October 4, 2022

The Honorable Brenda Mallory
Chair
Council on Environmental Quality
730 Jackson Place, NW
Washington, DC 20506

Dear Chair Mallory:

The 274 undersigned organizations representing communities impacted by trash incinerators[1] and allied organizations urge the White House Council on Environmental Quality (CEQ) to direct the U.S. Environmental Protection Agency (EPA) to update the overdue municipal waste combustor standards, and to close various loopholes that facilitate excessive pollution, and perpetuate rather egregious acts of environmental racism.

The industry is past its prime. The average age of the 48 trash incinerators that have closed since 2000 was just 24.[2] The incinerators that remain are badly aging. Except for two incinerators located in Florida and Pennsylvania, the remaining 66 incinerators are now between 27 and 47 years old, with only six in their late 20s, 54 in their 30s, and six now over 40-years old. While a handful have added units that are newer, the majority are old and suffering from signs of aging. This leads to increased downtime for deferred maintenance, even at incinerators in their early 20s.[3] The 35-year-old Wheelabrator Portsmouth incinerator in Virginia recently disclosed that their unscheduled boiler downtime more than

[1] In this letter, we use the term "trash incinerator" or "incineration" to be synonymous with the legal term, "municipal waste combustor," which EPA has stated multiple times is the same thing. We do not use the unscientific, public relations term "waste-to-energy," and contend that the fundamental harms associated with incineration exist whether small amounts of energy are "recovered" in the process or not. For more on why environmental justice advocates reject the "waste-to-energy" term, see www.energyjustice.net/incineration/waste-to-energy

[2] Energy Justice Network, "Trash Incinerator Closures: 2000-2022," www.energyjustice.net/incineration/closures.pdf

[3] The youngest of the 66 operating trash incinerators built before the turn of the century is the Montgomery County Resource Recovery Facility in Maryland, which came online in 1995. More than any in Covanta's fleet of nearly 40 incinerators, it suffered six fires requiring an off-site emergency response in just two years, the last of which in late 2016 burned for nearly two weeks and led to the report that discussed inadequate upkeep resulting in reduced boiler capacity and high waste storage volumes (pp.1 & 49), "much-needed plant maintenance" (p.4), "lack of maintenance and repair on the boiler and air pollution control systems" (p.49), that "[m]any of the facility systems and components have not been maintained to industry standards" and "[t]here are many operational issues at the plant that are a result of poor maintenance history that are taking focus away from safe and efficient operation of the facility" (p.53). This is when the facility was just around 22 years old. See HDR, "Montgomery County Resource Recovery Facility (MCRRF) Root Cause Analysis," May 12, 2017. www.montgomerycountymd.gov/SWS/Resources/Files/rrf/RCA%20Documents.pdf See p.89 (PDF page numbering) for chart showing fire frequency.

doubled from 1,300 hours in 2019 to 3,300 hours in 2021 and that their performance is "not even close" to expectations.[4]

Nearly three quarters of the nation's trash incinerators are among the top three industrial air polluters in their counties, 57% are among the top two, and 31% top the list, according to data from EPA's National Emissions Inventory.[5] This air pollution contributes to asthma attacks, cancers, birth defects, heart attacks, strokes, and a myriad of other public health problems, exacerbating existing health disparities considering where the largest and most polluting incinerators sit. Studies that have found connections between trash incinerators and public health primarily notice increased cancers, respiratory diseases and symptoms, and cardiovascular diseases.[6]

There are three important policies needed for proper regulation and oversight of any air polluting facility: 1) strict standards, 2) continuous emissions monitoring, and 3) aggressive enforcement with fines sufficient to alter behavior. None of these currently exist.

