the oil and gas industry, chemical manufacturers and other big polluters who have profited by using our public resources as their own private dumping grounds. We will use every tool we have – including litigation, advocacy, and hard hitting investigate reports – to fight back against the Trump Administration’s efforts to take away the right of all Americans to have access to safe and healthy air and water.

For more than two decades, no matter who is in the White House, EIP has kept a close eye on EPA to make sure it does its job to enforce the nation’s environmental laws and protect public health, and this past year was no different. Among many other actions, we litigated our case against EPA for their longstanding failure to make the petrochemical industry use modern wastewater pollution controls to limit the discharge of harmful nutrients and toxic pollutants into our rivers, lakes, and streams. We also sued EPA last year for inadequately protecting communities from toxic air pollution from chemical manufacturers.

This past year we also released ground-breaking reports on toxic pollution from plastics manufacturing plants, biofuels factories, and oil refineries. Our report, “Feeding the Plastics Industrial Complex,” found that 64 percent of the plastics plants built or expanded since 2012 have received public subsidies that totaled more than \$9 billion. But 84 percent of these projects violated their pollution control permits, including by releasing benzene, a carcinogen, into nearby communities. News outlets published more than 300 reports about our investigation, which helps increase pressure on regulators to crack down on these abuses.

The following sections provide a snapshot of our 2024 accomplishments, which could not be achieved without the help of our many national and local partners and generous donors.



CLEAN AIR & HEALTHY CLIMATE

Marathon Galveston Bay Refinery. Photo by Garth Lenz/Flight SouthWings.

Filed Civil Rights Complaint Over Trash Incinerator Pollution Threats on Behalf of South Baltimore Advocates

In the fight for environmental justice and cleaner air and water, EIP and advocates from South Baltimore filed a [federal civil rights complaint with EPA](#) on behalf of people suffering from pollution from Maryland's largest trash incinerator. [The complaint](#) states that the Baltimore Department of Public Works (DPW) failed to adequately plan a transition away from reliance on the highly polluting municipal waste incinerator called the Baltimore Refuse Energy Systems Company (BRESKO). Located in one of Baltimore's most disadvantaged communities, the BRESKO incinerator is the largest stationary source of industrial air pollution in Baltimore.

Petitioned Pennsylvania to Require Minimum Setbacks from Fracking Wells to Protect Pennsylvanians

EIP and our partners filed a [rulemaking petition](#) with the PA Environmental Quality Board asking it to increase minimum setback distances from fracking wells. Pennsylvania's current fracking well location requirements—which include a waivable 500-foot setback distance from buildings and a 1,000-foot setback distance from water supply extraction points—are woefully insufficient to protect public health and the environment from the numerous dangers of fracking.



U.S. Steel's Edgar Thomson facility in Pittsburgh, PA. Photo by Mark Dixon, Flickr

Persuaded EPA to Object to Weak Clean Air Act Operating Permits for Two Large U.S. Steel Plants

In response to EIP's petitions, EPA issued an order objecting to an illegal air quality permit issued by the Allegheny County Health Department to U.S. Steel for the Edgar Thomson facility and the Clairton Coke Works in the Monongahela Valley in western Pennsylvania. EIP and our partners argued that the Clean Air Act permit did not include sufficient monitoring and testing requirements to ensure compliance with air quality emissions for harmful pollutants. EPA agreed and ordered the health department to revise the permits.

Secured Deadlines for the Issuance of Long Overdue Air Pollution Permits for Two Chemical Plants

In response to an EIP lawsuit in state court, the Allegheny County Health Department agreed to a strict schedule to issue long-overdue Clean Air Act permits for the Neville and Synthomer chemical plants in western Pennsylvania. Despite being major sources of air pollution, the Synthomer plant had never been issued an operating permit, while the permit for the Neville Chemical facility had been expired for more than three years.

Sent Letter Urging U.S. Senators to Drop Efforts to Block New Rules to Reduce Benzene Emissions at Coke Oven Plants

Benzene is a well-known carcinogen that is toxic at very low concentrations. Air monitors installed within the boundaries of coke oven plants in Indiana, Pennsylvania, and Alabama recorded benzene levels from nearly two to over fourteen times the occupational exposure limit recommended by the American Council of Governmental Industrial Hygienists. The high levels of benzene are “exposing plant workers to unhealthy levels of a potent toxin that may also drift into downwind neighborhoods,” EIP and our partners wrote [in a letter](#) delivered to eight U.S. Senators who had earlier complained to EPA about the high cost of an EPA proposal to minimize emissions of benzene and other toxins from coke ovens.

Secured Final Rules Reducing Air Toxic Emissions from Cancer-Causing Chemical Plants

EPA released [a final rule](#) updating critical Clean Air Act standards that will reduce toxic emissions from more than 200 of the nation’s most hazardous chemical plants. The updates apply to facilities in the synthetic organic chemical manufacturing industry and polymers and resins manufacturing plants. They result from long-running advocacy by EIP and our partners to pass stronger rules to protect fence-line communities from harmful air pollution, including the carcinogens ethylene oxide and chloroprene. These standards will cover facilities across the nation, from Texas’s Gulf Coast and Louisiana’s Cancer Alley to West Virginia’s Chemical Valley. EIP and our partners filed for judicial review of the provisions of the rules that fail to adequately protect local communities from cancer-causing pollutants and to protect the rules from aggressive industry attacks.



Filed Lawsuit Against EPA Over Dangerous Air Pollution from Aluminum Plant in Upstate New York

EIP and our partners [filed a lawsuit](#) against EPA for failing to require the State of New York to create a plan, as required by law, to reduce dangerous air pollution from a 122-year-old Alcoa Massena aluminum smelting plant in upstate New York. The goal of the lawsuit is to cut sulfur dioxide emissions, which can cause lung damage and trigger asthma attacks, so that the state can meet federal air quality standards for the region. In response to our lawsuit, EPA issued a formal determination that New York failed to comply with the law and ordered the State to act or face sanctions.

Rules EIP Helped Secure Drove Down Cancer-Causing Benzene Pollution at U.S. Refinery Fencelines

EPA [regulations](#) requiring oil refineries to monitor and report benzene concentrations at their perimeters, which resulted from a lawsuit filed by EIP and its partners, came into effect in 2018. EIP continued to track their impact in 2024. The federal program mandating fenceline monitoring for the cancer causing pollutant and subsequent cleanup actions is working to reduce health risks to nearby communities. EIP reporting in 2024 revealed that, by the end of 2023, the number of U.S. oil refineries exceeding EPA's action level for benzene had decreased by half compared to 2020.

