

Wasting our Waterways

Toxic pollution and the unfulfilled promise of the Clean Water Act





FRONTIER GROUP

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Note (Oct. 2022): US Gypsum Co. in Baltimore, MD, has stated that it significantly overreported its releases to water in its reporting to the Toxics Release Inventory. The data in this report will be updated upon the posting of revised TRI release data for US Gypsum by the EPA.

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Executive summary

F ifty years ago, our nation came together to pass the federal Clean Water Act, with an ambitious goal of making all of America's waterways clean. Heralding a new era for America's rivers, lakes and streams, the Clean Water Act led to dramatic reductions in pollution and to the restoration of several waterways.

But a half-century later, the job of cleaning up America's waterways remains half-done. Many of our waterways still face major pollution threats – including industrial facilities that continue to release large volumes of toxic substances, threatening the health of people and ecosystems.

According to data from the U.S. Environmental Protection Agency's (EPA) Toxics Release Inventory (TRI), industrial facilities released at least **193.6 million pounds of toxic substances into U.S. waterways in 2020,** including chemicals known to cause cancer, reproductive problems and developmental issues in children. These high volumes stand in stark contrast to the Clean Water Act's stated objective of eliminating direct discharges of pollution by 1985.

To end this toxic threat to America's waterways, our nation should systematically reduce the use of toxic chemicals, and the EPA should update pollution control standards to effectively eliminate their direct release into our waterways wherever possible. More broadly, the federal government should ensure that rules and enforcement pursuant to the Clean Water Act are commensurate with its goals.

Industrial facilities dump toxics into waterways nationwide.

- Among major watershed regions nationwide, the Ohio River basin received the largest volume of toxic discharges by weight in 2020, followed by the South Atlantic-Gulf, and Mid-Atlantic watershed regions. (See Figure ES-1, next page.)
- Industrial and government facilities released toxic substances into 844 local watersheds nationwide

 representing about one in every three local watersheds in the U.S.¹ The Lower Ohio-Little Pigeon watershed in Indiana and Kentucky, the Upper New River watershed in North Carolina, Tennessee and Virginia, and the Brandywine-Christina watershed in Delaware, Maryland and Pennsylvania received the largest amounts of toxic chemical discharges by weight in 2020. (See Table ES-1, next page.)
- Texas, Indiana and Virginia ranked highest in the nation for toxic chemical discharges to water by weight in 2020. (See Table ES-2, next page.)
- Nitrate compounds accounted for more than 90% of all toxic releases by weight, with animal processing plants and petroleum refiners representing the largest sources of nitrates. Nitrates are not only dangerous to human health, but they also contribute to the formation of oxygen-depleted "dead zones" in waterways such as the Gulf of Mexico that harm wildlife.

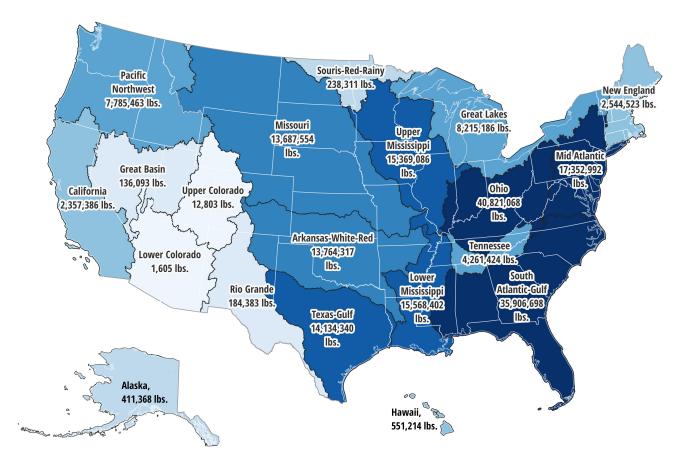


Figure ES-1. Toxic releases to watershed regions nationwide, 2020

TABLE ES-1. TOP FIVE LOCAL WATERSHEDS2 BYTOXIC SUBSTANCES RELEASED, 2020

| Receiving watershed | State(s) containing watershed | Toxics released (lbs.) |
|--------------------------|-------------------------------------|---------------------------|
| Lower Ohio-Little Pigeon | IN, KY | 12,008,366 |
| Upper New | NC, TN, VA | 10,266,141 |
| Brandywine-Christina | DE, MD, PA | 6,191,362 |
| Lower Cape Fear | NC | 5,017,810 |
| Muskingum | OH | 4,640,523 |

TABLE ES-2. TOP FIVE STATES BY TOXICSUBSTANCES RELEASED, 2020

| State or territory | Toxics released (lbs.) | |
|--------------------|------------------------|--|
| Texas | 16,778,747 | |
| Indiana | 14,085,748 | |
| Virginia | 12,218,174 | |
| Louisiana | 11,378,399 | |
| Alabama | 10,173,322 | |

About the data

The EPA's Toxics Release Inventory (TRI) is the nation's most comprehensive source of data on the release of specific toxic substances to waterways. However, TRI data captures only a portion of the toxic pollution released to waterways by industrial facilities, meaning that the amount of toxic substances released to waterways by industrial facilities is likely significantly higher than reported here. Among the releases excluded from TRI reporting are the following:

- Releases from industries exempt from reporting. Oil and gas extraction, for example, have historically been exempt from reporting under TRI (though reporting for natural gas processing facilities will be required starting in 2023).³
- Releases of toxic substances that have not yet been added to the list of reportable chemicals. (For example, reporting for releases of some PFAS was only required as recently as 2020, and is still not required for the vast majority of these "forever chemicals.")
- Releases from facilities with fewer than 10 full-time employees or that do not meet minimum thresholds for the amount of a substance manufactured, processed or otherwise used at a facility.⁴
- Releases that fall under various other exemptions in the law, such as the *de minimis* exemption that allows facilities to avoid counting some chemicals present in low concentrations in products when determining whether they are required to report under the law.⁵

Some waterways receive particularly large discharges of chemicals with potent effects on human health.

- Wisconsin, Texas and Virginia were the three states with the largest toxicity-weighted releases of chemicals by industrial and government facilities in 2020.
- The Ohio River, Great Lakes and Texas-Gulf watershed regions had the largest releases of chemicals weighted by toxicity.

Many chemicals discharged into American waterways have been linked to severe health problems.

- Cancer: Just over 1 million pounds of toxic chemicals linked to cancer were released to waterways across America in 2020. More cancer-causing chemicals were released into the waters of South Carolina, Texas and Alabama than any other states in 2020, and the Austin-Oyster watershed in Texas, the Cooper watershed in South Carolina, and the Racoon-Symmes watershed in Kentucky, Ohio and West Virginia received the most cancer-causing toxics among local watersheds. The industries that released the most cancer-causing toxics were paper and pulp mills.
- Reproductive effects: Over 200,000 pounds of chemicals that potentially cause reproductive problems were released in 2020, with Texas, Indiana and Pennsylvania waterways receiving the greatest amount of reproductive toxics. The Middle Wabash-Little Vermilion watershed in Illinois and Indiana ranked first with more than 13,000 pounds of chemical releases tied to reproductive toxicity, followed by the Lehigh watershed in Pennsylvania and the Upper San Antonio watershed in Texas. The industries that discharged the most reproductive toxics into water were fossil fuel power plants and iron and steel mills.
- Developmental effects: Over 4.5 million pounds of chemicals with the potential to affect the healthy development of fetuses and children were released into American waterways in 2020. North Carolina, Wisconsin and Alabama were the states with the

largest releases of developmental toxics, with the Castle Rock watershed in Wisconsin, the Middle Neuse watershed in North Carolina and the Lower Alabama watershed in Alabama receiving the greatest amount of developmental toxic releases. Pulp, paper and paperboard mills were the largest releasers of developmental toxics.

Releases of a small number of "forever chemicals" known as PFAS were reported to the Toxics Release Inventory for the first time in 2020, though the true volume of PFAS releases is likely much higher.

- For the first time in 2020, industrial polluters were required to report their releases of certain per- and polyfluoroalkyl substances (PFAS) chemicals that have been linked to kidney cancer, thyroid disruption and other health problems. PFAS are toxic at extremely low doses health advocates have recommended limits on PFAS in drinking water of *1 part per trillion*, equivalent to just one drop of water in 20 Olympic-sized swimming pools and PFAS chemicals persist in the environment over time.⁶
- Industrial polluters reported releasing at least 440 pounds of PFAS to waterways in 2020. However, given that the 2020 TRI reporting only included 172 out of more than 12,000 types of PFAS, and likely omits many facilities that use or release PFAS, this figure likely dramatically understates the amount of PFAS pollution.⁷ The EPA is currently planning to update TRI reporting rules and pollution control standards for at least some industries discharging PFAS to waterways.⁸

To further the promise of the Clean Water Act, and to protect our rivers, lakes, streams and bays from toxic pollution, policymakers should take the following actions:

• The EPA should move quickly to update pollution control standards in order to end or at least dramatically reduce toxic releases into our waterways. This includes standards for meat and poultry processing plants, power plants, and all industrial dischargers of PFAS chemicals.

- Officials should require industrial facilities to remove toxics from the wastewater they send to sewage treatment plants (otherwise known as publicly owned treatment works, or POTWs) that are unable to be removed by those plants and may be discharged into waterways. These "indirect discharges" of industrial toxic chemicals are significant and have the potential to affect the environment and health.
- The EPA should eliminate the *de minimis* exemption for PFAS chemicals, which likely results in PFAS releases being underreported to TRI.⁹ Similarly, Congress and the EPA should continue to expand the scope of reporting to TRI and ensure that reports of toxic releases under the program are complete and accurate.
- Federal and state officials, as well as product manufacturers, should dramatically restrict the use of PFAS and other toxic chemicals, especially where safer alternatives already exist.
- EPA and state officials should ensure that facilities that use or store large quantities of toxic material are not permitted near our waterways, reducing the threat of large-scale spills of toxics into waterways that cause immediate and long-term harm.
- Congress should provide the EPA with sufficient funding to ensure rigorous and timely review and vigorous enforcement of water pollution permits.
- State and federal officials should ratchet down toxic pollution limits in clean water permits, especially where a facility is discharging into a waterway already polluted with toxic substances.
- The federal government should confirm that all of America's wetlands, streams and other waters are protected from toxic pollution by the Clean Water Act.
- State and federal officials should move beyond voluntary incentives to dramatically curb the flow of toxic pollutants from non-point sources, especially runoff of nitrates and pesticides from industrial agribusiness operations.