Standards

Too many incinerators are allowed to operate without the full set of pollution control devices. Most trash incinerators have four pollution control devices, designed to handle different pollutants. However, 22 of the nation's 68 trash incinerators are completely missing one or more air pollution control systems, including 8 of the 20 largest facilities. Seventeen are missing any controls for nitrogen oxides (NOx) that trigger asthma attacks. Only one trash incinerator (West Palm Beach #2) has state-of-the-art selective catalytic reduction (SCR) for NOx control capable of meeting the modern standard of 45 parts per million. Just a handful of incinerators have the "low-NOx" systems that can bring NOx down to 90-110 ppm, while most still are polluting communities with NOx concentrations permitted as high as 205 ppm. Nine facilities lack any carbon injection systems to reduce the most toxic pollutants such as mercury and dioxins (note that this simply moves these pollutants to the ash, and increases dioxin formation in the process, but concentrates it in the ash). Six facilities still lack baghouse or other forms of particulate matter control, and two still have no lime scrubbers to reduce sulfur oxides.[7]

Even where all four control systems are in place, we know from EPA air emissions databases that, to produce the same amount of energy, trash incinerators are more polluting than burning coal.[8]

Most incinerators are held to significantly weaker standards than those of modern facilities in other countries. The standards applied to operating incinerators are also weaker than would be allowed if they were permitted and built in the past decade. Finally, they're much weaker than EPA standards for

[4] June 22, 2022 Minutes of the Board of Directors of the Southeastern Public Service Authority of Virginia, p.5. www.spsa.com/application/files/1616/5894/5466/Board_Minutes_-_06.22.22_-_Signed.pdf

[5] Rankings are based on total pounds of health-damaging air pollution, not counting greenhouse gases, which also often top the list. See U.S. EPA 2017 National Emissions Inventory www.epa.gov/air-emissions-inventories/2017-national-emissions-inventory-nei-data Note that this summary of rankings is simply summing up the pounds of non-GHGs, and largely reflects NOx and other high volume pollutants. We recognize that many air contaminants released in smaller amounts can be far more dangerous than the high-volume ones and note that these other pollutants of concern, such as hydrochloric acid and various toxic metals, also place trash incinerators at or near the top of any rankings within their counties.

[6] Energy Justice Network, "Trash incineration FACT CHECK: Covanta's 'Energy-from-Waste & Health Risk' flyer," Feb. 2021. www.energyjustice.net/incineration/healthstudies.pdf

[7] Energy Information Administration, Form 860 database. www.eia.gov/electricity/data/eia860/

[8] Energy Justice Network, "Trash Incineration More Polluting than Coal," Sept. 2022. www.energyjustice.net/incineration/worsethancoal

the burning of other types of waste, such as medical waste, even though many of the same pollutants are released, and in larger quantities because trash incinerators are larger facilities.

Monitoring

Only three pollutants are monitored on a continuous basis (NOx, SO_2, and CO) at most trash incinerators, with some rare exceptions such as the six in Pennsylvania also monitoring hydrochloric acid on a continuous basis. Other pollutants, if monitored at all, are typically tested once per year, and sometimes less frequently. If we regulated motorists the way we do most pollutants from smokestacks, it would be akin to enforcing a speed limit by allowing drivers to drive all year with no speedometer. Once a year, a speed trap would be set on the highway with signs warning "slow down... speed trap ahead," and the driver's brother would be running the speed trap (companies choose who they pay to conduct the test). Some incinerator operators have also been known to manipulate emission testing to present lower emissions levels to regulators.[9]

Increased downtime at aging incinerators results in higher emissions from startup and shutdown occurrences. Dioxin emissions are a stark example. One study out of Europe found that using continuous sampling for dioxins at incinerators found the actual emissions to be 32-52 times higher than we think they are in the U.S. when requiring incinerators to test each unit just once every one to four years under ideal operating conditions.[10,11] A more recent study found that our failure to use continuous sampling technology is underestimating dioxin emissions by 460 to 1,290 times.[12] Considering that continuous sampling technology has been tested and verified by EPA since 2006[13] and that dioxin is the most toxic substance known to EPA – 140,000 times more toxic than mercury[14] – there is no excuse for not requiring continuous dioxin sampling at waste incinerators.