Filed Federal Lawsuit to Reduce Hazardous Air Pollution from Steel Industry Coke Oven Plants

EIP and our partners filed [a federal lawsuit](#) against EPA demanding stronger rules to reduce hazardous air pollution from steel industry coke oven plants across the country. Coke oven plants, located in Western Pennsylvania, Northern Indiana, Alabama and a dozen other locations in the U.S., superheat coal in a kiln without oxygen to produce a carbon-dense coal byproduct that is used in iron and steel manufacturing. Because these plants release large amounts of air pollution, EPA on July 5 [imposed new regulations](#) meant to control their hazardous emissions. But the regulations did not go far enough to control benzene, exposing communities downwind from coke oven plants to dangerous levels of this carcinogen.

CLEAN WATER



Took Legal Action Against Three Refinery Waste Processing Plants in Louisiana for Violating the Clean Water Act

EIP filed notices of intent to sue three petroleum waste processing plants in Louisiana for illegally discharging toxic water pollution including lead, mercury, vanadium, and polycyclic aromatic hydrocarbons into the Calcasieu River, the Mississippi River, and Big Bend Swamp. The facilities are the Rain CII Gramercy Coke Plant in Saint James Parish, the Rain CII Lake Charles Calcining Plant, and the Alcoa Reynolds Metals Lake Charles Carbon Plant.

Secured New Pollution Control Rules for Coal-Fired Power Plants

EIP and partner organizations litigated and advocated for years to strengthen water pollution rules, called “effluent limitation guidelines” and to eliminate a loophole in the cleanup regulations for coal ash dumps. In 2024, EPA issued new regulations for coal-fired power plants aimed at controlling polluted wastewater, groundwater contamination from coal ash dumps, greenhouse gas emissions and toxic air pollution, drawing praise from EIP.

Secured Proposed Federal Rules to Significantly Reduce Harmful Nutrient Pollution from Slaughterhouses

Slaughterhouses and meat processing plants are the largest industrial source of phosphorus and nitrogen pollution to America's waterways, feeding algal outbreaks and fish-killing "dead zones." In response to an EIP lawsuit, EPA published proposed rules that would require pollution reductions from slaughterhouses and meat processing plants that pipe their waste directly into U.S. rivers, lakes, and streams. The new rules, if adopted, will slash nine million pounds of nitrogen and eight million pounds of phosphorous pollution from the largest plants. But EPA's proposed rule largely failed to require controls for thousands of plants that send their effluent first to municipal sewage treatment plants, which are often overwhelmed and not equipped to treat industrial waste. EIP and our partners filed detailed legal and technical comments on the rule, supporting the rule's progress and urging EPA to do more to crack down on nutrient pollution from all facilities.

Intervened in Indiana Enforcement Action to Stop Aluminum Plant's Illegal Dumping of Heavy Metals in Ohio River

EIP and partner organizations litigated and advocated for EIP and our partners filed a motion to intervene in the State's lawsuit against the Alcoa Warrick aluminum smelting plant in Indiana for repeated violations of state and federal clean water laws. The State took enforcement action in response to an earlier notice of intent to sue in federal court filed by EIP. Our notice listed more than one hundred permit violations from the Warrick smelter in 2022 and 2023, including illegal discharges of mercury, aluminum, chlorine, copper, fluoride, nickel, and zinc into the Ohio River.

Took Legal Action for EPA's Failure to Release Required National Report on Water Quality

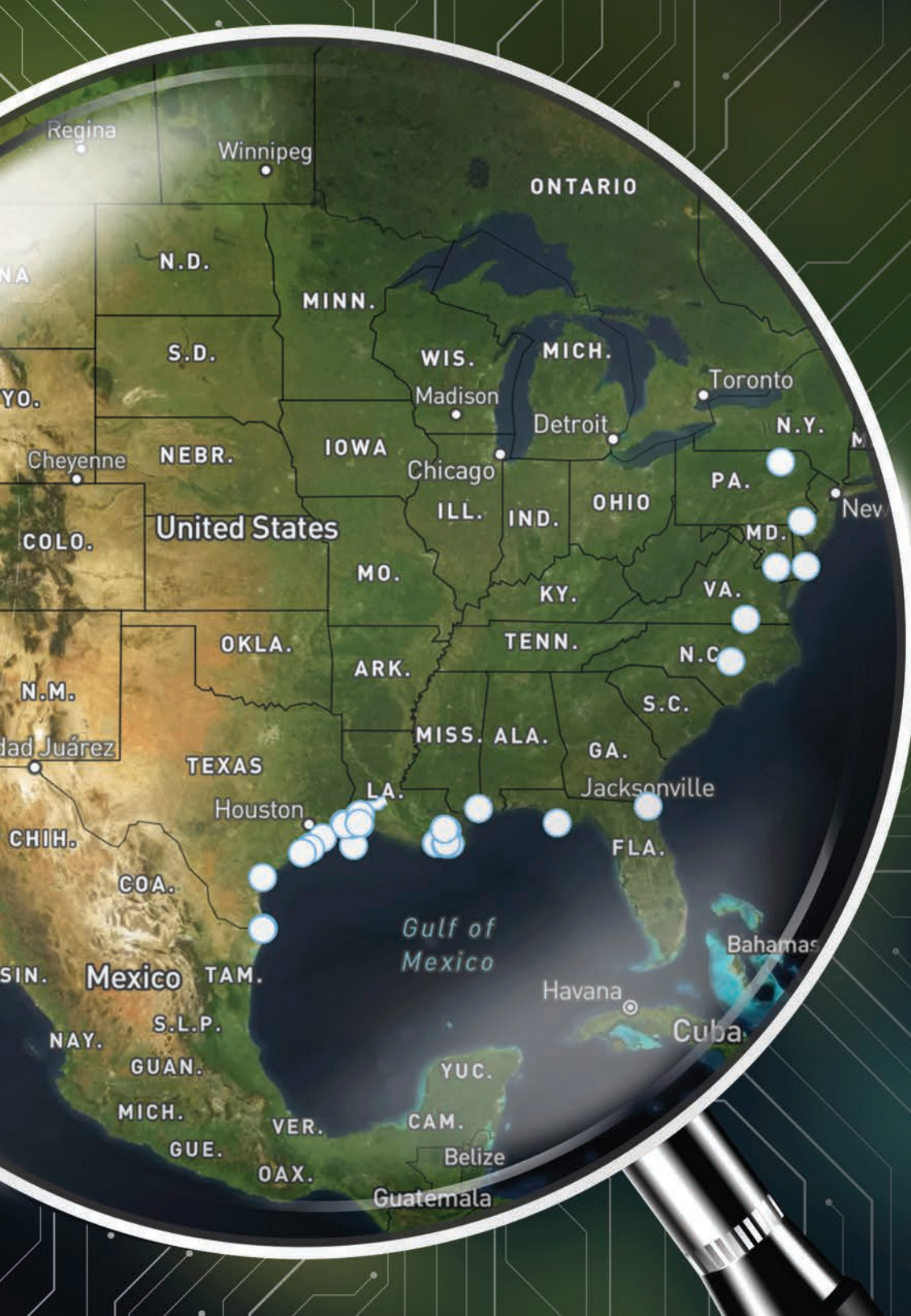
EIP and our partners sent EPA a [notice of intent to sue](#) the agency for its failure to implement a key requirement of the federal Clean Water Act: issuing national reports on water quality. The Act requires EPA to report on the condition of America's streams, rivers, lakes and estuaries every two years. But EPA's last national water quality report was released seven years ago, in 2017. EIP also organized a broader national coalition of more than 50 clean water organizations to [send a letter to EPA Administrator Michael Regan](#) urging the agency to fix two other major problems: Failing, for decades in some cases, to update and strengthen technology-based standards for industry water pollution control systems; and not identifying the funding needed to fulfill EPA's Clean Water Act responsibilities.