Introduction

he 1972 passage of the federal Clean Water Act marked a watershed moment in American history. No longer, Congress signaled, would polluters be able to use the nation's rivers, streams, lakes and ocean waters as their dumping grounds. Instead, the nation would work toward a goal of making the nation's waterways safe for fishing and swimming within roughly a decade wherever possible.¹⁰ Further, Congress declared that "it is the national policy that the discharge of toxic pollutants in toxic amounts be prohibited."¹¹

Fifty years later, the Clean Water Act has played a critical role in restoring America's waterways to health. According to one study, the number of waterways safe for fishing increased by 12% during the law's first three decades.¹²

To limit industrial pollution, the Clean Water Act created the National Pollution Discharge Elimination System (NPDES), through which permits are issued limiting the pollution that facilities can release to waterways. The act also required the EPA to set technology-based limits on pollutant discharges from industrial facilities and to update those limits as technology improves – ensuring that the nation is using every practicable tool in its toolbox to keep industrial pollution out of our waterways.¹³

In the decades that followed passage of the law, state and federal officials also came to realize that stopping pollution at the end of the pipe was not always the best – nor the only – approach to protecting our waterways. Truly protecting the environment and public health – including from accidental releases and spills of toxic chemicals – required that communities be informed about the toxic threats in their midst and that industrial facilities adopt safer alternatives to the most dangerous substances. States such as Massachusetts, New Jersey and Oregon adopted pollution prevention laws that aimed to reduce industrial use of toxic chemicals and encourage safer alternatives.¹⁴ And in 1986, Congress enacted the Emergency Planning and Community Right to Know Act, which, among other things, required many industrial facilities to report their releases of toxic substances to the environment via the Toxics Release Inventory (TRI).¹⁵

Despite five decades of progress, however, pollution problems continue to threaten our waterways, including the direct release of toxic substances to rivers, streams and lakes. While the nation has reduced industrial pollution since the early 1970s, polluters continue to dump large volumes of toxic substances – including highly toxic chemicals such as PFAS – directly into waterways.

In this report – our fourth such report since 2009 – we review federal data on discharges of toxic chemicals to waterways. This data, from the TRI, does not tell the full story of the impact of toxics on our health and environment, since not all releases of all dangerous chemicals by all facilities are covered under TRI, and a great deal of toxic pollution comes from sources other than industrial facilities. There is still much we do not know.

But what we do know about toxic releases to our waterways is more than enough to conclude that the mission of the Clean Water Act is far from accomplished. At a time when powerful interests are pushing to limit the reach of the law, the data in this report shows that the nation should instead mark the 50th anniversary of the Clean Water Act by recommitting to its goals of swimmable, fishable waters for all and an end to the dumping of toxic chemicals that threaten our health and our environment.

Toxic releases to waterways threaten public health and the environment

ndustrial facilities across America routinely release toxic chemicals into the air, land and water. While chemical pollution is regulated and monitored in a variety of ways, in many cases it is legal, despite posing major threats to people and ecosystems.

Dangers to public health

Industrial facilities across the country release toxic substances to our waterways that have been linked to an array of serious health problems, from cancer, fertility problems and developmental problems to damage to the heart, cardiovascular system, brain, eyes, kidneys, liver and more.¹⁶

People can be exposed to many of these chemicals when they swim in the water or eat fish that have absorbed the chemicals. Many chemicals pose a threat to drinking water as well.¹⁷

Damage to the environment

Beyond effects on human health, toxics in water can damage wildlife, and the problem of chemical damage to water ecosystems is widespread in the United States. Among rivers and streams across the country that have been assessed for their health, roughly half still remain too polluted to support fishing, swimming, healthy aquatic habitats or use as drinking water.¹⁸

Toxic chemicals can shorten the lives of fish and other aquatic lifeforms, interfere with their mating and reproduction, disrupt their hormone systems, change their sex characteristics or kill them outright.¹⁹ In addition, some chemicals that are toxic to humans – such as nitrates – can contribute to environmental problems in other ways. Nitrates contribute to the formation of "dead zones" – areas where nutrient-fueled growth of algae leads to reduced oxygen levels in the water that make it inhospitable to wildlife.²⁰

Toxic substances released to U.S. waterways in 2020

his report uses data from the U.S. Environmental Protection Agency's (EPA) Toxics Release Inventory (TRI) to quantify releases of toxic substances from industrial facilities to U.S. waterways in 2020, the most recent year of complete data available. This is the fourth report in a series: previous editions were published in 2009, 2012 and 2014.

TRI tracks the release of more than 800 toxic substances and categories of toxic substances to the environment.²¹ TRI does not capture all toxic releases - releases of harmful chemicals that have not been fully studied or tested for their impacts on the environment or human health, for example, are excluded.²² Additionally, only certain types of facilities are required to report to TRI. Generally, facilities involved in manufacturing, mining, electricity generation, chemical manufacturing or hazardous waste treatment, or federal facilities (such as military facilities) must report.²³ But facilities in other industries that likely produce significant amounts of toxic pollution - such as oil and gas extraction facilities - are exempt from TRI (though releases from natural gas processing facilities are reportable beginning in reporting year 2022).²⁴ Reporting is also limited to facilities that have over 10 employees and that produce or process TRIlisted chemicals above a certain threshold amount each year.25

Toxic chemicals from industrial facilities may also reach waterways either via "direct discharges" (e.g., pollution from a pipe leading directly from a facility to a waterway) or "indirect discharges" to sewage systems. While "indirect discharges" to publicly owned treatment works (POTWs) are reportable to TRI, releases from the receiving POTWs to waterways are not and are therefore excluded from the totals presented in this report.

Because TRI is limited in the scope of the chemicals it covers and the facilities that are required to report, the data presented here is likely a significant undercount of the amount of toxics being released into our waterways. Despite those shortcomings, TRI still represents the most comprehensive, reliable and up-to-date dataset available quantifying releases of specific toxic substances to the environment, and TRI data provides important information about the sources of toxic pollution in our waterways.

In this report, TRI data is broken down in a number of ways:

- By total pounds and "toxicity-weighted pounds equivalent" of chemicals released;
- By links to certain human health effects, namely cancer, reproductive effects and developmental effects; and
- By state, facility, watershed, industry and chemical.

What are watersheds and why do they matter?

The EPA defines a watershed as the "area that drains to a common waterway."²⁶ Watersheds are defined at many geographic scales, from the area around a small creek to the entire catchment area of continental-scale waterways like the Ohio or Colorado rivers.

When many facilities dump chemicals into smaller waterways that all drain into a major river, the cumulative effect of those releases can be dramatic, as is the case in the Gulf of Mexico, which each year experiences a "dead zone" of thousands of square miles due to pollutants draining from the many rivers and streams that feed the Mississippi River.²⁷

Every local watershed is fully encompassed within a greater watershed. These levels of drainage - from large to small - are divided by the United States Geological Survey (USGS) into "hydrologic units," each of which is assigned a numeric "hydrologic unit code" (HUC) of varying length, from two to 16 digits.²⁸ Large watershed regions are signified by two-digit codes, with each successively smaller level of watershed further defined by the addition of digits to the code. For example, the Ohio River watershed region - the entire area drained by the Ohio River to its confluence with the Mississippi - is signified by HUC2 code "05," while the portion of the watershed region between Pittsburgh and the confluence with West Virginia's Kanawha River is designated as the "Upper Ohio" subregion, with HUC4 code "0503." The Little Kanawha local

watershed, located within the "Upper Ohio" subregion, has the HUC8 code "05030203." And so on. (See Figure 1 below.)

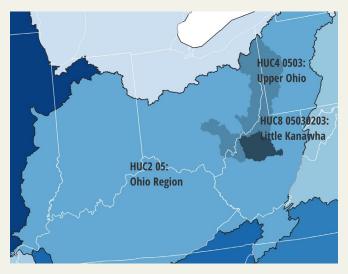


Figure 1. Illustration of watershed levels as described by USGS hydrologic unit codes

HUCs do not always meet the literal definition of "watersheds" (as they don't always include upstream waters in other HUCs that feed into them). In this report, however, we will refer to HUC2 areas as "watershed regions" and HUC8 areas as "local watersheds" or simply "watersheds."²⁹ By reviewing toxic releases at these two levels, readers can get a sense of the potential impact of toxic releases on local waterways with which they are familiar, as well as the largescale impact of toxic releases on America's waterways.

Industrial facilities dumped 194 million pounds of toxics into U.S. waterways in 2020

At least 193.6 million pounds of toxic substances were released to 844 local watersheds by industrial and government facilities in 2020.³⁰ Toxic releases were widespread, affecting more than one out of every three watersheds nationwide, as well as all 50 states, Puerto Rico, Guam, the Virgin Islands and Washington, D.C.³¹

Releases by state

Texas was the state with the greatest amount of toxic substances released by weight in 2020, at nearly 17 million pounds, followed by Indiana and Virginia. (See Table 1.)

TABLE 1. TOP 10 STATES BY TOTAL RELEASESOF TOXIC SUBSTANCES, 2020

| State or territory | Toxics released (lbs.) |
|--------------------|------------------------|
| Texas | 16,778,747 |
| Indiana | 14,085,748 |
| Virginia | 12,218,174 |
| Louisiana | 11,378,399 |
| Alabama | 10,173,322 |
| North Carolina | 9,746,239 |
| Mississippi | 9,111,172 |
| Ohio | 7,497,207 |
| Kentucky | 7,162,639 |
| Illinois | 7,140,443 |

Not every chemical is equally toxic, however. To facilitate comparisons and evaluate the hazards posed by the release of toxic chemicals, the EPA developed the Risk-Screening Environmental Indicators (RSEI) tool, which assigns weights to chemical releases reported under TRI based on their toxicity to humans.³² The RSEI Hazard metric uses "toxicity-weighted pounds equivalent" (TWPE) as the metric for this comparison. In addition, the EPA calculates a "RSEI Score" for each release based not only on the chemical's toxicity but also on its likely fate in the environment and potential routes of public exposure. Neither the RSEI Hazard nor the RSEI Score metrics reflect a chemical's toxicity to the environment or to wildlife, an important consideration for environmental protection.