Similarly, the technology to continuously monitor mercury, particulate matter, hydrochloric acid, and other regulated air pollutants from trash incinerators has existed for far too long that it's time for enforcement of new EPA standards to be based on continuous monitoring to ensure that spikes in

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[9] In Connecticut, Covanta was fined $20,000 in 1993 in a civil action filed by the state Attorney General in response to an employee adjusting a continuous emissions monitoring device to alter a reading in order to pass a continuous emissions monitoring audit. In Tulsa, Oklahoma in 2013, Covanta was the target of a criminal investigation by the U.S. Attorney's Office "related to alleged improprieties in the recording and reporting of emissions data" in which Covanta entered into a non-prosecution agreement to follow applicable laws and regulations and pay a $200,000 "community service payment" to the state environmental agency. For the Connecticut incident, see page 37 for this 1993 incident reported in this 93-page compilation of Covanta's U.S. violations through September 2006: www.energyjustice.net/files/incineration/covanta/violations2006.pdf. For Tulsa, see Covanta Holding Corporation's 2019 10-K Securities and Exchange Commission filing, p. 105. (see "Tulsa Matter" describing the consequences of this 2013 incident) d18rn0p25nwr6d.cloudfront.net/CIK-0000225648/992dfb7f-398d-4b17-8e33-75e956f6f235.pdf

[10] Annual stack testing is required to be done under optimal operating conditions, and are thus designed not to catch the excessive emissions that occur during startup, shutdown, and malfunction conditions. Also, for dioxins and furans, annual dioxin testing is often allowed to be conducted on just one boiler unit each year, on a rotating basis. This means many units are being tested for dioxins – the most toxic chemicals known to science – just once every two to four years (all but three trash incinerators have two to four units).

[11] De Fré R, Wevers M. "Underestimation in dioxin emission inventories," Organohalogen Compounds, 36: 17–20. www.ejnet.org/toxics/cems/1998_DeFre_OrgComp98_Underest_Dioxin_Em_Inv_Amesa.pdf

[12] Arkenbout, A, Olie K, Esbensen, KH. "Emission regimes of POPs of a Dutch incinerator: regulated, measured and hidden issues." docs.wixstatic.com/ugd/8b2c54_8842250015574805aeb13a18479226fc.pdf

[13] Environmental Protection Agency, Environmental Technology Verification Program. archive.epa.gov/nrmrl/archive-etv/web/html/vt-ams.html

[14] Environmental Protection Agency, Risk-Screening Environmental Indicators (RSEI) Model. www.epa.gov/rsei

emissions, especially during startup, shutdown, and malfunction times, are not missed for lack of looking.

Enforcement

Finally, state enforcement agencies are notoriously lax and understaffed, and when notices of violation are issued, they're often accompanied by zero fines, or fine amounts are allowed to be negotiated down. Fines are never more than the cost of doing business. Even "large" fines can amount to just a few days of tipping fee revenue, and are insufficient to cause an incinerator owner to invest in needed boiler upgrades or more protective emissions controls, which are more costly than habitually paying fines. Some states even limit the amount of fines under old laws that ensure that fines are just an annoyance and "the cost of doing business," rather than a deterrent.[15] Requiring continuous monitoring allows for more frequent fines for chronic violators and can correct for the tendency to defer maintenance and just pay the infrequent fines.

Recommendations

We are in dialogue with Biden Administration appointee, Dr. Carlton Waterhouse, and his staff at EPA's Office of Land and Emergency Management and are thankful for their engagement and receptivity as they revisit the agency's Waste Management Hierarchy and Waste Reduction Model (WARM).

We seek CEQ's support in urging EPA to continue this work and to modernize its outdated municipal waste combustor regulations as well as address their various policies and loopholes that facilitate and perpetuate the incineration industry. These policy changes are needed to ensure environmental justice since trash incinerators disproportionately impact Black, Indigenous and people of color (BIPOC) communities who live fence line with the largest and most urban incinerators in the industry.[16]

Specifically, we ask CEQ's support for the following changes at EPA:

1. **Bring all incinerators up to modern standards**, including modern emissions limits and continuous emissions monitoring for all regulated pollutants for which permit limits are set (toxic metals, dioxins, particulate matter, acid gases, etc.).