Petitioned EPA to Set National Water Pollution Standards for Refinery Waste Processing Plants

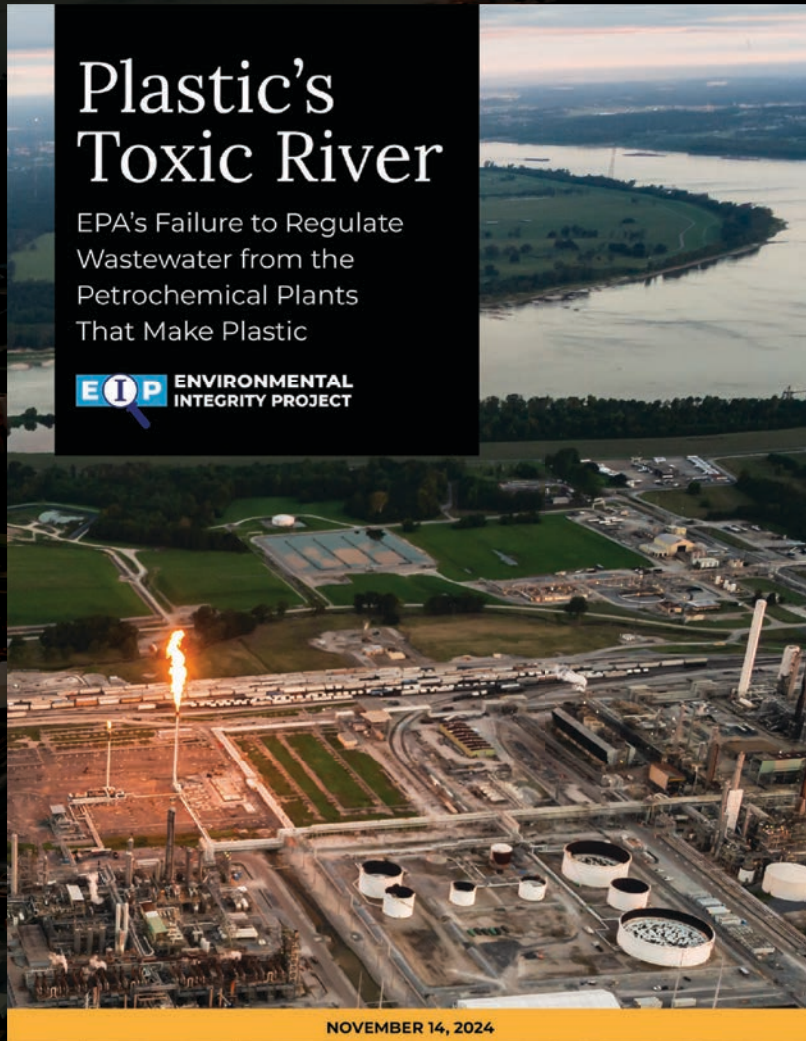
EIP and our partners filed a petition with EPA demanding national water pollution standards for petcoke processing plants. There are 13 petcoke processing plants across the U.S., seven in Louisiana and two in Texas. The plants were built between 1935 and 1983, lack modern air and water pollution controls, and are among the leading sources of air and water pollution in their regions. Many are located in communities that are disproportionately low-income or people of color. EPA never established national water pollution limits (effluent limitation guidelines) for the industry, and states have not filled in the gap. The result is extremely weak permits that do not limit toxic pollution from the plants nor protect waterways or the people that use them.

Petitioned Commonwealth of Pennsylvania to Reduce Water Pollution from Shell Chemical Plant

EIP and our partners filed a [petition](#) asking the Pennsylvania Department of Environmental Protection to strengthen the water discharge permit for the Shell Monaca chemical plant in Beaver County, PA, to improve oversight and reduce water pollution. For years, chemicals have leaked from the plant, located northwest of Pittsburgh, into nearby rivers and lands, including the Ohio River, which supplies drinking water to millions of people. The roughly \$6 billion plant transforms a product of natural gas (ethane), extracted through hydraulic fracturing in the region's shale formations, into tiny plastic pellets used to manufacture single-use plastic goods like soda bottles and plastic packaging.