In this report, we use the RSEI Hazard metric and TWPE to compare the toxicity to humans of chemical releases reported under TRI. (See text box on next page for comparison of leading facilities by RSEI Score.)

Wisconsin had the largest toxicity-weighted releases of toxic substances (as measured by the RSEI Hazard indicator) in 2020, followed by Texas and Virginia. (See Table 2.)

TABLE 2. TOP 10 STATES BY TOXICITY-WEIGHTED CHEMICALS RELEASED, 2020

| State or territory | Toxicity-weighted chemicals released (lbs. eq.) | |
|--------------------|---|--|
| Wisconsin | 45,122,237,956 | |
| Texas | 39,673,055,922 | |
| Virginia | 31,982,111,294 | |
| Louisiana | 10,853,487,483 | |
| Indiana | 7,319,010,165 | |
| West Virginia | 4,832,813,087 | |
| Ohio | 3,441,960,029 | |
| South Carolina | 1,856,799,384 | |
| Pennsylvania | 1,670,004,499 | |
| Alabama | 1,667,496,165 | |

Releases by local watershed

Among watersheds, the Lower Ohio-Little Pigeon watershed in Indiana and Kentucky saw the greatest amount of toxics released into its waters in 2020, at 12 million pounds, followed by the Upper New River watershed in North Carolina, Tennessee and Virginia, and the Brandywine-Christina watershed in Delaware, Maryland and Pennsylvania. (See Table 4, page 11.) Most of the discharges into the Lower Ohio-Little Pigeon watershed were in the form of nitrate releases to the Ohio River from the Cleveland-Cliffs Rockport Works steel plant in Rockport, Indiana, which released nearly 11 million tons of nitrates to the river. Nitrates are a form

Top facilities for toxic discharges as ranked by RSEI Score

This report uses RSEI's toxicity-weighted pounds equivalent (TWPE) measure – known as the **RSEI Hazard** indicator – to compare the toxicity of releases to waterways across the country. Another window on the dangers posed by toxic chemical releases is the **RSEI Score**, which factors in not only the toxicity of the chemicals released, but also their fate in the environment and potential for human exposure.

Table 3 below lists the top 10 facilities in the U.S. for toxic releases to water by RSEI Score. The U.S. Army Radford ammunition plant ranks first in the nation for the likely impact of its toxic releases.

The facility releases nitroglycerin, copper, lead and nitrates into the New River in southwestern Virginia. The New River in the vicinity of the plant is listed as impaired for recreation and fish consumption, in part due to PCB contamination of fish resulting from industrial pollution from sources including the ammunition plant.³³ The facility has frequently been in violation of the Clean Water Act, with violations occurring in five of the 12 calendar quarters between April 2019 and December 2021, and significant non-compliance occurring in one of those quarters.³⁴ The plant exceeded its permitted levels of toxic discharge during several quarters of that period.³⁵

TRI Facility Name State **Industry Sector RSEI Score** U.S. Army Radford Army Ammunition Plant 2,363,831 Virginia Other Chemours - Starke Facility Florida Metal Mining 1,236,037 Kennecott Utah Copper Mine Concentrators & Power Plant Utah Metal Mining 698,753 Nonmetallic Mineral Product Holcim (US) Inc. - Whitehall Plant Pennsylvania 520,242 APC Polytech LLC 417,791 West Virginia Chemicals Nucor Steel Marion Inc. Ohio **Primary Metals** 412,506 370,563 Duke Energy Carolinas LLC - Marshall Steam Station North Carolina **Electric Utilities** Chemicals Arch Wood Protection Inc. 224,664 Georgia Duke Energy Indiana Inc. - Cayuga Generating Station Indiana **Electric Utilities** 220.327 **Calaveras Power Station Electric Utilities** 169,674 Texas

TABLE 3. TOP FACILITIES FOR TOXIC RELEASES TO WATER AS MEASURED BY RSEI SCORE³⁶

of nutrient pollution blamed for oxygen depletion and toxic algae blooms such as those that have afflicted the Ohio River with increasing frequency in recent years.³⁷ The state of Indiana also ranks as the third-largest contributor among states of nitrogen to the Mississippi and Atchafalaya river basins, which feed the nutrient-fueled "dead zone" in the Gulf of Mexico.³⁸

TABLE 4. TOP 10 WATERSHEDS BY TOTALRELEASE OF TOXIC SUBSTANCES, 2020

| Receiving watershed | State(s) containing watershed | Toxics released (lbs.) |
|--------------------------|-------------------------------------|---------------------------|
| Lower Ohio-Little Pigeon | IN, KY | 12,008,366 |
| Upper New | NC, TN, VA | 10,266,141 |
| Brandywine-Christina | DE, MD, PA | 6,191,362 |
| Lower Cape Fear | NC | 5,017,810 |
| Muskingum | ОН | 4,640,523 |
| Lower Big Sioux | IA, MN, NE, SD | 4,507,539 |
| Lake Walcott | ID | 3,866,978 |
| Buffalo-San Jacinto | ТХ | 3,784,822 |
| Middle Ohio-Laughery | IN, KY, OH | 3,524,720 |
| Lower Rock | IL, WI | 3,069,016 |

When weighted for toxicity, the Manitowoc-Sheboygan watershed in Wisconsin ranked first in the country for toxicity-weighted pounds-equivalent of chemicals released, followed by the Austin-Oyster watershed in Texas and the Upper New watershed in North Carolina, Tennessee and Virginia (see Table 5). NextEra Energy's Point Beach nuclear power plant was responsible for the vast majority of toxicity-weighted releases to water in the Manitowoc-Sheboygan watershed as a result of its releases of hydrazine to Lake Michigan. Hydrazine is a probable human carcinogen.³⁹

TABLE 5. TOP 10 WATERSHEDS BY TOXICITY-WEIGHTED CHEMICALS RELEASED, 2020

| Receiving watershed | State(s) containing watershed | Toxicity-weighted chemicals released (lbs. eq.) |
|-----------------------------------|-------------------------------------|---|
| Manitowoc-Sheboygan | WI | 45,021,201,876 |
| Austin-Oyster | ТХ | 38,320,027,272 |
| Upper New | NC, TN, VA | 31,725,710,405 |
| Lake Maurepas | LA | 8,889,410,342 |
| Middle Wabash-Little Vermilion | IL, IN | 6,188,334,032 |
| Raccoon-Symmes | KY, OH, WV | 4,442,261,040 |
| Upper Ohio-Wheeling | OH, PA, WV | 1,684,294,112 |
| Jordan | UT | 1,466,638,353 |
| Cooper | SC | 1,463,567,312 |
| Upper Ocmulgee | GA | 1,020,772,866 |

Individual polluters can account for a large share of releases in local waterways

The top three local watersheds by toxicity-weighted chemicals released in 2020 each received more than 99.9% of their toxicity-weighted chemical pollution from a single facility, indicating the outsized impact one polluter can have on a watershed.

The Austin-Oyster watershed in Texas, which had the second largest amount of toxicity-weighted chemical releases in 2020, had nearly all of its toxic pollution come from the Dow Chemical Co. Freeport chemical manufacturing plant, which released 31 different chemicals into the tidal portion of the Brazos River in 2020. These included chemicals that cause cancer, developmental harm, kidney damage, liver damage and respiratory damage, among others, and included wellknown and highly toxic pollutants like lead, chloroform and dioxin-like compounds. The Freeport facility has

Nitrate compounds composed the bulk of chemicals released to waterways in 2020

As they have for years, nitrate compounds formed the bulk of the toxics released to water in 2020.⁴⁰ In 2020, nitrate compounds made up just under 91% by weight of all the chemicals released to water reported to TRI. And, although nitrates are much less toxic pound-for-pound than many other chemicals TRI tracks, they can cause serious health and environmental problems.⁴¹ Nitrate compounds are known to have developmental effects and effects on the blood, as well as to cause spontaneous abortions and birth defects.⁴² One possible effect of nitrate exposure is blood oxygen deprivation, known as "blue baby syndrome" in infants, which can be fatal.⁴³ A 2021 analysis by Environmental Working Group found that the drinking water supplies serving roughly 60 million Americans were contaminated with elevated levels of nitrates.⁴⁴

When nitrates enter aquatic environments like lakes, rivers and oceans, they can cause algae

been a frequent violator of the terms of its Clean Water Act permits. The facility was in significant non-compliance with the Clean Water Act for two of the previous 12 calendar quarters ending March 31, 2022, and was found in violation of the act in four other quarters during that span.⁴⁸

The U.S. Army ammunition plant in Radford, Virginia, was the primary source of toxic releases in the Upper New River watershed in 2020. The facility released nearly 32 billion toxicity-weighted pounds equivalent of nitroglycerin, plus lead and nitrate compounds, into the Upper New River watershed in 2020. That facility blooms that can lead to oxygen deprivation in the ecosystem, killing fish and other animals.⁴⁵ Nitrates are one of the main drivers of the annual "dead zone" in the Gulf of Mexico and, though much of that nitrate pollution comes from fertilizer runoff and atmospheric deposition of nitrates caused by burning fossil fuels, wastewater treatment plants and animal manure from large livestock operations are also major sources.⁴⁶

Watershed regions including or feeding the Mississippi River received 94.5 million pounds of nitrate releases from facilities reporting to TRI in 2020, accounting for nearly half of all reported toxic releases in the country.⁴⁷ Animal slaughterhouses and processing facilities released more than 30 million pounds of nitrate compounds in watersheds feeding the Mississippi – contributing to the nutrient pollution problem in the Mississippi basin and the Gulf.

accounted for just about all of the toxicity-weighted pollution reported to TRI in the Upper New River watershed, which is spread between North Carolina, Tennessee and Virginia. The facility was in significant non-compliance with the Clean Water Act in two of the 12 quarters ending March 31, 2022, and was found in violation of the act in four other quarters, including two quarters in which the facility exceeded its limits for the total toxicity of its discharges.⁴⁹ The state of Virginia has assessed segments of the New River that receive discharges from the plant as too polluted for fishing and recreation due to the presence of toxic PCBs and pathogens.⁵⁰

Releases of toxic chemicals harm already-polluted waterways

Under the Clean Water Act, states, territories and tribes must set water quality standards for all water bodies within their borders based on the designated use of those waterbodies.⁵¹ When those standards are not met, the waterway is called "impaired." For example, when a river has levels of toxic pollution that would make the fish unsafe to eat, that river would be deemed impaired – or too polluted – for fishing.

