

April 28, 2020

The Honorable Andrew Wheeler, Administrator
US Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

The Honorable John Barrasso
Chairman
Committee on Environment & Public Works
United States Senate
410 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Frank Pallone
Chairman
Committee on Energy and Commerce
United States House of Representatives
2125 Rayburn House Office Building
Washington DC 20515

The Honorable Raúl M. Grijalva
Chairman
Committee on Natural Resources
United States House of Representatives
1324 Longworth House Office Building
Washington, DC 20515

The Honorable Thomas R. Carper
Ranking Member
Committee on Environment & Public Works
United States Senate
456 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Greg Walden
Ranking Member
Committee on Energy and Commerce
United States House of Representatives
2322 Rayburn House Office Building
Washington DC 20515

The Honorable Rob Bishop
Ranking Member
Committee on Natural Resources
United States House of Representatives
1329 Longworth House Office Building
Washington, DC 20515

Dear Administrator Wheeler, Chairman Barrasso, Ranking Member Carper, Chairman Pallone, Ranking Member Walden, Chairman Grijalva, and Ranking Member Bishop:

We, the undersigned 152 fence-line community, environmental justice, health, faith, worker, business, conservation, and other concerned organizations, are writing to express our outrage with the policy issued by the U.S. Environmental Protection Agency (EPA) on March 26, 2020, titled "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program." This indiscriminate advance waiver of enforcement and penalties for essential health and safety requirements at tens of thousands of polluting and hazardous facilities will unnecessarily endanger workers and the public, without any application, disclosure, or other oversight required by facilities or the agency.

EPA issued its memo just days after a request from the American Petroleum Institute, and the policy includes exceptions from a laundry list of requirements that the chemical and oil industries have opposed for some time. While we understand that worker shortages may be a reality at the moment, EPA's policy goes far beyond reasonable and appropriate accommodation to the current situation. By providing for waiver of enforcement actions and penalties for

violations of critical worker and public protections, with no submission of evidence required and no time limit, the policy invites facilities to shirk essential responsibilities to protect health and safety without consequence. The policy is so broad that it allows EPA to waive enforcement even if suspension of otherwise required activities causes an “imminent threat” to health or the environment.

At a time when EPA inspections are at a decade-long low, and significant chemical releases or explosions often occur on a weekly basis, a general non-enforcement policy - based on an entity’s unverified self-declaration that otherwise essential health and safety activities are not feasible - is subject to misunderstanding and abuse. Contrary to its purported goals, the policy endangers health and safety precisely when public health is uniquely vulnerable. The policy is misguided at best.

The Policy is Unnecessary and Unsupported

The non-enforcement policy is suspect on its face, because EPA provides no basis for its assumption that facilities that continue to operate during the pandemic, and which continue to fulfill diverse other operational requirements and contracts, cannot continue to implement essential health and safety activities to protect their employees and neighbors. Absent evidence to the contrary (not simply a request from an industry trade association), the agency should expect that facilities continuing normal operations can continue to meet important health and safety requirements.

Likewise, the agency provides no justification for an advance waiver of enforcement and penalties across numerous programs. Although EPA retains the discretion to not pursue enforcement actions for violations of routine reporting requirements due to pandemic-imposed constraints on a case-by-case basis, EPA has not relied on this authority. EPA instead has set out in advance how it does not expect to enforce emissions monitoring and safety inspection requirements - along with many other requirements - at the request of the oil and gas industry itself, with no advance verification that non-compliance is due to COVID-19 and no mandatory public disclosure.¹

The Policy’s Broad Scope Covers Many Activities Essential for Protecting Public Health

The March 26 non-enforcement policy, which the agency made retroactive to March 13, lacks any ‘expiration’ date and applies to a stunningly broad range of activities essential for worker and public health and safety. The EPA calls these activities “routine compliance monitoring and reporting,” giving the false impression that the policy merely covers trivial paperwork. Unfortunately, this is not the case.

Activities that could be suspended based on unverified claims without expectation of enforcement actions or penalties include:

¹ Letter from the American Petroleum Institute to EPA, March 23, 2020, see <https://www.documentcloud.org/documents/6819817-API-Letter-to-EPA-Seeking-Oil-Industry.html>.