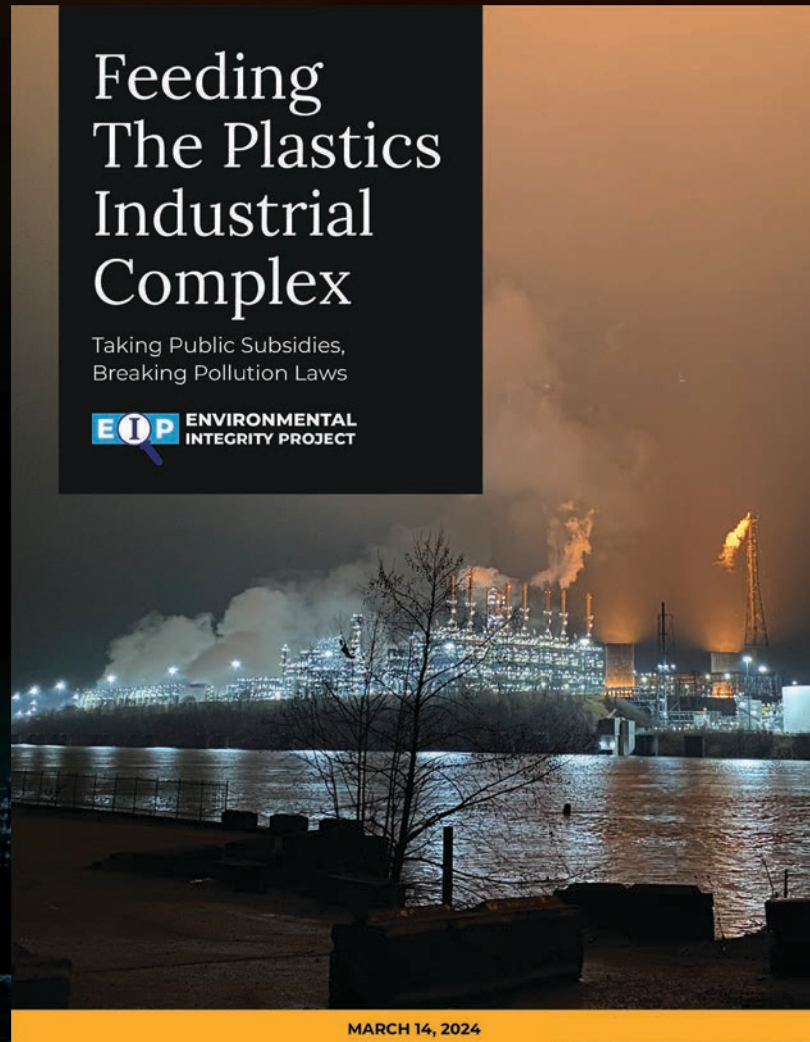


**DATA
ANALYSIS
THAT
DRIVES
ACTION**



Released Report Documenting Toxic and Harmful Nutrient Pollution from Plastics Plants

The plastics manufacturing industry dumps almost a half billion gallons of wastewater per day into U.S. waterways, and a failure of EPA oversight means that most plants have no limits on the amounts of nitrogen, phosphorus, 1,4-dioxane, dioxins, and other harmful pollutants they are allowed to release. EIP's report, [Plastic's Toxic River: EPA's Failure to Regulate the Petrochemical Plants that Make Plastic](#), examined the permits and records of 70 U.S. facilities that make plastics or the main chemical ingredients in plastics and found they discharged almost 12 million pounds last year of total nitrogen and phosphorus, which can cause fish-killing "dead zones." All but one of these plants had no limits in their permits for discharging these nutrients into waterways. More than two thirds of this pollution was released by facilities in communities of color. The report generated 32 news stories, including on Houston Public Media and in the Houston Chronicle, Louisiana Advocate, Charleston (WV) Gazette and The State newspaper in South Carolina.



Released Report Documenting the Billions of Dollars in Taxpayer Subsidies to Plastics Plants that Pollute the Air in Communities of Color

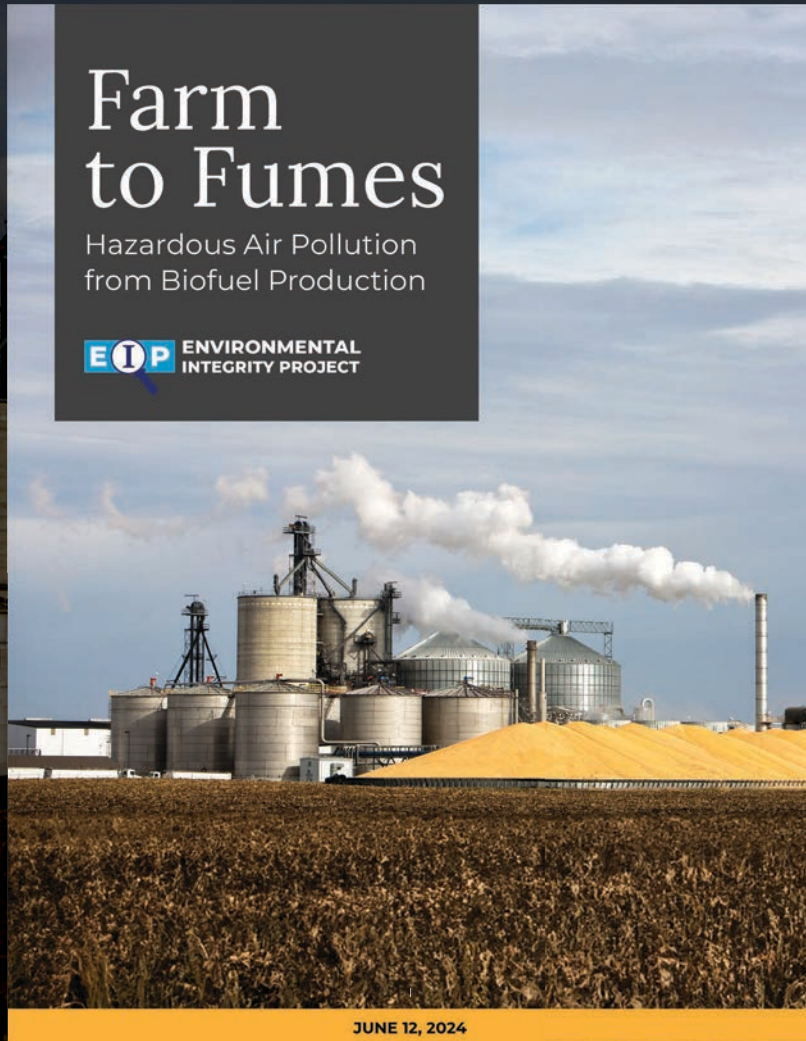
Billions of taxpayer dollars in the U.S. are helping to pay for dangerous—and often illegal—air pollution from a rapidly-growing plastics industry. The pollution disproportionately threatens Black and Latino communities that live beside plastic manufacturing plants, according to EIP's analysis. Our report, "[Feeding the Plastics Industrial Complex](#)," examined 50 plants that were built or expanded in the U.S. since 2012, 32 of which received a total of almost \$9 billion in state and local subsidies. Of the more than 591,000 people who live within three miles of the plants, two-thirds are people of color.