[15] For example, in October 2020, the Covanta Plymouth Renewable Energy trash incinerator in Montgomery County, Pennsylvania was fined $218,393 for violations relating to operational problems causing loud noise and burning plastic and electrical fire smells in the community that have been recurring for over three years now. That amount was considered to be a large fine, but amounted to about three days of Covanta's tipping fee revenues, and failed to stop the recurring problems that continue to this day.

[16] The trash incineration industry in the U.S., as a whole, does not have a disproportionate impact by economic class, but has a strong environmental racism trend. While 67% of the nation's 68 remaining trash incinerators are located in majority white communities, the industry has a strong and disproportionate impact on people of color because the largest and dirtiest are located in majority BIPOC communities that tend to be more populated. Fifteen of the 20 largest trash incinerators (75%) are located in such communities. The environmental racism trend in this industry is found not by looking at how many incinerators are in communities of color, but when factoring in the number of impacted people living near them or the size of the incinerators. The 17 incinerators that are 2,000 tons per day (tpd) or greater have more capacity than the 51 incinerators that are under 2,000 tpd combined. On average, trash incinerators in majority BIPOC communities are surrounded by 2.5 times as many people and are twice as large as those in majority white communities: 27 facilities averaging 1,850 tons/day vs. 41 facilities averaging 909 tons/day. See more at www.energyjustice.net/incineration/ej

2. **Stop the promotion of burning trash as renewable energy or that trash incineration (and landfilling ash) is preferable to direct use of landfills.**[17] This is expressed through EPA's Waste Management Hierarchy that, without any documentation, places incineration ("energy recovery") above landfilling ("disposal") – messaging that is exploited by the incineration industry and carried by states and local governments that use it to justify a preference for incineration. It's also reinforced by EPA's Waste Reduction Model (WARM), which has never been peer reviewed and contains major flaws that result in a bias in favor of incineration.[18] EPA's pro-incinerator bias shows up across various waste streams and EPA ought to recommend safer non-burn alternatives instead.[19]
3. **Close the loopholes**. Medical waste incineration regulations permit trash incinerators to burn medical waste without being subject to the much stricter requirements for medical waste incinerators – a loophole that is allowing for large-scale medical waste burning without proper emissions control. EPA's Non-Hazardous Secondary Materials rule is another loophole which permits waste burning without waste incineration regulation so long as limited chemical composition data shows the fuel to seem preferable to coal – a rather low bar. EPA should stop issuing "comfort letters" which enable this practice.
4. **Improve disclosure.** Start requiring all sorts of incinerators (trash, sewage sludge, medical waste, etc.) to report to the Toxics Release Inventory (TRI) database. Include emissions of dioxins in the National Emissions Inventory (NEI) and start publishing NEI data annually.
5. **Complete the long-abandoned dioxin reassessment**, and conduct an updated dioxin inventory.
6. **Protect local clean air laws.** Issue a clarifying legal opinion that the Clean Air Act does not preempt states or local governments from having their own, more protective, clean air laws.[20]

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[17] EPA claims that burning trash is "renewable" energy – a claim that the incineration industry exploits. See www.epa.gov/smm/energy-recovery-combustion-municipal-solid-waste-msw. This despite the fact that over half of the energy generation is from "non-biogenic" sources (primarily plastic), which is produced from non-renewable fossil fuels. See U.S. Energy Information Administration, "Technical Notes to the Electric Power Monthly, Appendix C," pp. 17-19. www.eia.gov/electricity/monthly/pdf/technotes.pdf