- Any activity under almost any statute, regulation, or program within EPA’s authority that a facility could characterize as “routine” compliance monitoring, integrity testing, sampling, laboratory analysis, training, and reporting or certification;
- Specifically, equipment and storage tank integrity testing, and leak detection and repair monitoring, which are critical to identifying imminent failures before they become major or catastrophic releases;
- Emissions monitoring and stack tests, which are necessary to identify malfunctioning equipment or greatly increased toxic emissions that could further threaten public health (especially during a respiratory disease pandemic);
- Fenceline monitoring, which is essential to protect neighboring communities from elevated toxic emissions such as benzene.

The policy itself demonstrates that its scope extends far beyond so-called “routine” monitoring and reporting activities to include those that, if suspended, could dramatically threaten life, health, and the environment. The policy allows that EPA might not pursue enforcement or penalties even if:

- “A facility suffers from failure of air emission control or wastewater or waste treatment systems or other facility equipment **that may result in exceedances of enforceable limitations on emissions to air or discharges to water**, or land disposal, or other unauthorized releases;” or
- If facility operations “**may create an acute risk or an imminent threat to human health** or the environment.”

EPA’s assertion that it will assess facility compliance with the stated intent of the policy (since it will be difficult or impossible to assess compliance with the letter of such a broad and vague policy) after the fact is laughable, given the indiscriminate scope of the policy (which applies to extremely broad categories of requirements within most of the agency’s jurisdiction, and which could easily include over 100,000 facilities and sites). Given its recent substantial reduction in inspections and enforcement even before the pandemic, and the fact that companies that suspend activities under the policy are not required to notify EPA, it seems unlikely that the agency could undertake proper reviews after the fact, or would even attempt to do so.² If EPA truly does have the ability to vet facility claims under this policy and take enforcement actions *post facto*, it should also have the ability to require and process applications for temporary waivers now.

The Policy Undermines Safety and Increases the Possibility of Large or Catastrophic Chemical Releases

² Juliet Eilperin & Brady Dennis, “Under Trump, EPA inspections fall to a 10-year low,” Washington Post, Feb. 8, 2019, at A2, <https://www.washingtonpost.com/climate-environment/2019/02/08/under-trump-epa-inspections-fall-year-low/>, accessed April 13, 2020. Paul Gallay, “Doing Less with Less at EPA: Environmental Enforcement Has Plummeted in the Era of Trump,” 50 ABA Trends 14, July/August 2019 at *15. Environmental Integrity Project, “Paying Less to Pollute: A Year of Environmental Enforcement Under the Trump Administration 1-2 (Feb. 15, 2018), <https://environmentalintegrity.org/wp-content/uploads/2017/02/Enforcement-Report.pdf>, accessed on April 13, 2020.

EPA misleadingly characterizes as “routine” many safety and health requirements that are critical to preventing large or catastrophic chemical releases or explosions. Requirements that EPA specifically notes that facilities may suspend under the policy without consequence include tank integrity testing, tank and piping inspections, leak detection and repair, emission monitoring, and fence line monitoring. EPA prospectively announced that suspension of all of these, and many other, safety and health practices may be exempt from enforcement and penalties even if resulting facility operations “*may create an acute risk or an imminent threat to human health or the environment.*”

The independent U.S. Chemical Safety and Hazard Investigation Board (CSB), which investigates the causes of chemical incidents, has highlighted the need for greater and more consistent **preventive** maintenance as a key “driver of critical chemical safety change.” CSB has also identified inadequate mechanical integrity programs, and delayed or deferred preventive maintenance, as “primary root causes” of major chemical releases or explosions in many investigations.³ CSB’s preventive maintenance recommendations highlight the need for complete component inspection to prevent catastrophic releases, such as the 2012 Chevron refinery fire and explosion in Richmond, CA that caused 15,000 people to seek medical treatment.⁴

Over 12,000 industrial and commercial facilities across the United States that use or store the most toxic or flammable chemicals have worst-case release vulnerability zones of up to 25 miles in radius. A major chemical release or explosion at one of these facilities would not only endanger facility workers and as many as a million nearby residents, but also could flood area medical facilities with patients at the worst possible time.