EIP's investigation found an alarming pattern: companies that manufacture plastics and their main chemical ingredients receive tax breaks and government subsidies and—to win that taxpayer support—often make public promises to protect health and the environment. But once the subsidies and building permits are in hand, they fail to keep their promises by repeatedly releasing illegal pollution. They seldom face penalties and never have their public subsidies revoked, no matter how frequent their environmental permit violations.

The report was featured in 343 news stories across the country, including on NPR and in the Houston Chronicle and New Orleans Times-Picayune — with all the media coverage putting pressure on officials more carefully scrutinize public subsidies and crack down on illegal pollution.

Released Analysis Documenting Which States are Failing to Protect Wetlands in the Wake of U.S. Supreme Court Decision

In *Sackett v. EPA*, the US Supreme Court limited federal Clean Water Act authority to protect wetlands. On the one-year anniversary of the decision, EIP released a [report](#) highlighting that the 24 states that joined West Virginia's brief supporting these limits are the least likely to protect wetlands that are now exempt from the Clean Water Act. This is despite claiming in their brief that states have not hesitated to “flex their authority” to protect these critical natural resources.



Released Report Documenting Large Amounts of Hazardous Air Pollutants from Biofuels Manufacturing Plants

While government policies support the biofuels industry, our report, "[Farm to Fumes: Hazardous Air Pollution from Biofuel Production](#)" underscored that biofuel plants frequently violate their air pollution control permits. Although the rapidly-growing biofuel industry portrays itself as a climate-friendly and clean alternative to petroleum-based fuels, biofuel manufacturing plants release almost as much hazardous air pollution as oil refineries – and more of some dangerous pollutants, according to our analysis. These pollutants from ethanol, biodiesel and “renewable diesel” manufacturing plants include large quantities of greenhouse gases along with carcinogens, probable carcinogens, toxins, and strong irritants such as formaldehyde, acetaldehyde, hexane, and acrolein. The result of these hazardous emissions is that some rural Midwestern communities suffer from unhealthy air quality despite having no significant pollution sources around them—other than the smokestacks of ethanol refineries.

The Long Shadow of Oil Refinery Waste

Petroleum Coke's Polluting Role in U.S. Industry



JULY 25, 2024

Released Report Documenting How Petroleum Refinery Waste is Processed Without Pollution Controls in Disadvantaged Communities

The use of an oil refinery waste product, petroleum coke, as an ingredient in metals and other products releases large amounts of health-damaging air pollutants, often in disadvantaged communities. Our analysis in [“The Long Shadow of Oil Refinery Waste: Petroleum Coke’s Polluting Role in U.S. Industry”](#) found that the advanced age of the plants and EPA’s failure to regulate the petcoke processing industry has helped them evade key provisions of the Clean Air and Clean Water acts and to operate with weak pollution limits. Petcoke processing facilities reported emitting at least 230,408 pounds of hydrochloric acid, 56,588 tons of sulfur dioxide, and 1,048 tons of particulate matter (PM2.5) in 2022 (the most recent data). Most of the plants rank as the number one source of sulfur dioxide and particulate matter in the county or parish where they are located, according to EIP’s research.

A map of the United States with numerous green location pins, each containing a black factory icon, representing benzene emissions from refineries and chemical plants. The pins are distributed across the country, with a higher concentration in the Midwest and Northeast. Two pins in Texas are highlighted in red. The map includes labels for various states and provinces, such as Manitoba, Saskatchewan, Ontario, Minnesota, Wisconsin, Illinois, Indiana, Michigan, Ohio, Pennsylvania, New York, New Jersey, Delaware, Maryland, Virginia, North Carolina, South Carolina, Georgia, Florida, Alabama, Mississippi, Louisiana, Texas, New Mexico, Arizona, California, Nevada, Idaho, Utah, Colorado, Wyoming, Montana, North Dakota, South Dakota, Nebraska, Kansas, Oklahoma, and Texas. It also shows the Gulf of Mexico and parts of Mexico and Cuba.

DATA ANALYSIS THAT DRIVES ACTION

Released Public Dashboard that Tracks Fenceline Benzene Emissions at Refineries and Chemical Plants

In May 2024, EIP launched a new [dashboard](#) that visualizes fenceline monitoring data around 21 chemical plants and 115 oil refineries. Benzene monitoring and cleanup has led to a decline in benzene levels around many refineries in the US. However, some refineries and chemical plants still need to do more to reduce leaks and malfunctions at their facilities. Similar monitoring included in EPA's final rule for chemical plants is expected to reduce leaks and malfunction emissions at chemical plants subject to the rule.



OIL & GAS WATCH
ENVIRONMENTAL INTEGRITY PROJECT

Enhanced Access to Public Information About New and Expanding Projects through Oil & Gas Watch, Oil & Gas Watch News, and Comprehensive Reports

In 2024, EIP's [Oil & Gas Watch News database](#), which tracks and provides public records for hundreds of proposed oil, gas, petrochemical, and pipeline projects across the country, experienced significant growth. We grew the Oil & Gas Watch audience to 52,000 total users of the site over the past year, compared to 13,000 users in the previous year (its first year). EIP also launched an updated and improved version of the database, which features a new “alerts” function to quickly inform environmental activists, community groups, attorneys, journalists, and others about new projects. In addition to projected greenhouse gas impacts of projects, the site now includes GHG equivalencies for vehicles driven and coal-fired power plants, and the estimated climate-related social costs and health impacts from this rapidly growing industry. The new database site has sharable summary information pages for industries such as liquefied natural gas, plastics, carbon capture, hydrogen, ammonia, and petrochemicals, among other sectors.

EMPOWERING COMMUNITIES FIGHTING FOR CLEAN AIR & WATER





Over the past year EIP's Center for Applied Environmental Science (or "CAES") has coordinated expert consulting assistance or provided direct assistance to more than 30 communities impacted by industrial pollution. Over 80 percent of our consulting budget went to communities confronting expansions in the oil, gas, or petrochemical sectors. Sixty-four percent of our consulting budget went to low-income communities and communities of color, and another 23 percent of our budget went to projects that are national or regional in scope (e.g., carbon dioxide pipelines and national and state-level rulemaking).

In addition to helping communities develop expert projects and funding those consulting contracts, EIP staff provided direct assistance to support community monitoring projects in Texas, Louisiana, and Pennsylvania.

This report includes highlights of our consulting support in 2024.



ALABAMA

Occidental Chemical brine sludge lagoon

CAES retained a chemical engineer to work with the Mobile Environmental Justice Action Coalition to evaluate a proposed hazardous waste permit for a facility that is discharging mercury into impaired Chickasaw Creek in Africatown, Alabama.