When a waterway is impaired, the Clean Water Act requires states to make a plan for its protection and restoration.⁵² These plans involve maximum daily pollution limits (called "total maximum daily loads," or TMDLs) for the pollutants being released into the waterbody.⁵³ Polluters along the waterway are assigned discharge limits and required to reduce their pollution in order to bring the concentration of pollutants in the waterway down to levels sufficient to allow the waterway to support its designated uses.

TRI data shows that many of these already polluted waterways continue to receive significant discharges of toxics - making it more difficult to restore them to health. For instance, the Wabash River in Indiana is impaired for aquatic life, human health and swimming.⁵⁴ A remediation plan for the mainstem of the Wabash River was finalized in 2006 for a variety of pollutants, including nitrates, yet the waterway remains impaired.⁵⁵ Despite that, in 2020, eight different facilities released approximately 371,000 pounds of toxics, including nitrate compounds, lead, chromium compounds, arsenic compounds and chlorobenzene into the Wabash River. Continued discharge of toxic pollutants to the Wabash and other waterways hinders long-running efforts to restore those waterways to health.

Major river systems aggregate pollution from smaller waterways

For large waterways, reported discharges directly into the waterway are an incomplete picture of the pollution burden they carry. Rivers collect water – and pollutants – from their smaller tributary rivers and streams. While some pollutants degrade and others settle out of the water or are absorbed by plants or animals, some amount of toxic substances dumped into smaller streams flow into our larger rivers, lakes and bays.

The USGS uses HUC2 codes – two-digit hydrologic unit codes – to describe regions, or major watersheds of the country.⁵⁶ These regions can stretch over hundreds of thousands of square miles and can aggregate the water – and pollutants – from many smaller watersheds within them.⁵⁷ Examining pollution at the watershed region level provides a view into how toxics in local watersheds can affect people and ecosystems far away.

In 2020, the Ohio River watershed region received the largest amount of toxic substances reported to TRI at just under 41 million pounds, followed by the South Atlantic-Gulf region at just under 36 million pounds and the Mid-Atlantic region at over 17 million pounds. (See Table 6, next page.) When weighting chemical releases for toxicity, the Ohio watershed region still faced the greatest pollution burden, followed by the Great Lakes region, and the Texas-Gulf region.

Industrial facilities release dangerous toxics that persist in the environment

As previously stated, different chemicals pose different levels of threat to human health and the environment. Among the most harmful substances are persistent bioaccumulative toxics (PBTs) which the EPA describes as chemicals that "remain in the environment for long periods of time, are not readily destroyed, and build up or accumulate in body tissue."⁵⁸ The persistence of PBTs in the environment also creates a long-term legacy of contamination that will affect people and the environment for years to come.

Sixteen individual PBTs and five PBT chemical categories are covered by TRI reporting requirements as of

TABLE 6. TOTAL AND TOXICITY-WEIGHTED SUBSTANCES RELEASED BY HUC2 WATERSHED REGION, 2020

| Region | Toxic substances released (lbs.) | Toxicity-weighted substances released (lbs. eq.) |
|----------------------|----------------------------------|--|
| Ohio | 40,821,068 | 48,459,632,733 |
| Great Lakes | 8,215,186 | 46,538,959,472 |
| Texas-Gulf | 14,134,340 | 39,673,603,357 |
| Lower Mississippi | 15,568,402 | 11,051,008,817 |
| South Atlantic-Gulf | 35,906,698 | 6,395,148,273 |
| Tennessee River | 4,261,424 | 1,991,000,994 |
| Great Basin | 136,093 | 1,576,267,267 |
| Upper Mississippi | 15,369,086 | 1,498,377,115 |
| Mid-Atlantic | 17,352,992 | 1,241,351,404 |
| Pacific Northwest | 7,785,463 | 834,625,739 |
| Arkansas-White-Red | 13,764,317 | 453,066,471 |
| Souris-Red-Rainy | 238,311 | 163,461,852 |
| New England | 2,544,523 | 153,781,238 |
| Alaska | 411,368 | 117,828,559 |
| Missouri River | 13,687,554 | 71,020,769 |
| California | 2,357,386 | 26,970,138 |
| Caribbean | 59,744 | 23,379,681 |
| Lower Colorado River | 1,605 | 9,831,680 |
| Rio Grande | 184,383 | 1,263,193 |
| Hawaii | 551,214 | 881,528 |
| Upper Colorado River | 12,803 | 630,481 |

mid-2022 – including dioxin, lead and mercury. Because PBTs are particularly harmful even in small amounts, reporting thresholds for PBTs are more stringent than for other toxics covered by TRI.⁵⁹ In addition, PFAS chemicals, while not categorized as PBTs for TRI reporting purposes, persist in the environment and many are also bioaccumulative.⁶⁰

The nature of PBTs is such that they accumulate over time and can move through the environment. One example of this is mercury and mercury compounds, which can enter the environment when emitted from coal-fired power plants, waste incinerators, or from factories, mines or water treatment facilities that release mercury to air or water.⁶¹ As it moves through the environment, mercury can combine or be combined with other elements, forming mercury compounds.⁶² One particularly toxic form, methylmercury, often builds up in fish and shellfish and can be very dangerous to humans when they consume seafood, in particular damaging the brains and nervous systems of fetuses in the womb.⁶³

Releases of PBTs to waterways were common across the U.S. in 2020.⁶⁴ TRI data reveals 2,181 reports of 14 different PBTs released to waterways in 49 states (all except South Dakota), Puerto Rico and the Virgin Islands. A total of 66,701 pounds of PBTs were released to water. Across the country, 1,492 different facilities reported releasing PBTs into our waters.

PFAS – the "forever chemicals"

Per- and polyfluoroalkyl substances (PFAS) are a class of over 12,000 chemicals that take a very long time to break down and, because they are widely used, are therefore found all over the world: in the air, water and soil, and in plants and animals – including humans.⁶⁵ PFAS are used in many everyday products: non-stick cookware, stain-resistant cloth and carpeting, firefighting foam and even cosmetics.⁶⁶ PFAS have been linked to altered metabolism, fertility problems, reduced fetal growth, accelerated puberty, bone changes, behavioral changes, increased risk of weight gain and obesity, cancers, immunosuppression, hormone disruption, diabetes, and reduced immune response to vaccines.⁶⁷

PFAS are dangerous because they are highly toxic and persistent, and many of them accumulate in the environment. In 2022, the EPA issued health advisories for a set of PFAS chemicals, finding that exposure to even miniscule amounts of certain PFAS can pose health risks over the course of a lifetime. For one chemical, the EPA estimated the amount of concentration in drinking water unlikely to cause health effects to be 4 parts per quadrillion, in effect finding no safe level of exposure.⁶⁸ Public health experts have suggested a cumulative standard for all PFAS in drinking water of 1 part per trillion, equivalent to just one drop of water in 20 Olympic-sized swimming pools.⁶⁹ Once released into the environment PFAS chemicals stay there. The National Institute of Environmental Health Sciences (NIEHS) reports that PFAS chemicals are so long-lived in the environment that scientists have been unable to determine their half-lives, or the time it takes for 50% of the material to break down.⁷⁰ PFAS contamination is also widespread - the Environmental Working Group has documented more than 2,800 locations in all 50 states where PFAS contamination has been detected and estimates that more than 200 million Americans could have PFAS in their drinking water.⁷¹

Many PFAS chemicals were exempt from reporting under TRI until 2020, when reporting was first required for releases of 172 PFAS chemicals.⁷² However, TRI data for releases of PFAS chemicals into water shows just 440.23 pounds of six PFAS chemicals released by four facilities in 2020.⁷³ These releases are troubling given the extreme toxicity of PFAS chemicals even in small quantities, but are likely only the tip of the iceberg.

In early 2022, three national advocacy organizations sued to force the EPA to investigate possible non-compliance with PFAS reporting requirements based on unexpectedly low numbers of facilities reporting PFAS use, unexpectedly low numbers of total PFAS chemicals used, and unexpectedly low amounts of PFAS released to the environment.⁷⁴ A study of 2020 TRI data on PFAS by the Natural Resources Defense Council (NRDC) found that only a small subset of known and used PFAS chemicals are covered by the TRI reporting requirements or labeled as PFAS under the TRI system, and that the reporting threshold of 100 pounds was high enough that many PFAS polluters don't have to report releases of the chemicals.⁷⁵ In addition, because PFAS are not classified by the EPA as PBTs, firms can exploit the de minimis loophole (see page 3) to avoid disclosure even if they would otherwise be required to report.76

The growing concern over PFAS in the environment reinforces both the importance of the public's right to know about releases of toxic chemicals to our waterways and our environment, and the need to ensure that releases of PFAS and other chemicals are reported under TRI. At the same time, the EPA and other agencies must take stronger action to protect the public from exposure to PFAS in the environment and consumer products.

Releases of toxics that cause human health problems are widespread

The chemicals tracked by the TRI program can cause a wide variety of human health problems. In this report, we focus on three types of health effects: cancer, reproductive harms and developmental damage.

Cancer

Cancer-causing chemicals harm human health when they find their way into the drinking water or food people consume. A 2019 study by researchers at Environmental Working Group estimated that carcinogens present in American tap water could lead to over 100,000 cancer cases following a lifetime of exposure. Investments in water treatment to remove those chemicals can be costly, making it imperative that carcinogens be kept out of waterways in the first place.⁷⁷

In 2020, over 1 million pounds of cancer-causing toxics were released into U.S. waterways. South Carolina, Texas and Alabama were the three states with the largest amounts of cancer-causing chemicals released, each with more than 100,000 pounds of releases. (See Table 7.)