The Policy Ignores the Link Between Environmental Health and COVID-19 Risk

There is increasing evidence connecting certain “underlying” health conditions with more serious and even life-threatening COVID-19 outcomes. These conditions include asthma, chronic obstructive pulmonary disease (COPD), and other cardiovascular disease.⁵ At the same time, a wealth of epidemiologic research has long shown an association between exposure to industrial pollution and these very health conditions.⁶ Adverse effects on cardiovascular health can occur

³ U.S. Chemical Safety and Hazard Investigation Board, “Drivers of Critical Chemical Safety Change: Preventive Maintenance,” <https://www.csb.gov/recommendations/preventive-maintenance/>, accessed on April 13, 2020.

⁴ U.S. Chemical Safety and Hazard Investigation Board (CSB), “Investigations with open preventive maintenance recommendations,” <https://www.csb.gov/recommendations/pmrecommendations/>, accessed April 13, 2020, and CSB, Final Investigation Report: Chevron Richmond Refinery Pipe Rupture and Fire, August 6, 2012.

⁵ Centers for Disease Control and Prevention (CDC), “Preliminary Estimates of the Prevalence of Selected Underlying Health Conditions Among Patients with Coronavirus Disease 2019 -- United States, February 12 - March 28, 2020,” <https://www.cdc.gov/mmwr/volumes/69/wr/mm6913e2.htm>, accessed on April 13, 2020; and CDC, “Coronavirus Disease 2019 (COVID-10): Groups at Higher Risk for Severe Illness,” accessed on April 24, 2020, <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/groups-at-higher-risk.html>.

⁶ Aruni Bhatnagar, “Environmental Determinants of Cardiovascular Disease,” *Circulation Research* 121, no. 2 (2017): 162-180. Kristen Cosselman, Ana Navas-Acien, and Joel Kaufman, “Environmental Factors in Cardiovascular Disease,” *Nature Reviews Cardiology* 12, no. 11 (2015): 627-642. Diane Gold and Rosalind Wright, “Population Disparities in Asthma,” *Annual Review of Public Health* 26 (2005): 89-113.

even at exposure levels below regulatory standards.⁷ Thus, EPA's decision to relax environmental regulations in the name of the COVID-19 pandemic appears both ironically counterproductive and poorly timed.

EPA has defended its decision by saying that excusing monitoring and reporting does not mean that it will excuse exceedances in emissions (although, as noted above, the policy itself allows that EPA might not take enforcement action even if exceedances happen). It is unclear how EPA will even know if emissions limits are exceeded, because the policy only requires companies to maintain information about noncompliance internally and only provide it to EPA or states upon request. Monitoring and reporting data are critical to frontline communities whose health may be endangered by emissions, or by failure to detect and resolve leaks or malfunctioning equipment. These requirements are also important to deter facilities from exceeding allowed limits on pollution in the first place. EPA should be expanding monitoring requirements and disclosure of information to communities (such as through real-time fence-line air monitoring), not giving polluting facilities a free pass to ignore existing requirements.

A recent study of 3,080 counties across the country showed that even a relatively small increase in fine particulate matter pollution (just one microgram per cubic meter of PM_{2.5}) was associated with a 15% increase in COVID-19 mortality.⁸ Although the study was focused on long-term air pollution levels, even acute increases in pollution precipitated by EPA's non-enforcement policy could endanger health and add a burden to already taxed health systems. For example, short-term air pollution has been repeatedly linked to asthma exacerbations and emergency room visits.⁹ In any case, EPA's policy contains no timeline whatsoever and only vaguely states that it will be reviewed "on a regular basis."

The Impacts of the Policy will Disproportionately Affect Communities of Color and Low-Income Communities, During A Pandemic Already Shown to Exhibit Extreme Racial Disparities

Currently, 39% of the US population (124 million people) lives within three miles of one of the 12,500 high-risk chemical facilities in the country.¹⁰ Due to decades of redlining, housing discrimination, and inequitable planning policies, a disproportionate number of people who live at the fence-line of industry are low-income and Black and Brown communities.¹¹ These communities already grapple with cumulative exposure to harmful pollutants released from these

⁷ Kristen Cosselman et al. 2015.