[18] EPA's Waste Reduction Model (WARM) puts the finger on the scale in favor of incineration primarily through two flawed assumptions. One is by failing to account for the fact that about 2/3rds of trash incinerators operate in states where they compete with zero-emission renewable energy sources in state renewable portfolio standards. Assumptions that fossil fuels are being displaced are largely incorrect. The other major flaw is EPA's assumption that the "biogenic" fraction of municipal waste is carbon neutral and that nearly half or more of an incinerator's GHGs can be ignored. This has been debunked for over a decade, as climate scientists point out that it's double counting because climate models already account for plant regrowth. Also, without incinerators investing in additional plant regrowth, any reductions must be applied to landfilling and zero waste solutions because plants are regrowing in all scenarios, not just for incinerators aiming to zero out their excessive emissions. See www.energyjustice.net/files/dc/2021-08-13ChehLetterToDPW.pdf for a recent example of political pushback on the biases in WARM being used to guide local policy – in this case, the Chair of the District of Columbia City Council's Environment and Transportation Committee objecting to the use of these biased assumptions when a consultant then used the WARM to justify continued burning of the District's trash in the largest air polluter in the Washington, DC area, the Covanta Fairfax incinerator in the community of color in Lorton, VA. Not just in WARM, EPA must stop "adjusting" the GHG emissions from trash and biomass incineration in its emissions databases as if the CO_2 emitted is zero, as this is based on outdated and scientifically debunked notions of biomass carbon neutrality.

[19] We urge EPA to stop promoting incineration as a solution for disposal of pharmaceuticals, PFAS / aqueous film-forming foam (AFFF), hazardous waste, or other waste streams, when safer non-burn technologies exist for all of these, and to stop allowing incineration (rotary kilns or otherwise) at Superfund cleanup sites.

[20] The unanimously adopted Baltimore Clean Air Act was wrongly struck down in federal district court in 2020 – mainly on state preemption grounds, but also on the claim that the federal Clean Air Act preempts such laws. In fact, the opposite is true, as 42 U.S.C. § 7416 explicitly authorizes states and their political subdivisions to have their own clean air laws as strict or stricter than the Clean Air Act. This misguided ruling, if applied more broadly, threatens the many local and regional clean air programs that have existed for decades. See www.cleanairbmore.org/cleanairact/ and for the filings and ruling, see www.cleanairbmore.org/cleanairact/lawsuit.

7. **Regulate incinerator ash as hazardous waste and disallow its use as landfill cover material and other "beneficial" uses.** Disallow combining of fly ash and bottom ash. Stop relying on the Toxicity Characteristic Leaching Procedure (TCLP) test, allowing the industry to handle ash as non-hazardous based on what leaches out under pH-manipulated conditions.[21] Recognize that there are other exposure pathways, especially when ash is used as daily cover material at landfills.

We also ask that CEQ address its own recent perpetuation of EPA's Waste Management Hierarchy in its recent *Implementing Instructions for Executive Order 14057 – Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*.[22] While EPA has committed to reevaluating this hierarchy and whether incineration should be prioritized over landfilling, CEQ is specifically recommending that "waste-to-energy combustion facilities" be a higher "priority for waste management" than landfilling.[23] Considering the White House Environmental Justice Advisory Council's recent recommendations to CEQ to direct EPA to update its overdue municipal waste combustor emissions standards and acknowledgement of the negative impacts the incineration industry has on environmental justice communities, CEQ's inclusion of waste combustion in its own guidance is perplexing and a serious concern.

We are eager to meet with CEQ to share more details about these solutions working in partnership with EPA's leadership to address the impacts of incineration on frontline communities.

Sincerely,

Michael Ewall, Esq.
Executive Director
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mike@energyjustice.net
www.energyjustice.net

[CO-SIGNING ORGANIZATIONS ATTACHED]

Cc: Michael S. Regan, Administrator, U.S. Environmental Protection Agency
Dr. Carlton Waterhouse, Deputy Assistant Administrator, Office of Land and Emergency Management, U.S. EPA
Joe Goffman, Principal Deputy Assistant Administrator, Office of Air and Radiation, U.S. EPA
Mr. Richard Moore, Chair, White House Environmental Justice Advisory Council
Ms. Peggy Shepard, Chair, White House Environmental Justice Advisory Council

[21] Work on Waste USA, *Waste Not* issues #280 (May 1994) and #315, 316, 317, 318 (March 1995). www.energyjustice.net/incineration/ash.pdf

[22] The White House Council on Environmental Quality, "Implementing Instructions for Executive Order 14057 -- Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability," Aug. 2022, p.44. www.sustainability.gov/pdfs/EO_14057_Implementing_Instructions.pdf