TABLE 7. TOP 10 STATES BY CANCER-CAUSINGTOXIC CHEMICAL RELEASES, 2020

| State or territory | Cancer-causing chemicals released (lbs.) |
|--------------------|--|
| South Carolina | 130,579 |
| Texas | 123,257 |
| Alabama | 106,122 |
| Louisiana | 71,252 |
| West Virginia | 53,861 |
| Indiana | 52,207 |
| Georgia | 40,777 |
| North Carolina | 40,080 |
| Florida | 36,992 |
| Tennessee | 35,872 |

The Austin-Oyster watershed in Texas received the most cancer-causing chemicals of any local watershed in the U.S. at over 82,600 pounds, followed by the Cooper watershed in South Carolina at just under 59,000 pounds and the Racoon-Symmes watershed in Kentucky, Ohio and West Virginia at just under 44,600 pounds. (See Table 8.)

TABLE 8. TOP 20 LOCAL WATERSHEDS BY
CANCER-CAUSING TOXIC CHEMICAL RELEASES,
2020

| Receiving watershed | State(s) containing watershed | Cancer causing chemicals released (lbs.) |
|--------------------------------|-------------------------------------|--|
| Austin-Oyster | ТХ | 82,608 |
| Cooper | SC | 58,916 |
| Raccoon-Symmes | KY, OH, WV | 44,590 |
| North Fork Edisto | SC | 36,626 |
| Wheeler Lake | AL, TN | 29,895 |
| Little Calumet-Galien | IL, IN, MI | 29,691 |
| Carolina Coastal-Sampit | SC | 26,301 |
| St. Marys | FL, GA | 20,794 |
| Lower Roanoke | NC | 19,601 |
| Lower Tennessee-Beech | MS, TN | 19,001 |
| Middle Wabash-Little Vermilion | IL, IN | 16,771 |
| East Central Louisiana Coastal | LA | 16,374 |
| Lower Alabama | AL | 15,470 |
| Lower Calcasieu | LA | 15,247 |
| Lake Maurepas | LA | 15,051 |
| Manitowoc-Sheboygan | WI | 15,036 |
| Lower Columbia-Clatskanie | OR, WA | 14,919 |
| Lower Conecuh | AL, FL | 14,097 |
| Lake Champlain | Canada, NY, VT | 13,926 |
| Castle Rock | WI | 13,018 |

The industries with the largest releases of cancer-causing chemicals in 2020 were paper, pulp and paperboard mills, and the largest releases were of acetaldehyde.

Reproductive effects

Chemicals that have reproductive health effects may interfere with people's ability to have children. In 2020, more than 200,000 pounds of chemicals with reproductive toxicity were released into U.S. waterways. Texas had the largest amount of chemicals with reproductive effects released by facilities within its borders with over 28,000 pounds, followed by Indiana and Pennsylvania. (See Table 9.)

TABLE 9. TOP 10 STATES BY RELEASES OFREPRODUCTIVE TOXICS, 2020

| State or territory | Reproductive toxics released (lbs.) |
|--------------------|-------------------------------------|
| Texas | 28,333 |
| Indiana | 27,088 |
| Pennsylvania | 22,621 |
| Louisiana | 18,545 |
| Alabama | 12,194 |
| Tennessee | 10,723 |
| Illinois | 8,888 |
| Kentucky | 6,834 |
| West Virginia | 6,823 |
| Virginia | 6,785 |

The Middle Wabash-Little Vermilion watershed in Illinois and Indiana ranked first with more than 13,000 pounds of chemical releases tied to reproductive toxicity. Eight facilities in the Middle Wabash-Little Vermilion watershed reported releases of reproductive toxics to waterways in the basin, including compounds of lead, nickel and chromium. The Lehigh River watershed in Pennsylvania and the Upper San Antonio watershed in Texas ranked second and third for reproductive toxic releases. (See Table 10.)

TABLE 10. TOP 20 WATERSHEDS BY RELEASESOF REPRODUCTIVE TOXICS, 2020

| Receiving watershed | State(s) containing watershed | Reproductive toxics released (lbs.) |
|--------------------------------|-------------------------------------|---|
| Middle Wabash-Little Vermilion | IL, IN | 13,054 |
| Lehigh | PA | 9,687 |
| Upper San Antonio | ТХ | 9,219 |
| Lower Monongahela | PA, WV | 7,364 |
| Upper Ohio | OH, PA, WV | 6,592 |
| Little Calumet-Galien | IL, IN, MI | 6,585 |
| Austin-Oyster | ТХ | 6,096 |
| Middle Kansas | KS | 6,065 |
| Lake Maurepas | LA | 5,904 |
| Lower James | VA | 5,060 |
| Middle Ohio-Laughery | IN, KY, OH | 4,488 |
| Lower St. Johns | FL | 4,192 |
| Buffalo-San Jacinto | ТХ | 4,181 |
| Lower Calcasieu | LA | 3,997 |
| Peruque-Piasa | IL, MO | 3,532 |
| Lower Cumberland | KY, TN | 3,145 |
| Chicago | IL, IN | 3,045 |
| South Fork Holston | NC, TN, VA | 2,620 |
| Lower Columbia-Clatskanie | OR, WA | 2,472 |
| Lower Ohio-Little Pigeon | IN, KY | 2,219 |

The industries that released the most reproductive toxics in 2020 were fossil fuel power generation and iron and steel mills, and the chemicals with the highest releases were nickel compounds.

Developmental effects

Toxics that cause developmental effects interfere with the processes of growth and change of the body, from conception through the end of adolescence.⁷⁸ In 2020, over 4.5 million pounds developmental toxics were released by industrial and government facilities into our waterways. Facilities in North Carolina released the most developmental toxics, at just over 600,000 pounds, followed by Wisconsin and Alabama. (See Table 11.)

TABLE 11. TOP 10 STATES BY DEVELOPMENTALTOXICS RELEASED, 2020

| State or territory | Developmental toxics released (lbs.) |
|--------------------|--------------------------------------|
| North Carolina | 602,927 |
| Wisconsin | 595,112 |
| Alabama | 406,729 |
| Washington | 387,509 |
| Mississippi | 345,666 |
| South Carolina | 325,355 |
| Kentucky | 319,661 |
| Texas | 298,076 |
| Louisiana | 266,377 |
| Georgia | 189,610 |

The Castle Rock watershed in Wisconsin received the greatest amount of developmental toxicants, at 568,000 pounds, followed by the Middle Neuse watershed in North Carolina and the Lower Alabama watershed in Alabama. (See Table 12.) Three facilities reported releasing chemicals linked to developmental effects into the Wisconsin River in the Castle Rock watershed, with the greatest releases by weight in the form of methanol releases from the Verso Corp. (now Billerud) paper mill.⁷⁹ Other developmental toxics released in the watershed include compounds of lead and mercury.

TABLE 12. TOP 20 WATERSHEDS BYDEVELOPMENTAL TOXICS RELEASED, 2020

| Receiving watershed | State(s) containing watershed | Developmental toxics released (lbs.) |
|------------------------------|-------------------------------------|--|
| Castle Rock | WI | 568,103 |
| Middle Neuse | NC | 395,424 |
| Lower Alabama | AL | 320,140 |
| Bayou De Chien-Mayfield | KY, TN | 282,640 |
| Lower Yazoo | la, MS | 265,395 |
| Lower Chehalis | WA | 239,724 |
| Carolina Coastal-Sampit | SC | 232,234 |
| Buffalo-San Jacinto | ТХ | 178,372 |
| South Fork Holston | NC, TN, VA | 113,501 |
| Middle Columbia-Lake Wallula | OR, WA | 76,838 |
| Lower Neches | ТХ | 76,050 |
| Lower Columbia-Clatskanie | OR, WA | 75,878 |
| Middle Savannah | GA, SC | 74,239 |
| Cooper | SC | 61,542 |
| Lake Maurepas | LA | 61,041 |
| Bayou Pierre | LA, TX | 58,493 |
| Lower Chattahoochee | AL, FL, GA | 57,055 |
| Lower Cape Fear | NC | 56,467 |
| Upper Cape Fear | NC | 53,052 |
| Pigeon | NC, TN | 47,827 |

Recommendations

o further the promise of the Clean Water Act, and to protect our rivers, lakes, streams, and bays from toxic pollution, policymakers should take the following actions:

- The EPA should move quickly to update pollution control standards in order to end or at least dramatically reduce toxic releases into our waterways. This includes standards for meat and poultry processing plants, power plants and all industrial dischargers of PFAS chemicals.
- Officials should require industrial facilities to remove toxics from the wastewater they send to sewage treatment plants (otherwise known as publicly owned treatment works, or POTWs) that are unable to be removed by those plants and may be discharged into waterways. These "indirect discharges" of industrial toxic chemicals are significant and have the potential to affect the environment and health.
- The EPA should eliminate the *de minimis* exemption for PFAS chemicals, which likely results in PFAS releases being underreported to TRI.⁸⁰ Similarly, Congress and the EPA should continue to expand the scope of reporting to TRI and ensure that reports of toxic releases under the program are complete and accurate, ensuring that the public is fully informed about toxic discharges to our waterways.

- Federal and state officials, as well as product manufacturers, should dramatically restrict the use of PFAS and other toxic chemicals, especially where safer alternatives already exist.
- EPA and state officials should ensure that facilities that use or store large quantities of toxic material are not permitted near our waterways, reducing the threat of large-scale spills of toxics into waterways that cause immediate and long-term harm.
- Congress should provide the EPA with sufficient funding to ensure rigorous and timely review and vigorous enforcement of water pollution permits.
- State and federal officials should ratchet down toxic pollution limits in clean water permits, especially where a facility is discharging into a waterway already polluted with toxic substances.
- The federal government should confirm that all of America's wetlands, streams, and other waters are protected from toxic pollution by the Clean Water Act.
- State and federal officials should move beyond voluntary incentives to dramatically curb the flow of toxic pollutants from non-point sources, especially runoff of nitrates and pesticides from industrial agribusiness operations.