ALASKA

Manh Choh mine

An acoustic engineer assisted the Native Village of Dot Lake in Alaska in their efforts to protect themselves from noise and other impacts of a nearby gold and silver mine.

BRITISH COLUMBIA **Teck Coal mine**

CAES supported an expert assessment of the costs of selenium remediation at the Teck Coal metallurgical coal mine. The work was done on behalf of Wildsight, a Canadian conservation organization concerned about the potential absence of financial assurances, and consequently the threat of unremediated selenium contamination, in the event that the mine is sold.

CALIFORNIA **Elk Hills CCS**

A research scientist and engineer worked with the Center for Biological Diversity to analyze permits and California Environmental Quality Act reviews for a specific Carbon Capture and Sequestration project in a California oil field that is vulnerable to carbon dioxide leakage due to numerous abandoned oil and gas wells and nearby faults.

CALIFORNIA **Low-Carbon Fuel Standard**

CAES retained the services of an economist on behalf of the Leadership Council for Justice & Accountability, to critique the state's economic analysis of a plan that currently has the potential to incentivize the confinement of animals to generate methane for sale into the carbon credit market.



CALIFORNIA **Santa Ynez oil**

CAES retained an engineer on behalf of the Center for Biological Diversity to help the Center prepare comments on a Title V permit renewal for the Las Flores Canyon Santa Ynez Unit, which involves three offshore oil platforms and an onshore oil and gas processing unit.

COLORADO **Lowry Ranch oil and gas fracking**

Working with Save the Aurora Reservoir, CAES retained the assistance of a hydrogeologist, a chemical engineer, and an acoustic engineer to critically evaluate a 166-well Comprehensive Area Plan (CAP) for fracking in Arapahoe County, Colorado; individual well pad applications within the CAP; and state rulemaking related to the cumulative impacts of oil and gas development.

INDIANA **Fulcrum Biorefinery**

CAES supported an engineer's work with Gary Advocates for Responsible Development in opposition to a proposed plastic-to-jet fuel facility in Gary. The proponent of the project abandoned its plans and filed for bankruptcy in late 2024.



CENTER FOR APPLIED ENVIRONMENTAL SCIENCE

LOUISIANA

Air Monitoring in New Orleans

CAES staff engineers worked with JOIN for Clean Air to install and operate a regulatory-grade air monitor to measure PM2.5 concentrations in the Irish Channel neighborhood of New Orleans. The Federal Equivalent Method air monitoring equipment will provide NAAQS-comparable air quality data in real time to community members, officials, and regulators in support of JOIN's campaign to reduce emissions and odors from nearby oil, gas, and petrochemical facilities.

LOUISIANA

Air Monitoring in Waggaman

CAES staff engineers worked with the Harahan/River Ridge Air Quality Group and community members impacted by severe odors from adjacent landfills and chemical manufacturing. CAES staff and community members collected air samples with summa canisters and found elevated concentrations of hydrogen sulfide and benzene near the landfill fenceline.

LOUISIANA

Ethylene manufacturing facility

CAES worked with Micah 6:8 Mission and a wastewater expert to review a discharge permit for the Indorama Ventures Olefins manufacturing plant in Lake Charles.



LOUISIANA

Westlake chemical plant in Lake Charles

Micah 6:8 Mission worked with two engineers to review a proposed hazardous waste permit modification associated with the owner's plans to expand chemical manufacturing and hazardous waste storage at the facility.

LOUISIANA

Petrochemical terminal air emissions

An engineer worked with JOIN for Clean Air to review and prepare comments on air permits for two neighboring petrochemical terminals in Harvey and Gretna.

LOUISIANA

Methane gas facility

CAES worked with an engineer and the Louisiana Bucket Brigade to challenge a facility proposing to produce so-called "blue" hydrogen and ammonia and sequester carbon dioxide pollution beneath Lake Maurepas in Ascension Parish.



LOUISIANA

Lake Charles Methanol

CAES supported an engineer's work on behalf of Micah 6:8 Mission in opposition to a proposed natural gas-to-methanol plant near the Port of Lake Charles. The engineer critiqued the owner's estimates of NOx, VOC, and methanol emissions.

LOUISIANA

SASOL petrochemical plant

CAES worked with a local expert and realtor to give SASOL neighbors in Mossville, Louisiana estimates of fair market value that the residents could use in negotiating potential buyouts from SASOL.

LOUISIANA

St. Charles Blue Ammonia

The Tulane Environmental Law Clinic worked with an engineer to evaluate air permits for the St. Charles Clean Fuels blue ammonia facility in St. Rose.



MINNESOTA

Enbridge oil pipeline impacts

CAES has been working with Waadookaand Amikwag and a team of experts to evaluate aquifer breaches and frac-outs from the Enbridge Line 3 oil pipeline in Minnesota.

MISSISSIPPI

One Lake Plan

A floodplain manager and GIS analyst worked with Mississippi Communities United for Prosperity to review U.S. Army Corps flood mitigation plans, including a Draft Environmental Impact Statement, for areas in and downstream of Jackson. The project is known as the Pearl River Flood Risk Management Project and also known as the One Lake Plan.

NORTH CAROLINA

New LNG storage

A CAES engineer worked with Neighbors Opposed to Moriah Energy Center to critique draft air permits for a proposed LNG storage facility in Person County.



PENNSYLVANIA

Air monitoring in Pitcairn

CAES staff engineers worked with Protect PT and community members impacted by severe odors from the adjacent landfill. The team collected air samples in summa canisters during odor events to evaluate the presence of VOCs and sulfur compounds in landfill gas and the ambient air.

PENNSYLVANIA

Noise impacts from natural gas cryogenic plants

An acoustic engineer is helping residents of Smith Township, Washington County, assess baseline noise levels and advocate for health-protective noise and vibration ordinances.

PENNSYLVANIA

Coal mine expansion

CAES provided funding to the Mountain Watershed Association for two expert consultants to evaluate groundwater, surface water, and other ecological impacts of proposed coal mine expansions in Fayette and Westmoreland Counties.



PENNSYLVANIA

Guardian Compressor Station

CAES retained an environmental scientist to work with Protect PT, a group fighting oil and gas buildout in the Penn-Trafford region of Westmoreland County, in their efforts to stop a new compressor station. Our expert recently testified before the Penn Township Zoning Hearing Board about likely air and groundwater impacts.