⁸ Harvard University, "COVID-19 PM_{2.5}: A National Study on Long-Term Exposure to Air Pollution and COVID-19 Mortality in the United States," <https://projects.iq.harvard.edu/covid-pm>, accessed on April 13, 2020.

⁹ Xue-yan Zheng et al., "Association between Air Pollutants and Asthma Emergency Room Visits and Hospital Admissions in Time Series Studies: A Systematic Review and Meta-Analysis," *PloS One* 10, no. 9 (2015): e0138146.

¹⁰ Environmental Justice Health Alliance for Chemical Policy Reform et al, "Life at the Fence-line: Understanding Cumulative Health Hazards in Environmental Justice Communities," September 2018, <https://ej4all.org/life-at-the-fence-line>, accessed on April 10, 2020.

¹¹ Mary B. Collins et al., "Linking 'Toxic Outliers' to Environmental Justice Communities," *Environmental Research Letters* 11, no. 1 (2016): 1-9.

facilities and other sources, in addition to social stressors such as poverty, lack of access to quality health care, and linguistic isolation.¹²

These social and environmental stressors contribute to higher rates of chronic disease, particularly cardiovascular and respiratory illnesses, in fenceline communities. This is especially concerning in light of the ongoing COVID-19 pandemic. Black and Hispanic workers are less likely than non-Hispanic white workers to be able to telework, putting them at greater risk of exposure to the virus.¹³ Already, data shows that black people are contracting and dying from the virus at significantly higher rates than other racial/ethnic groups.¹⁴

EPA's policy only serves to further endanger overburdened communities, putting them at risk of increased exposure to chemicals and hazardous waste, or a catastrophic explosion. Elevated exposure to harmful airborne pollutants may also leave these families more vulnerable to severe disease and mortality from COVID-19. Given what we now know about the correlation between a person's baseline health conditions, exposure to air pollution and the likelihood of dying from COVID-19, the EPA should be doing more, not less to monitor and enforce critical safeguards.

Affected Communities and Workers Call on EPA and Congress to Act

COVID-19 has exposed how our system fails the most underserved and underrepresented populations, and this policy only exacerbates the hazards and exposures that have made communities of color, Indigenous communities, and low-income communities more susceptible to the virus. The health of facility workers and frontline communities who already live with unacceptable daily air pollution that has resulted in disproportionately higher rates of cancer and respiratory diseases should not be further endangered under the guise of the current pandemic.

Our organizations recommend that:

- EPA rescind the policy outright, or replace it with a more specific, time-limited, much more narrowly targeted policy that provides for waivers on a case-by-case basis when supported by evidence, and that are immediately disclosed to affected workers and communities;
- If EPA does not rescind the policy or replace it with a much more targeted and time-limited policy, the agency must act on the petition for emergency rulemaking submitted on April 1, 2020, and promptly adopt a rule to ensure that companies immediately inform

¹² Rachel Morello-Frosch et al., "Understanding the Cumulative Impacts of Inequalities in Environmental Health: Implications for Policy," *Health Affairs* 30, no. 5 (2011): 879-887.

¹³ Economic Policy Institute, "Not Everybody Can Work from Home: Black and Hispanic Workers are Much Less Likely to be Able to Telework," March 19, 2020, <https://www.epi.org/blog/black-and-hispanic-workers-are-much-less-likely-to-be-able-to-work-from-home/>, accessed on April 10, 2020.

¹⁴ Washington Post, "The Coronavirus is Infecting and Killing Black Americans at an Alarming High Rate," April 7, 2020, <https://www.washingtonpost.com/nation/2020/04/07/coronavirus-is-infesting-killing-black-americans-an-alarmingly-high-rate-post-analysis-shows/>, accessed on April 10, 2020.

EPA if they suspend any monitoring or reporting under the policy, and that EPA disclose any such suspensions to the public in a timely manner;¹⁵

- If EPA does not rescind the policy, Congress should exercise strong oversight of its implementation and hold EPA accountable to protecting public health and safety through compliance with the specific recommendations above; and
- EPA, or Congress if EPA fails to promptly do so, should provide clear and confidential means for facility workers and affected community members to anonymously report concerns about facility suspension of activities that may endanger health, safety, and the environment directly to the Agency, and establish systems to act immediately on those reports (including maintaining confidentiality of reports, and referring workplace health and safety concerns to the Occupational Health and Safety Administration).