Methodology

his report estimates the discharges of toxic substances to waterways by weight using data from the EPA's Toxics Release Inventory (TRI) and the toxicity-weighted discharges using the EPA's Risk-Screening Environmental Indicators (RSEI) Hazard measure, communicated in toxic-weighted pounds equivalent (TWPE).

TRI is the most detailed and comprehensive source of data available about specific releases of toxics by industrial facilities, but it has several limitations. Not all industrial facilities are required to report to TRI, not all toxic substances are included in the program, and not all releases by facilities in industrial classifications covered by TRI are required to be disclosed. In addition, this report only includes direct releases of toxics to water; many facilities also release toxic chemicals to sewer systems, which then discharge into waterways. As a result, the data included in this report should be understood to reveal only a fraction of what is likely a much larger and more pervasive problem of toxic discharges to waterways.

TRI reported releases and RSEI toxicity weightings

Data on the release of toxics was downloaded from the Environmental Protection Agency's (EPA) Toxics Release Inventory (TRI) EZ Search tool using the "Chemical Discharge to Water" option on 3 May 2022 at https:// enviro.epa.gov/enviro/ez_column_v2.list?database_ type=TRI&table_name=V_TRI_WATER_EZ.⁸¹ Data was filtered to include only releases during 2020 (the most recent year available) and only releases for which "water" was the environmental medium, and then further filtered after download to include only those entries with a non-zero amount of chemicals released. Note that TRI data is frequently revised by reporting facilities and that revisions submitted after the date of download are generally not reflected in this analysis, with two exceptions, as detailed in notes 85 and 86.

Data on the Risk Screening Environmental Indicators (RSEI) Hazard toxicity-weighted releases was downloaded from the EPA's EasyRSEI Dashboard on 3 May 2022 at https://edap.epa.gov/public/extensions/EasyR-SEI/EasyRSEI.html. Data was downloaded using the "Custom Export Table" option on the Analysis tab and selecting only the RSEI data for modeled media and only for submission year 2020.

For reported releases of dioxin and dioxin-like compounds – which are so toxic as to have release amounts reported in grams rather than pounds – the release amount downloaded from TRI EZ Search was converted from grams to pounds to match the units of other chemical releases.

Releases of toxics as reported to TRI were then associated with the toxicity-weighted releases reported in the EasyRSEI dashboard. In cases in which there were multiple reports of the release of a single chemical from a facility, the duplicate records were eliminated, and the values for toxic releases in pounds and TWPE releases were trued up by multiplying the amount of toxic releases in pounds from the TRI EZ Search tool by the toxicity weight for that substance to arrive at the RSEI Hazard value for releases of that substance by that facility.

Health effects

Each toxic substance reported as released by a facility was then evaluated to determine if it was associated with cancer, developmental harm or reproductive toxicity. The health effects of the substances were primarily obtained from two datasets. The first was the EPA's TRI Toxics Tracker tool at https://edap.epa.gov/public/extensions/ TRIToxicsTracker/TRIToxicsTracker.html, downloaded on 10 May 2022. We used the "Potential Health Effects" option under the "Chemicals" tab, and selected all reporting years in the filter options. The other dataset was downloaded from California's Proposition 65 list of known harmful chemicals and their effects on 9 May 2022 at https://oehha.ca.gov/proposition-65/proposition-65-list. The Proposition 65 ("Prop 65") list had last been updated 25 February 2022 at the time of download. Health effects for chemicals indicated in the Prop 65 list as having been "delisted" or for which a given health effect was "removed" were excluded from the dataset.

The following rules were followed in assigning health effects to toxic substances:

- Chemicals listed as known to cause cancer, reproductive or developmental toxicity in the Prop 65 list were assigned those health effects.
- Toxic substances not listed as tied to a given health effect on the Prop 65 list, but that were tied to that effect on the EPA list, were evaluated further using the EPA's CompTox Chemicals Dashboard, which aggregates chemical warnings and toxicity determinations by authorities in Europe, Japan, Australia and other jurisdictions across the globe.⁸² Chemicals included on the EPA Toxics Tracker for a health effect that at least one other authority found "may cause" that health effect were included in the list used in this report. Substances listed by authorities as "suspected" of causing a health effect were not included.
- Releases of certain chemicals are reported to the EPA by class, instead of, or in addition to, reported releases of the individual substance, thus requiring a determination of whether the class of chemicals is linked to a particular health effect. Because different compounds within a class may have differing levels and forms of toxicity, because there is no way to distinguish among which

compounds in a class are being released, and because the EPA and Prop 65 lists are sometimes unclear as to which health effects are associated with particular chemicals, we applied the following rules in assigning health effects to chemicals and related chemical classes:

- If, in the Prop 65 list or other sources, health effects were associated with a substance *and its compounds*, those health effects were assumed to be associated with releases of the substance and its compounds as reported to TRI.
- If health effects in the Prop 65 list or other sources were associated with either a type of compounds as a class, or specific compounds of an element (usually a metal), but not specifically with the elemental form of the substance, those health effects were assumed to be associated with the "[ELEMENT] and [ELEMENT] Compounds" category in TRI if the substance and its compounds had the same toxicity weight in RSEI.
- Reported releases of "Chromium and Chromium 0 Compounds" (TRI class N090) were associated with cancer, developmental harm and reproductive health effects of hexavalent chromium compounds as indicated on the Prop 65 list. TRI reporting of chromium compounds does not distinguish among various types of chromium compound releases; readers should be aware that some releases of trivalent chromium, which is less toxic than hexavalent chromium, may be included in these releases. Reported releases of "Chromium" (Chemical Abstracts Service number 7440-47-3) were not assigned the health effects of chromium compounds as these were assumed to represent releases of the elemental form of chromium, which is not connected with any of the health effects evaluated in this report.
- In some cases, groups of chemicals or individual chemicals were listed with associated health effects in the Prop 65 list but with no corresponding Chemical Abstracts Service (CAS) number. In these cases, CAS numbers were obtained from the EPA's listing of TRI chemicals or obtained from other sources and assigned as described in the footnote.⁸³

Watersheds

TRI allows, but does not require, facilities to supply REACH codes of the waterway segments into which they release toxic substances. Because relatively few facilities report REACH codes – and because the names of waterways as reported by facilities are subject to duplication, inaccuracy, spelling mistakes and other sources of inconsistency – releases to waterways in this report are evaluated by watershed as opposed to waterway.

TRI-reporting facilities were associated with watersheds using a spatial join in QGIS software. Watershed boundaries at the Hydrologic Unit Code 8 (HUC8) level were obtained from the Watershed Boundary Dataset, downloaded from the U.S. Department of Agriculture, Natural Resources Conservation Service, 19 May 2022.⁸⁴ Geographic coordinates of facilities were downloaded from the EPA's TRI EZ Search tool using the "Facility Information" option on 18 May 2022 at https://enviro.epa.gov/enviro/ez_column_v2.list?database_type=TRI&table_name=V_TRI_FACILITY_EZ. The geographic coordinate system of the Watershed Boundary Dataset was changed to NAD83 horizontal datum to match that of the TRI facilities dataset before undertaking the spatial join. Note that watersheds are associated with the coordinates of the facility itself as provided in the TRI EZ Search, not the coordinates of specific outfalls releasing into waterways. In a limited number of cases in which facilities straddle HUC8 boundaries, this may result in releases erroneously being assigned to an adjacent HUC8, or, in the case of facilities that release toxic chemicals via several outfalls

to multiple HUC8s, aggregating all of a facility's releases and assigning them to a single HUC8.

Parent companies

Some facilities that report to TRI do not report having a parent company. Since individual facilities can be major polluters at a level comparable to the total pollution of a parent company with multiple facilities, for calculations involving parent companies, the facility name of those facilities was treated as the parent company name, and is listed as such in Tables C-2 and C-3.

Industries

To provide the industry category of reporting facilities, the North American Industry Classification System (NAICS) codes available in the TRI EZ Search tool were used, with definitions for the codes downloaded 16 May 2022 from https://www.census.gov/naics/?48967. The 2017 definitions were used because the TRI reports analyzed in this report are from before the 2022 definitions took effect.

Calculations

Calculations of the total amount of chemicals released and the total toxicity weighted amount of chemicals released were then made, aggregating entries by state; watershed; facility; parent company; industry; and whether the chemical released had cancer, developmental harm or reproductive health effects. The total amount of cancer-causing, developmental or reproductive toxic chemicals released by state was also calculated, as well as the facility that released the largest amount of chemicals and the largest toxicity weighted amount of chemicals by state.

Appendices

Appendix A: Detailed data on discharges to waterways

TABLE A-1. TOTAL TOXIC RELEASES AND TOXICITY-WEIGHTED RELEASES BY STATE OR TERRITORY, 2020

| State or territory | Total toxics released (lbs.) | Rank (of 54, including territories) | Toxicity-weighted releases (lbs. eq.) | Rank |
|----------------------|---------------------------------|--|--|------|
| Alabama | 10,173,322 | 5 | 1,667,496,165 | 10 |
| Alaska | 411,368 | 37 | 117,828,559 | 30 |
| Arizona | 1,072 | 49 | 8,857,122 | 42 |
| Arkansas | 5,658,179 | 14 | 343,911,430 | 20 |
| California | 2,357,386 | 29 | 26,970,138 | 34 |
| Colorado | 1,329,328 | 33 | 10,175,197 | 39 |
| Connecticut | 15,860 | 46 | 10,762,258 | 37 |
| Delaware | 6,592,564 | 11 | 9,667,587 | 40 |
| District of Columbia | 978 | 50 | 616 | 54 |
| Florida | 1,078,265 | 34 | 286,782,495 | 21 |
| Georgia | 5,767,467 | 13 | 1,593,432,406 | 11 |
| Guam | 242,762 | 38 | 152,940 | 52 |
| Hawaii | 551,214 | 36 | 881,528 | 47 |
| Idaho | 4,053,298 | 19 | 128,301,255 | 29 |
| Illinois | 7,140,443 | 10 | 643,412,777 | 18 |
| Indiana | 14,085,748 | 2 | 7,319,010,165 | 5 |
| lowa | 4,577,376 | 16 | 285,581,627 | 22 |
| Kansas | 1,383,822 | 32 | 17,397,556 | 35 |
| Kentucky | 7,162,639 | 9 | 816,117,907 | 16 |
| Louisiana | 11,378,399 | 4 | 10,853,487,483 | 4 |
| Maine | 2,524,447 | 28 | 134,643,670 | 27 |
| Maryland | 94,361 | 43 | 697,247 | 48 |