PENNSYLVANIA

Unconventional oil and gas wells in Indiana Township

CAES is supporting an acoustic engineer as they help residents of Indiana Township establish baseline noise levels and estimate the potential noise impacts associated with proposed well pads.

PENNSYLVANIA

Wastewater treatment plant in Harrisburg

CAES is working with the Lower Susquehanna Riverkeeper and two experts – a wastewater engineer and economist– to evaluate Capital Region Water’s analysis of alternatives and financial capability assessments, all in the context of multi-party litigation over ongoing problems with the district’s combined sewer overflows.



PUERTO RICO
New Fortress LNG

CAES is working with multiple experts and El Puente de Williamsburg Latino Climate Action Network, to assess the environmental impacts and blast threats from New Fortress Energy's LNG import facilities at the Port of San Juan. We are also working with a videographer to create an educational video related to the expert work.

TEXAS
Community monitoring of drinking water

A researcher from the University of Texas at Austin has developed a drinking water monitoring project for the residents of Toyah, Texas. The researcher is now working with citizen scientists on sample collection and analysis of the sampling results.

TEXAS
Oilfield waste disposal rulemaking

CAES retained an engineer to help Commission Shift evaluate draft oilfield waste pit rules from the Texas Railroad Commission.



TEXAS

Air quality in San Patricio County

CAES supported an air quality monitoring program led by EIP engineer Sara Brodzinsky, who was working with Ingleside on the Bay Coastal Watch Association. In response to high total VOC readings, we measured individual VOCs in multiple locations. The results will provide a baseline against which to evaluate spikes in poor air quality associated with the many new and proposed VOC-emitting facilities in the area.

VIRGINIA

Virginia Electric Power Integrated Resource Plan

CAES worked with Appalachian Mountain Advocates and an economist to critique and testify against Virginia Electric Power's IRP.

WASHINGTON, D.C.

National Engineering Products

On behalf of Empower DC, CAES retained Downstream Strategies to sample soil for organic contaminants, including formaldehyde, that are known to be emitted by a military sealant manufacturer located in a residential neighborhood in Northeast Washington, DC and currently operating without an air permit. CAES staff also recruited a class of local teenagers to participate in the sampling trip, and CAES staff are currently working with a coalition of legal and scientific experts to push for emissions to be reduced or eliminated.

WEST VIRGINIA

Mace experimental mine

On behalf of Eight Rivers Council, CAES is working with two local experts to develop and implement a water quality monitoring plan near an experimental mine safety research facility in Mace, West Virginia.

WISCONSIN

Enbridge pipeline

CAES is working with Midwest Environmental Advocates and a geologist to review a draft Army Corp Environmental Assessment for a reroute of the Enbridge Line 5 pipeline around the Bad River Reservation in Wisconsin.

NATIONAL

CO₂ pipelines

We are working with Synapse Energy to help the Pipeline Safety Trust evaluate the economic assumptions underlying PHMSA's forthcoming carbon dioxide pipeline safety rule.

NATIONAL

Abandoned wells near carbon capture and sequestration sites

A senior research scientist completed their report on the risks of leakage of carbon dioxide from carbon sequestration sites through overlying abandoned wells.

NATIONAL

Volatile organic liquid storage vessels

An engineer worked with EIP attorneys to critique proposed New Source Performance Standards for volatile organic liquid storage vessels.

INTERSTATE

Duke Energy Integrated Resource Plan

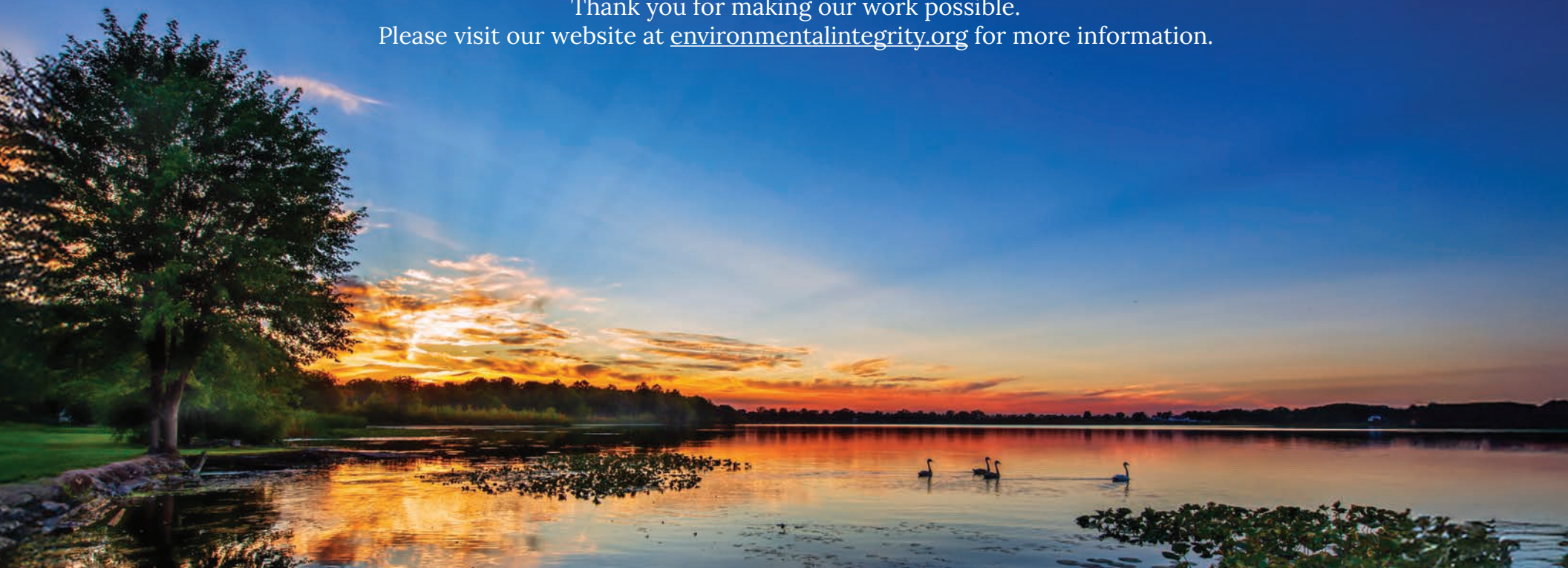
Appalachian Voices worked with environmental scientists to critique Duke's IRP and make the case for fewer fossil fuels and more renewables in Duke's portfolio.

THANK YOU TO OUR SUPPORTERS

The support of our friends and allies allowed the Environmental Integrity Project to increase our impact and expand our programs for clean air and clean water, government accountability, and community empowerment in 2024.