If you have questions about our recommendations or a response, please contact on behalf of the signatories to this letter: Darya Minovi, MPH, Policy Analyst with the Center for Progressive Reform, at dminovi@progressivereform.org or 202-747-0698 extension 6.

For Health and Justice,

The undersigned 152 affected community, environmental justice, faith, worker, business, conservation, health, and other concerned organizations, and 118 affected and concerned individuals.

Organizations

A Better Chance A Better Community
Alaska Community Action on Toxics
Alianza Nacional de Campesinas
All Bright Solar
Alliance for Affordable Energy
Alliance of Nurses for Healthy
Environments
Azul
Better Building Institute Inc. (nfp)
Beyond Plastics
Beyond Toxics
Breast Cancer Prevention Partners
Brighter Green
Buckeye Environmental Network
Buxmont Coalition for Safer Water
California Healthy Nail Salon Collaborative
California Wilderness Coalition
Californians for Pesticide Reform

CALPIRG
Catskill Mountainkeeper
Center for Biological Diversity
Center for Earth, Energy and Democracy
Center for Environmental Health
Center for Food Safety
Center for Progressive Reform
Center for Public Environmental Oversight
Central Coast Alliance United for a
Sustainable Economy (CAUSE)
Central Illinois Healthy Community
Alliance
Central Valley Air Quality Coalition
(CVAQ)
Citizens for a Healthy and Safe Environment
Clean Power Lake County
Clean Water Action/Clean Water Fund

¹⁵ Natural Resources Defense Council, Environmental Justice Health Alliance et al, “Petition for Emergency Rulemaking”, April 1, 2020, see <https://www.nrdc.org/sites/default/files/petition-emergency-rulemaking-20200401.pdf>.

Climate Reality Project -- Chicago, IL
Chapter
Coalition for Clean Air
Columbus Community Bill of Rights
Columbus Community Rights Coalition
(CCRC)
Coming Clean
Conceivable Future
Concerned Citizens of Lake Township
CRLA Foundation
Delaware Concerned Residents for
Environmental Justice
Dogwood Alliance
Don't Waste Arizona
Dr. Yolanda Whyte Pediatrics
Earth Ethics, Inc.
Earthjustice
Eco-Justice Collaborative
Endangered Species Coalition
Environment America
Environment North Carolina
Environmental Health Strategy Center
Environmental Justice Health Alliance for
Chemical Policy Reform
Environmental Protection Network
Epidemic Answers
Erin Brockovich Foundation, Inc.
Faith in Place Action Fund
Farmworker Association of Florida
FreshWater Accountability Project
Friends Committee on Legislation of
California
Friends of the Earth
Gasp
Greenpeace US
Guernsey County Citizens Support on
Drilling Issues
Harambee House, Inc / Center for
Environmental Justice
Headwater Education Project
Hudson River Sloop Clearwater, Inc.
Illinois Climate Action Table
INSTITUTE4Science & Interdisciplinary
Studies
Integrated Resource Management, Inc.

International Center for Technology
Assessment
International Pollutants Elimination
Network (IPEN)
Investor Advocates for Social Justice
Jobs to Move America
Just Transition Alliance
LEAD for Pollinators, Inc.
Learning Disabilities Association of
America
Learning Disabilities Association of Georgia
Learning Disabilities Association of Illinois
Learning Disabilities Association of Maine
Learning Disabilities Association of
Michigan
Learning Disabilities Association of
Minnesota
Learning Disabilities Association of
Oklahoma
Learning Disabilities Association of Oregon
Learning Disabilities Association of South
Carolina
Learning Disabilities Association of
Tennessee
Little Village Environmental Justice
Organization
Los Jardines Institute
Maryland Pesticide Education Network
Material Research L3C
Metro East Green Alliance
Michigan State University and Hurley
Children's Hospital Pediatric Public
Health Initiative
Midwest Environmental Justice
Organization
Moms Across America
National Black Worker Center Project
National Family Farm Coalition
Natural Resources Defense Council
New Jersey Environmental Justice Alliance
New Jersey Friends of Clearwater
Nontoxic Certified / MADE SAFE
North Carolina Council of Churches
North Carolina Interfaith Power & Light
Northeastern Environmental Justice
Research Collaborative