| State or territory | Total toxics released (lbs.) | Rank (of 54, including territories) | Toxicity-weighted releases (lbs. eq.) | Rank |
|--------------------|---------------------------------|--|--|------|
| Massachusetts | 3,652 | 48 | 7,773,078 | 43 |
| Michigan | 3,478,941 | 22 | 1,180,953,572 | 14 |
| Minnesota | 1,780,380 | 31 | 99,072,817 | 31 |
| Mississippi | 9,111,172 | 7 | 646,294,892 | 17 |
| Missouri | 3,450,394 | 23 | 252,513,139 | 23 |
| Montana | 30,027 | 45 | 593,328 | 49 |
| Nebraska | 5,629,522 | 15 | 9,545,975 | 41 |
| Nevada | 895 | 51 | 84,365,442 | 32 |
| New Hampshire | 274 | 54 | 253,849 | 51 |
| New Jersey | 3,808,145 | 20 | 61,723,244 | 33 |
| New Mexico | 185,757 | 39 | 2,718,312 | 45 |
| New York | 3,706,827 | 21 | 130,805,993 | 28 |
| North Carolina | 9,746,239 | 6 | 904,697,337 | 15 |
| North Dakota | 134,894 | 41 | 158,990,453 | 26 |
| Ohio | 7,497,207 | 8 | 3,441,960,029 | 7 |
| Oklahoma | 4,244,515 | 18 | 174,955,123 | 24 |
| Oregon | 1,022,735 | 35 | 165,073,848 | 25 |
| Pennsylvania | 5,861,055 | 12 | 1,670,004,499 | 9 |
| Puerto Rico | 887 | 52 | 12,735,953 | 36 |
| Rhode Island | 286 | 53 | 442,223 | 50 |
| South Carolina | 3,032,333 | 25 | 1,856,799,384 | 8 |
| South Dakota | 4,569,604 | 17 | 2,882,133 | 44 |
| Tennessee | 2,783,123 | 26 | 1,485,380,761 | 13 |
| Texas | 16,778,747 | 1 | 39,673,055,922 | 2 |
| Utah | 134,988 | 40 | 1,486,284,633 | 12 |
| Vermont | 120,767 | 42 | 85,643 | 53 |
| Virgin Islands | 58,857 | 44 | 10,643,729 | 38 |
| Virginia | 12,218,174 | 3 | 31,982,111,294 | 3 |
| Washington | 2,709,630 | 27 | 546,792,373 | 19 |
| West Virginia | 1,859,067 | 30 | 4,832,813,087 | 6 |
| Wisconsin | 3,061,305 | 24 | 45,122,237,956 | 1 |
| Wyoming | 6,025 | 47 | 2,115,552 | 46 |
| Total, U.S. | 193,606,724 | N/A | 160,282,243,700 | N/A |

TABLE A-2. TOXICS RELEASED BY HEALTH EFFECT AND STATE OR TERRITORY

| State or | Cance | r | Developmenta | l effects | Reproductive | effects |
|----------------|-----------------|--------------|-----------------|-----------|-----------------|---------|
| territory | Pounds released | Rank (of 51) | Pounds released | Rank | Pounds released | Rank |
| Alabama | 106,122 | 3 | 406,729 | 3 | 12,194 | 5 |
| Alaska | 277 | 38 | 177 | 41 | 104 | 43 |
| Arizona | 266 | 39 | 17 | 49 | 11 | 49 |
| Arkansas | 32,975 | 11 | 108,133 | 13 | 2,162 | 21 |
| California | 1,652 | 31 | 1,630 | 32 | 1,919 | 23 |
| Colorado | 553 | 35 | 540 | 36 | 539 | 34 |
| Connecticut | 754 | 33 | 1,834 | 31 | 334 | 38 |
| Delaware | 163 | 41 | 150 | 42 | 518 | 35 |
| Florida | 36,992 | 9 | 73,213 | 14 | 5,178 | 13 |
| Georgia | 40,777 | 7 | 189,610 | 10 | 3,109 | 16 |
| Hawaii | 39 | 46 | 42 | 45 | 52 | 45 |
| Idaho | 8,116 | 26 | 42,513 | 18 | 464 | 37 |
| Illinois | 15,874 | 19 | 32,663 | 20 | 8,888 | 7 |
| Indiana | 52,207 | 6 | 34,195 | 19 | 27,088 | 2 |
| lowa | 19,810 | 17 | 23,139 | 22 | 1,880 | 25 |
| Kansas | 375 | 37 | 6,480 | 28 | 6,481 | 11 |
| Kentucky | 31,666 | 12 | 319,661 | 7 | 6,834 | 8 |
| Louisiana | 71,252 | 4 | 266,377 | 9 | 18,545 | 4 |
| Maine | 14,325 | 21 | 51,643 | 15 | 976 | 30 |
| Maryland | 527 | 36 | 282 | 39 | 324 | 39 |
| Massachusetts | 1,513 | 32 | 816 | 34 | 815 | 31 |
| Michigan | 11,346 | 23 | 48,243 | 16 | 2,254 | 20 |
| Minnesota | 11,470 | 22 | 531 | 37 | 487 | 36 |
| Mississippi | 30,038 | 14 | 345,666 | 5 | 3,445 | 15 |
| Missouri | 2,843 | 29 | 10,271 | 27 | 1,948 | 22 |
| Montana | 78 | 44 | 39 | 47 | 24 | 48 |
| Nebraska | 147 | 42 | 411 | 38 | 179 | 41 |
| Nevada | 56 | 45 | 56 | 44 | - | 51 |
| New Hampshire | 6 | 50 | 4 | 50 | 4 | 50 |
| New Jersey | 1,821 | 30 | 3,866 | 30 | 1,083 | 29 |
| New Mexico | 111 | 43 | 109 | 43 | 109 | 42 |
| New York | 16,899 | 18 | 45,661 | 17 | 1,098 | 28 |
| North Carolina | 40,080 | 8 | 602,927 | 1 | 2,383 | 18 |

| State or | Cance | r | Developmenta | l effects | Reproductive | Reproductive effects | |
|----------------|-----------------|--------------|-----------------|-----------|-----------------|-----------------------------|--|
| territory | Pounds released | Rank (of 51) | Pounds released | Rank | Pounds released | Rank | |
| North Dakota | 230 | 40 | 179 | 40 | 181 | 40 | |
| Ohio | 10,056 | 25 | 12,840 | 26 | 6,097 | 12 | |
| Oklahoma | 5,341 | 27 | 13,442 | 25 | 1,145 | 27 | |
| Oregon | 15,707 | 20 | 130,526 | 12 | 1,911 | 24 | |
| Pennsylvania | 19,944 | 16 | 21,079 | 23 | 22,621 | 3 | |
| Puerto Rico | 681 | 34 | 680 | 35 | 678 | 32 | |
| Rhode Island | 19 | 49 | 41 | 46 | 28 | 47 | |
| South Carolina | 130,579 | 1 | 325,355 | 6 | 2,738 | 17 | |
| Tennessee | 35,872 | 10 | 133,677 | 11 | 10,723 | 6 | |
| Texas | 123,257 | 2 | 298,076 | 8 | 28,333 | 1 | |
| Utah | 3,042 | 28 | 4,435 | 29 | 2,292 | 19 | |
| Vermont | 0 | 51 | 1,029 | 33 | 611 | 33 | |
| Virgin Islands | 19 | 48 | 3 | 51 | 85 | 44 | |
| Virginia | 10,906 | 24 | 16,930 | 24 | 6,785 | 10 | |
| Washington | 28,918 | 15 | 387,509 | 4 | 4,411 | 14 | |
| West Virginia | 53,861 | 5 | 24,206 | 21 | 6,823 | 9 | |
| Wisconsin | 31,396 | 13 | 595,112 | 2 | 1,452 | 26 | |
| Wyoming | 29 | 47 | 29 | 48 | 29 | 46 | |
| Total, U.S. | 1,020,987 | | 4,582,780 | | 208,374 | | |