[23] See statement under the hierarchy: "EPA is now in the process of reviewing the waste hierarchy to determine if potential changes should be made based on the latest available data and information." U.S. Environmental Protection Agency, "Sustainable Materials Management: Non-Hazardous Materials and Waste Management Hierarchy," July 5, 2022. www.epa.gov/smm/sustainable-materials-management-non-hazardous-materials-and-waste-management-hierarchy

Co-signed organizations:

350 Bucks County (PA)
350 Fairfax (VA)
350 Hawai'i (HI)
350 Kishwaukee (IL)
350 New Hampshire (NH)
350 Philadelphia (PA)
350 Salem (OR)
A SMART Collaboration LLC (PA)
Action for the Climate Emergency (MA)
Afro-Vegan Society (MD)
Alaska Community Action on Toxics (AK)
All Our Energy (NY)
All Together Now Pennsylvania (PA)
Alliance For A Clean Environment (PA)
Alliance for Health & the Environment (MA)
Alliance for Sustainable Communities - Lehigh Valley (PA)
Alliance for the Wild Rockies
American Environmental Health Studies Project (NY)
Americans for Democratic Action Hawai'i (HI)
Asian Pacific Islander Political Alliance (PA)
Baltimore Compost Collective Program (MD)
Baltimore Green Space (MD)
Beaver County Marcellus Awareness Community (PA)
Berks Gas Truth (PA)
Better Path Coalition (PA)
Beyond Extreme Energy (PA)
Beyond Plastics (NY)
Beyond Toxics (OR)
Big Island Reef Keepers Hui (HI)
Big Reuse (NY)
Biofuelwatch (National)
Black Millennials 4 Flint (National)
Blue Ridge Environmental Defense League (NC)
Borough of Media, Pennsylvania, Environmental Advisory Council (PA)
Breakthrough Communities/Earth House Center (CA)
Breathe Easy Susquehanna County (PA)
Breathe Free Detroit (MI)
Bristol Residents for Clean Air (CT)
Brookhaven Landfill Action & Remediation Group (NY)
Buckeye Environmental Network (OH)
Bucks Environmental Action (PA)
California Environmental Justice Coalition (CA)
Californians Against Waste (CA)
Camden Education Association (NJ)
Camden for Clean Air (NJ)
Campus Coalition Concerning Chester (C4) (PA)

Cease Fire Campaign (National)
Center for a Sustainable Coast (GA)
Center for Coalfield Justice (PA)
Chamber of Sustainable Commerce (HI)
Chapel Hill Organization for Clean Energy (NC)
Chester Residents Concerned for Quality Living (PA)
Chestnutwold Elementary Roots and Shoots (PA)
Citizens Action Coalition of Indiana (IN)
Citizens' Climate Lobby of Chester County (PA)
Clean Air Action Network of Glens Falls (NY)
Clean Air Baltimore Coalition (MD)
Clean Air Coalition of Greater Ravena-Coeymans (NY)
Clean Air Council (PA)
Clean Air Now Coalition (OR)
Clean Power Task Force (HI)
Clean the Pacific (HI)
Clean Water Action (National)
Clean Water Action Council of Northeast Wisconsin (WI)
Climate Protectors Hawai‘i (HI)
Cltizens for Safe Water Around Badger (WI)
Coalition to Protect New York (NY)
Comeback Farm Organic Produce (NJ)
Compost Crew (MD/DC/VA)
Concerned Citizens for Nuclear Safety (NM)
Congregation Beth Israel of Media (PA)
Connecticut Coalition for Environmental and Economic Justice (CT)
Connecticut Zero Waste Coalition (CT)
Conservation Law Foundation (MA)
Cool Green Schools (MD)
Cooperative Energy Futures (MN)
Covanta Plymouth Information and Awareness Group (PA)
DAMS Inc (National)
Darby Creek Valley Association (PA)
DC Environmental Network (DC)
DC Marijuana Justice (DC)
DC Public Banking Center (DC)
DC Statehood Green Party (DC)
Delaware Riverkeeper Network (PA)
Democratic Socialists of America - Delaware County (PA)
Democratic Socialists of America - Lower Hudson Valley (NY)
Democratic Socialists of America - Salem (OR)
Don't Trash the Catskills (NY)
Don't Waste Arizona (AZ)
Downwinders at Risk (TX)
Earth Ethics, Inc. (FL)
Earth Quaker Action Team (PA)
EarthCare, Newtown (PA)
East Michigan Enironmental Action Council (MI)