The support we receive allows EIP to provide communities with the legal and technical resources they need to claim their rights under our environmental laws and protect human health and the natural world. We are grateful for every contribution.

Thank you for making our work possible.
Please visit our website at environmentalintegrity.org for more information.

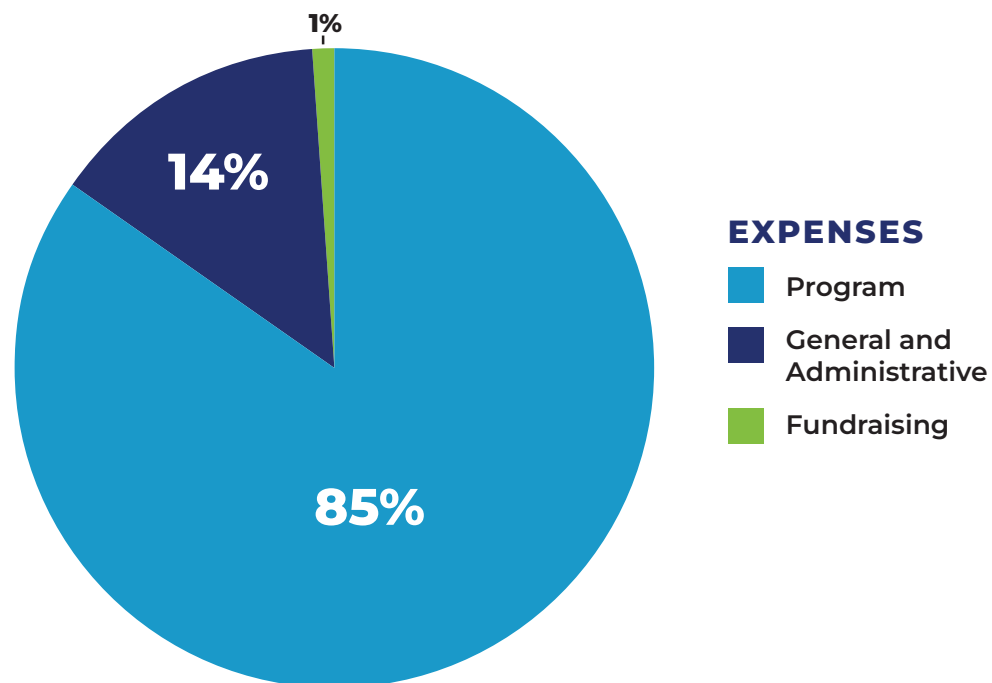
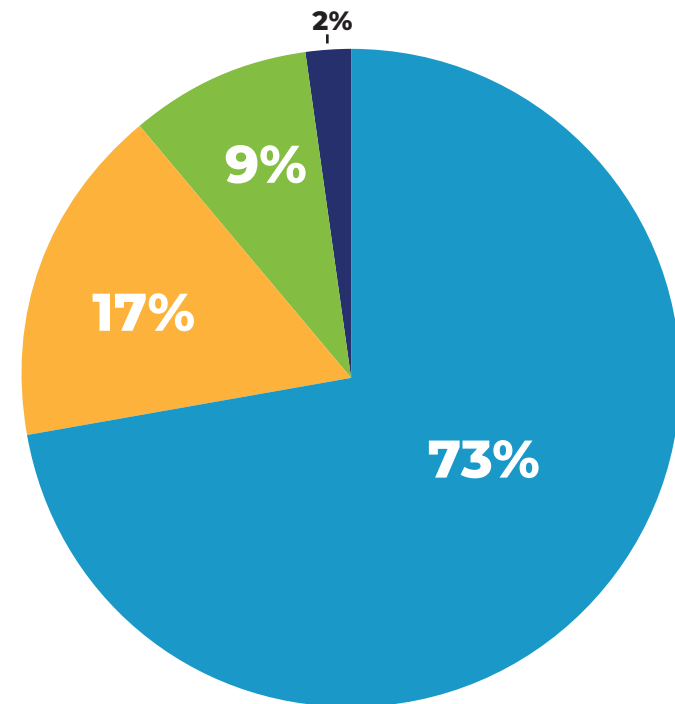
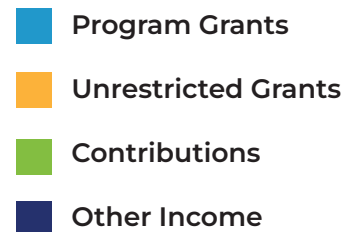


2024 FINANCIAL SNAPSHOT

INCOME	
Program Grants (Restricted)	\$5,008,708
Unrestricted Grants	\$1,140,108
Contributions	\$604,237
Other Income	\$110,575
Total Income	\$6,863,628
EXPENSES	
Program Expenses	\$5,681,946
General and Administrative Expenses	\$971,766
Fundraising Expenses	\$74,008
Total Expenses	\$6,727,720
Net Surplus / (Deficit)	\$135,908
NET ASSETS	
Beginning of Year	\$3,748,583
End of Year	\$3,884,491

Note: Figures are unaudited and subject to change upon completion of the audit process.

INCOME



EIP FUNDING PARTNERS

Anonymous (multiple)
Abell Foundation
Bancroft Foundation
Beyond Petrochemicals
Jacob and Hilda Blaustein Foundation
Bunting Family Foundation
Campbell Foundation
Marguerite Casey Foundation
Chiltepin Charitable Fund
Climate Imperative Foundation
Community Foundation for the Alleghenies
Cornell Douglas Foundation
Doppelt Family Foundation
Farvue Foundation
Foundation for Pennsylvania Watersheds
Give Lively Foundation
Heinz Endowments
Jacob and Terese Hershey Foundation
The Mayer & Morris Kaplan Family Foundation
Karsten Family Foundation
Kenelm Foundation
Kentfields Foundation
Andrew and Julie Klingenstein Family Fund
Krehbiel Family Foundation
Landman Family Charitable Foundation
Leaves of Grass Fund
McKnight Foundation
Red Oak Fund
Ronald W. Naito MD Foundation
Park Foundation
Resources Legacy Fund
Rockefeller Family Fund
Shared Earth Foundation
Tilia Fund
Tortuga Foundation
Town Creek Foundation¹
Vishal Foundation
Wallace Genetic Foundation

¹The Town Creek Foundation sunset in 2019 and continues to fund our activities through 2024



Platinum
Transparency
2025

Candid.

Charity
Navigator



FOUR-STAR