Northern California Recycling Association
 Northern Illinois Jobs with Justice
 Northwest Atlantic Marine Alliance
 Northwest Center for Alternatives to
 Pesticides
 Nuclear Energy Information Service (NEIS)
 NYS AAP - Chapter 2
 Oak Park Area Climate Action
 ONE Northside
 Oregon Physicians for Social Responsibility
 Pesticide Action Network
 Philly Thrive
 Physicians for Social Responsibility, Los
 Angeles
 Physicians for Social Responsibility, San
 Francisco Bay Area Chapter
 Planning and Conservation League
 Plastic Oceans International
 Prairie Rivers Network
 Public Citizen
 Rabun Gap Chapter of the Blue Ridge
 Environmental Defense League
 Rachel Carson Council
 REACT (Rubbertown Emergency ACTION)
 ReGenesis Community Development
 Corporation
 Regional Asthma Management and
 Prevention
 Safer States
 Second Unitarian Church of Chicago
 Sierra Club

Sisters of St. Francis of Philadelphia
 Socially Responsible Agricultural Project
 Southeast Environmental Task Force
 Southeast Side Coalition to Ban Petcoke
 Surfrider Foundation
 Sustaining Way
 Texas Environmental Justice Advocacy
 Services (t.e.j.a.s.)
 Texas Interfaith Center for Public
 Policy/Texas Impact
 The Christopher Reynolds Foundation
 The Environmental Justice Coalition for
 Water
 The Post-landfill Action Network
 Toxic Free NC
 Toxics Action Center
 Turtle Island Restoration Network
 U.S. PIRG
 Unitarian Church of Hinsdale
 Unitarian Universalist Advocacy Network of
 Illinois
 Unitarian Universalist Service Committee
 Unity Temple Unitarian Universalist
 Congregation
 UPSTREAM
 Veterans For Peace, Chicago Chapter
 Women's Voices for the Earth
 Worker Justice Center of New York
 Zero Breast Cancer
 350 Chicago
 350 Silicon Valley

Individuals

The signatures listed below indicate individual support, and do not reflect their affiliation's view unless that entity is listed separately above under Organizations.

1. Adair B. Small
2. Alejandro E. Camacho, Professor of
 Law and Faculty Director, Center for
 Land, Environment, and Natural
 Resources, University of California,
 Irvine
3. Alison Price
4. Amy D Kyle, PhD MPH
5. Amy Hassinger
6. Andrea Agrimonti
7. Angela Czapiewski
8. Anne M. White
9. Bart Ostro, Research Professor, UC
 Davis
10. Benjamin J. Ashraf, MPH
11. Betsey Zemke
12. Brian Nielsen, Ph.D.
13. Christine Peters