East Yard Communities for Environmental Justice (CA)
Eco-Cycle (CO)
Eco-Integrity Alliance (CO)
Eco-Justice Collaborative (IL)
Ecology Center (MI)
Ecology Party of Florida (FL)
Elgin Green Groups 350 (IL)
Elmirans and Friends Against Fracking (NY)
Environmental Action Committee (PA)
Environmental Caucus of the Democratic Party of Hawai'i (HI)
Environmental Justice Clinic, University of Miami School of Law (FL)
Environmental Justice Coalition for Water (CA)
Environmental Justice Ministry, Cedar Lane Unitarian Universalist Church (VA)
Envision Frederick County (MD)
Fairmount Neighbors (PA)
Faith Alliance for Climate Solutions (VA)
Federated Conservationists of Westchester County (NY)
Fenceline Watch (TX)
Food & Justice w/ Brenda Sanders (MD)
Food & Water Watch (National)
Fossil Free Tompkins (NY)
Fox Valley Citizens for Peace & Justice (IL)
FrackBusters NY (NY)
FracTracker Alliance (PA)
Gas Free Seneca (NY)
Glen Echo Heights Mobilization (MD)
Go Green OC (MD)
Grassroots Environmental Education (NY)
Green Delaware (DE)
Green New Deal Virginia (VA)
Green Party of Nassau County (NY)
Green State Solutions (IA)
Greenacres-Woodward Civic Association (MI)
Greenaction for Health and Environmental Justice (CA)
Greenpeace USA (National)
Grey Nuns of the Sacred Heart (PA)
Hands off the Hudson (NY)
Heartwood
Hudson River Sloop Clearwater (NY)
IHM Social Justice Committee (PA)
Indian Point Safe Energy Coalition (NY)
Indivisible Upper Darby (PA)
Inland Ocean Coalition
Inland Ocean Coalition – North Texas Chapter (TX)
Institute for Local Self-Reliance (National)
Iowa Green Party (IA)
Jamesville Positive Action Committee (JAMPAC) (NY)
Just Transition Alliance (NM)

Just Zero (National)
Keep It Greene (NY)
KingstonCitizens.org (NY)
Kokua Na Aina (Heal the Land) (HI)
Latinos Unidos Siempre (OR)
Life of the Land (HI)
Lights Out Norlite (NY)
Long Island Progressive Coalition (NY)
Lynn Neighbor to Neighbor (MA)
Madison County Clean Power Coalition (GA)
Marcus Hook Area Neighbors for Public Health (PA)
Maryland Conservation Council (MD)
Media Alliance Inc (NY)
Michigan Environmental Justice Coalition (MI)
Midlothian Breathe (TX)
Mid-Missouri Peaceworks (MO)
Midtown Alliance (MI)
Minnesota Environmental Justice Table (MN)
Montana Environmental Information Center (MT)
Montgomery Countryside Alliance (MD)
Mothers Out Front - Dutchess (NY)
NAACP, Chester Branch (PA)
NAACP, Indiana State Conference (IN)
NC Climate Justice Collective (NC)
Nehemiah Group (NJ)
Neighbors Against the Burner (MN)
Neighbors Against the Gas Plants (PA)
New Jersey Student Sustainability Coalition (NJ)
North Country Earth Action (NY)
Occidental Arts and Ecology Center (CA)
Occupy Bergen County (NJ)
Orchard School Community Center (NH)
Our Revolution Hawai'i (HI)
Palm Beach County Environmental Coalition (FL)
Parish House, Inc. (NY)
Pavilion Tenants Association (NJ)
Peace, Justice, Sustainability NOW! (PA)
Peckham Action Group (NY)
Peekskill Progressives (NY)
PennEnvironment (PA)
Pennsylvania League of Women Voters (PA)
People for a Healthy Environment (NY)
People for Community Recovery (IL)
Physicians for Social Responsibility Pennsylvania (PA)
Plastic Pollution Coalition (National)
Pleasant Meadow Philanthropy (NY)
Progressive Democrats of Hawai'i (HI)
Project CoffeeHouse (PA)

Protect All Children's Environment (NC)
Protect Our Water & Air (POWA) (PA)
Public Employees for Environmental Responsibility (National)
Pueblo Action Alliance (NM)
Race to Zero Waste (CA)
Racial Concerns Committee at Unitarian Universalist Fellowship at Stony Brook (NY)
Recycle Hawai'i (HI)
Recycling Advocates of Middle Tennessee (TN)
Red de Acción por los Derechos Ambientales (Chile)
Rensselaer Environmental Coalition (NY)
ResistSpectra (NY)
Responsible Decarbonization Alliance (PA)
Rusty & The Crew (MN)
Safe Energy Rights Group (SEnRG) (NY)
Safe Healthy Playing Fields Inc (MD)
Sane Energy Project (NY)
Save the Quiet Corner (CT)
Second Look (National)
Senator Mike Gabbard, Chair, Hawai'i State Senate Committee on Agriculture and Environment (HI)
Seneca Lake Guardian (NY)
Shagbark, Inc. (IN)
Sierra Club (National)
Sisters of St. Francis of Philadelphia (PA)
Solarize Albany (NY)
Solebury Environmental Action Committee (PA)
Solidarity Committee--Capital District (NY)
South Bronx Unite (NY)
South Jersey Progressive Democrats (NJ)
South Jersey Young Progressive Democrats (NJ)
St Vincent de Paul Church Green Team (MD)
Stop the Algonquin Pipeline Expansion (NY)
Strategy Zero Waste Solutions (MT)
Sugarloaf Citizens Association (MD)
Sunflower Alliance (CA)
Susquehanna Clean Air Network (PA)
Sustainable Putnam (NY)
Sustainable Saratoga (NY)
Sustainable Tucson (AZ)
Syracuse Cultural Workers (NY)
Teaching Artist Institute (MD)
Teamsters Solid Waste and Recycling Division (National)
Texas Environmental Justice Advocacy Services (TEJAS) (TX)
The Center for Environmental Transformation (NJ)
The Last Beach Cleanup (CA)
The Last Plastic Straw (National)
The Story of Stuff Project (CA)
Thrive Baltimore (MD)
Tiny Tote

Tracey Stephens Interior Design, Inc. (NJ)
Tri-Valley CAREs (Communities Against a Radioactive Environment) (CA)
Turtle Island Restoration Network (National)
UDTJ Organization (PA)
Unitarian Universalists for a Just Economic Community (IL)
Unite North Metro Denver (CO)
United 4 Clean Energy (NY)
United Parents Against Lead & Other Environmental Hazards (UPAL) (National)
Usto Ventu Gruppo (CA)
Valley Improvement Projects (CA)
Valley Watch (IN)
Visible Truth 365 (PA)
WaSepa (PA)
Waterway Advocates, Inc. (FL)
Waukesha County Environmental Action League (WI)
WE ACT for Environmental Justice (NY)
We are the People, Inc. (PA)
We Want Green Too (MI)
WESPAC Foundation, Inc. (NY)
West Berkeley Alliance For Clean Air and Safe Jobs (CA)
West End Revitalization Association (NC)
Westchester Alliance for Sustainable Solutions (NY)
Westmoreland Marcellus Citizens' Group (PA)
Westport Community Economic Development Corp (MD)
Working on Waste (NH)
Zero Hour (National)
Zero Waste 4 Zero Burning (ON)
Zero Waste Capital District (NY)
Zero Waste Detroit (MI)
Zero Waste Hawai‘i Island (HI)
Zero Waste Ithaca (NY)
Zero Waste Kaua‘i (HI)
Zero Waste Montgomery County Coalition (MD)
Zero Waste O‘ahu (HI)
Zero Waste USA (National)