14. Christine Silvey, MCC, CTPP
15. Christopher Smith
16. Claudia Gonzalez, Organizer FWWAF
17. Claudia Steinbrecher, LCSW
18. Cynthia Swacina, RPH
19. Dan O'Brien
20. Darius D. Sivin, PhD
21. David Bates-Jefferys
22. David Black
23. David Guran
24. Deborah Donovan
25. Deborah Montgomery
26. Deborah Wallace Ph.D., retired
senior project leader, consumers
Union
27. Don Dieckmann
28. Dr. Kenneth Small
29. Dr. Rosemary Ahtuanguaruak, Inupiat
Tribal Leader, mother and
grandmother, ARCUS Indigenous
Scholar
30. El'gin Avila
31. Elena Sasso
32. Elizabeth Dowell, MD
33. Elizabeth Glass Geltman, Associate
Professor, CUNY School of Public
Health; Lecturer, Johns Hopkins
University; Chair-elect, Law Section,
American Public Health Association
34. Emily Hammond, Professor of Law,
The George Washington University
35. Francis S. Short, M.A.
36. Frank Zhu, CPA
37. Gizelle Alvarez
38. Glenn Mills
39. Gloria E. Barrera
40. Harold Mitchell, Executive Director,
ReGenesis Community Development
Corporation
41. Heath Rednick
42. Heather Elliott, Alumni, Class of '36
Professor of Law, University of
Alabama School of Law
43. Heidi Sanborn, MPA
44. Howard Hansen
45. Irena Gorski Steiner, MPH
46. James Kane
47. Janet McDonnell
48. Jen Packheiser
49. Jim Parks
50. Jodie Mussio, M.S.
51. John E. Vena, Ph.D., Professor,
Department of Public Health
Sciences, Medical University of
South Carolina
52. Judith Enck, former EPA Regional
Administrator and President of
Beyond Plastics
53. Karen Alanos
54. Karen C. Sokol, Professor of Law,
Loyola University New Orleans
College of Law
55. Karla K Chew
56. Kathryn Gredell
57. Kristine W Grady MS, CRNA
58. Laura Davis MBA
59. Linda Bonner
60. Madeleine Van Hecke, PhD
61. Margaret Shaklee, UUANI board
president
62. Marian Honel-Wilson
63. Mary Anne OToole
64. Mary Ellen McGoey
65. Mary Parks
66. Matthew Masiello, M.D., MPH.
Clinical Professor of Pediatrics
67. Megan Latshaw, PhD MHS,
Associate Scientist, Department of
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Bloomberg School of Public Health
68. Mona Hanna-Attisha MD MPH
FAAP, Founder and Director of
Michigan State University and
Hurley Children's Hospital Pediatric
Public Health Initiative
69. Monica E. Unseld, Ph.D, MPH
70. Mr. Joseph Romeo
71. Mrs. Dienna Drew
72. Mrs. Jean AR. McCollum, RD
73. Ms Laura BAsanta
74. Ms. Cathy R. Blanford

75. Ms. Faith P. Bailey
76. Ms. Karla Peterson
77. Ms. Margaret Galle
78. Myra Epping
79. Nancy G. Irons
80. Natalie Sampson, PhD, MPH,
University of Michigan-Dearborn
81. Pamela Berg, MPH
82. Pamela k Sartori
83. Patricia Ghysels
84. Paulette Lucas
85. Penny Robinson, Steering
Committee Member, Coalition for
More Responsible Transportation
86. Rebecca Parkin, MPH, PhD,
Professorial Lecturer, The George
Washington University
87. Rev. Allen Harden
88. Rev. Colleen Vahey
89. Rev. Dr. William Sasso
90. Rev. Eileen Wiviott
91. Rev. Pamela Rumancik
92. Rev. Sarah C. Richards
93. Richard Crume, Urban Health
Consultant
94. Richard Pokorny
95. Robert Bulanda
96. Robert M. Gould, MD, President,
San Francisco Bay Area Chapter of
Physicians for Social Responsibility,
Associate Adjunct Professor,
Program on Reproductive Health and
the Environment, Department of
Obstetrics, Gynecology and
Reproductive Sciences, UCSF
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97. Robert S. Lawrence, MD, MACP,
Professor Emeritus, Environmental
Health & Engineering, Johns
Hopkins Bloomberg School of
Public Health
98. Robert W Bahrey
99. Roberta k Price
100. Roger M Masson, P.E.
101. Ruth A Cook
102. Sally Milow, B.A. Washington
University, St. Louis
103. Shalanda H. Baker, Professor of
Law, Public Policy and Urban
Affairs
104. Shirley Lundin, concerned
individual
105. Steven Farber
106. Steven Serikaku
107. Susanna Lang
108. Tammy Murphy LL.M., Medical
Advocacy Director, Physicians for
Social Responsibility Pennsylvania
109. Tee L. Guidotti, MD, MPH, DABT
110. Teresa Heit-Murray
111. The Reverend James A. Hobart
112. Theodora Tsongas, PhD, MS
113. Tracy McLellan
114. Tran Huynh, PhD, CIH
115. Vicky Camarena
116. Virginia L Wilcox
117. Wanda Hoover
118. Wendy Wagner, Richard Dale
Endowed Chair, University of Texas
School of Law

CC: Members of the US Senate Committee on Environment and Public Works
Members of the US House of Representatives Committee on Energy and Commerce
Members of the US House of Representatives Committee on Natural Resources
Susan Bodine, Assistant Administrator for Enforcement and Compliance Assurance, US
Environmental Protection Agency
Mr. Richard Moore, Chair, National Environmental Justice Advisory Council
Members of the National Environmental Justice Advisory Council