TABLE A-2. TOXICS RELEASED BY HEALTH EFFECT AND STATE OR TERRITORY

TABLE A-3. TOP 50 LOCAL WATERSHEDS BY TOTAL TOXICS RELEASED, 2020

| Rank | Receiving watershed | State(s) containing watershed | Total toxics released (lbs.) | Rank | Receiving watershed | State(s) containing watershed | Total toxics released (lbs.) |
|---------|------------------------------------|-------------------------------------|------------------------------------|------|------------------------------------|-------------------------------------|------------------------------------|
| 1 | Lower Ohio-Little Pigeon | IN, KY | 12,008,366 | 26 | Peruque-Piasa | IL, MO | 1,794,253 |
| 2 | Upper New | NC, TN, VA | 10,266,141 | 27 | Middle Coosa | AL | 1,711,757 |
| 3 | Brandywine-Christina | DE, MD, PA | 6,191,362 | 28 | Lower Calcasieu | LA | 1,651,237 |
| 4 | Lower Cape Fear | NC | 5,017,810 | 29 | Castle Rock | WI | 1,649,881 |
| 5 | Muskingum | ОН | 4,640,523 | 30 | Lower Platte-Shell | NE | 1,604,795 |
| 6 | Lower Big Sioux | IA, MN, NE, SD | 4,507,539 | 31 | Upper Ohio-Shade | OH, WV | 1,589,754 |
| 7 | Lake Walcott | ID | 3,866,978 | 32 | South Corpus Christi Bay | TX | 1,540,943 |
| 8 9 | Buffalo-San Jacinto | TX IN, KY, OH | 3,784,822 | 33 | Upper Columbia-Priest Rapids | WA | 1,510,660 |
| 9 10 | Middle Ohio-Laughery Lower Rock | IL, WI | 3,524,720 3,069,016 | 34 | Lower Ochlockonee | FL, GA | 1,475,102 |
| 11 | Upper Pearl | MS | 2,879,674 | 35 | Lower Tombigbee | AL | 1,467,069 |
| 12 | Kalamazoo | MI | 2,780,868 | 36 | Lower Sangamon | IL | 1,433,193 |
| 12 | Lake O' the Pines | ТХ | 2,707,206 | 37 | Amite | la, Ms | 1,412,102 |
| 14 | Middle Platte-Buffalo | NE | 2,660,029 | 38 | Lower Neches | TX | 1,403,526 |
| 15 | Sandy Hook-Staten Island | NJ, NY | 2,630,054 | 39 | Lower Iowa | IA | 1,304,962 |
| 16 | Lower Roanoke | NC | 2,504,091 | 40 | Suisun Bay | CA | 1,291,366 |
| 17 | Lower Neosho | AR, OK | 2,351,389 | 41 | Lower Brazos-Little Brazos | ТХ | 1,263,160 |
| 18 | Schuylkill | PA | 2,248,721 | 42 | Lower Little Arkansas, Oklahoma | AR, OK | 1,259,081 |
| 19 | East Central Louisiana Coastal | LA | 2,220,834 | 43 | Lower Des Moines | IA, MO | 1,229,495 |
| 20 | Lake Maurepas | LA | 2,177,646 | 44 | Little River Ditches | AR, MO | 1,185,996 |
| 21 | Lower Monongahela | PA, WV | 2,153,250 | 45 | Middle Big Blue | NE | 1,169,499 |
| 22 | Becaguimec Stream-Saint | , Canada, ME | 2,031,077 | 46 | Upper Little | ОК | 1,169,229 |
| | John River | | . , | 47 | Wheeler Lake | AL, TN | 1,161,657 |
| 23 | Upper Leaf | MS | 2,030,823 | 48 | Oswego | NY | 1,151,719 |
| 24 | West Galveston Bay | ТХ | 1,918,283 | 49 | Lower Walnut River | KS | 1,137,220 |
| 25 | Middle Green | KY | 1,905,073 | 50 | Middle Savannah | GA, SC | 1,114,110 |

TABLE A-4. TOP 50 WATERSHEDS BY TOXICITY-WEIGHTED RELEASES, 2020

| Rank | Receiving watershed | State(s) containing watershed | Toxicity- weighted releases (lbs. eq.) | Rank | Receiving watershed | State(s) containing watershed | Toxicity- weighted releases (lbs. eq.) |
|------|-----------------------------------|-------------------------------------|---|------|-----------------------------|-------------------------------------|---|
| 1 | Manitowoc-Sheboygan | WI | 45,021,201,876 | 26 | Tittabawassee | MI | 254,847,991 |
| 2 | Austin-Oyster | TX | 38,320,027,272 | 27 | Kankakee | IL, IN, MI | 251,563,683 |
| 3 | Upper New (River) | NC, TN, VA | 31,725,710,405 | 28 | Salt | КҮ | 244,755,734 |
| 4 | Lake Maurepas | LA | 8,889,410,342 | 29 | Ohio Brush-Whiteoak | KY, OH | 241,387,002 |
| 5 | Middle Wabash-Little | IL, IN | 6,188,334,032 | 30 | Mississippi Coastal | AL, LA, MS | 231,065,868 |
| | Vermilion | | | 31 | Buffalo-San Jacinto | ТХ | 220,583,314 |
| 6 | Raccoon-Symmes | KY, OH, WV | 4,442,261,040 | 32 | Upper Catawba | NC, SC | 209,420,848 |
| 7 | Upper Ohio-Wheeling | OH, PA, WV | 1,684,294,112 | 33 | Meramec | MO | 196,224,274 |
| 8 | Jordan | UT | 1,466,638,353 | 34 | Silver-Little Kentucky | IN, KY | 194,589,747 |
| 9 | Cooper | SC | 1,463,567,312 | 35 | Upper Cape Fear | NC | 191,260,017 |
| 10 | Upper Ocmulgee | GA | 1,020,772,866 | 36 | Lower Alabama | AL | 188,702,060 |
| 11 | South Fork Holston | NC, TN, VA | 971,438,874 | 37 | Lower Grand | LA | 185,973,263 |
| 12 | Ottawa-Stony | MI, OH | 872,174,374 | 38 | Bayou Sara-Thompson | la, MS | 183,704,023 |
| 13 | Lehigh | PA | 761,592,816 | 39 | Cahaba | AL | 183,021,397 |
| 14 | Middle Ohio-Laughery | IN, KY, OH | 740,843,456 | 40 | Little Calumet-Galien | IL, IN, MI | 172,048,483 |
| 15 | Lower Calcasieu | LA | 694,348,147 | 41 | Tyger | SC | 163,677,985 |
| 16 | East Central Louisiana Coastal | LA | 636,319,179 | 42 | South Corpus Christi Bay | ТХ | 160,879,702 |
| 17 | Middle Allegheny- | PA | 617,004,602 | 43 | Lower Roanoke | NC | 157,556,929 |
| 18 | Redbank Muskingum | ОН | 611,333,751 | 44 | Carolina Coastal- Sampit | SC | 155,605,229 |
| 19 | Upper San Antonio | ТХ | 521,615,474 | 45 | Chicago | IL, IN | 154,555,218 |
| 20 | Lower Ohio-Little Pigeon | IN, KY | 509,927,411 | 46 | West Fork | WV | 139,105,744 |
| 21 | Wheeler Lake | AL, TN | 505,409,365 | 47 | Lower Dan | NC, VA | 138,166,827 |
| 22 | Lower Columbia- Clatskanie | OR, WA | 385,306,271 | 48 | Lower Chattahoochee | AL, FL, GA | 138,124,386 |
| 23 | Peruque-Piasa | IL, MO | 341,294,168 | 49 | Lower Coosa | AL | 132,413,276 |
| 24 | Upper Ohio-Shade | OH, WV | 338,954,147 | 50 | Mattaponi | VA | 131,143,708 |
| 25 | Lower Tennessee-Beech | MS, TN | 275,902,448 | | | | |

TABLE A-5. TOP 50 LOCAL WATERSHEDS BY TOTAL CANCER-CAUSING CHEMICALS RELEASED, 2020

| Rank | Receiving watershed | State(s) containing watershed | Cancer causing chemicals released (lbs.) | Rank | Receiving watershed | State(s) containing watershed | Cancer causing chemicals released (lbs.) |
|----------|---|-------------------------------------|--|------|---------------------------------|-------------------------------------|--|
| 1 | Austin-Oyster | ТХ | 82,608 | 26 | Lower Chattahoochee | AL, FL, GA | 10,570 |
| 2 | Cooper | SC | 58,916 | 27 | Lower Tennessee | KY, TN | 9,889 |
| 3 | Raccoon-Symmes | KY, OH, WV | 44,590 | 28 | Middle Pearl-Silver | MS | 9,869 |
| 4 | North Fork Edisto | SC | 36,626 | 29 | Middle Tombigbee- | AL, MS | 9,735 |
| 5 | Wheeler Lake | AL, TN | 29,895 | | Chickasaw | | |
| 6 | Little Calumet-Galien | IL, IN, MI | 29,691 | 30 | Lehigh | PA | 9,687 |
| 7 | Carolina Coastal-Sampit | SC | 26,301 | 31 | Lower Ouachita | LA | 9,326 |
| 8 | St. Marys | FL, GA | 20,794 | 32 | Upper San Antonio | ТХ | 9,218 |
| 9 | Lower Roanoke | NC | 19,601 | 33 | Pigeon | NC, TN | 8,667 |
| 10 | Lower Tennessee-Beech | MS, TN | 19,001 | 34 | Siletz-Yaquina | OR | 8,550 |
| 11 | Middle Wabash-Little | IL, IN | 16,771 | 35 | Puget Sound | WA | 8,114 |
| | Vermilion | | | 36 | Clearwater | ID, WA | 8,052 |
| 12 | East Central Louisiana | LA | 16,374 | 37 | Bayou Macon | AR, LA | 8,007 |
| 10 | Coastal | A.I. | 15 470 | 38 | South Fork Holston | NC, TN, VA | 7,552 |
| 13 | Lower Alabama | AL | 15,470 | 39 | Saint Croix River | Canada, ME | 7,274 |
| 14 | Lower Calcasieu | LA | 15,247 | 40 | Lower Savannah | GA, SC | 7,261 |
| 15 | Lake Maurepas | LA | 15,051 | 41 | Cumberland-St. Simons | FL, GA | 6,771 |
| 16 | Manitowoc-Sheboygan | WI | 15,036 | 42 | Lower Neches | ТХ | 6,691 |
| 17 | Lower Columbia- Clatskanie | OR, WA | 14,919 | 43 | Buffalo-San Jacinto | ТХ | 6,349 |
| 18 | Lower Conecuh | AL, FL | 14,097 | 44 | Middle Columbia-Lake Wallula | OR, WA | 6,239 |
| 19 | Lake Champlain | Canada, NY, | 13,926 | 45 | Lower Rainy | Canada, MN | 6,217 |
| 20 | | VT | 12.010 | 46 | Bayou Bartholomew | AR, LA | 6,167 |
| | Castle Rock | WI | 13,018 | 47 | Mobile-Tensaw | AL | 5,956 |
| 21 | Upper Alabama | AL | 12,443 | 48 | Flint-Henderson | IA, IL, MO | 5,915 |
| 22 23 | Copperas-Duck Lower Little Arkansas, | IA, IL AR, OK | 12,393 11,676 | 49 | Lower Ohio-Little Pigeon | IN, KY | 5,628 |
| ٦ ۸ | Oklahoma | | 11 100 | 50 | Lower St. Johns | FL | 5,351 |
| 24 25 | Silver-Little Kentucky Middle Tombigbee- Lubbub | IN, KY AL, MS | 11,169 10,657 | | | | |

TABLE A-6. TOP 50 LOCAL WATERSHEDS BY REPRODUCTIVE TOXICS RELEASED, 2020

| Rank | Receiving watershed | State(s) containing watershed | Reproductive toxics released (lbs.) | Rank | Receiving watershed | State(s) containing watershed | Reproductive toxics released (lbs.) |
|------|-----------------------------------|-------------------------------------|---|------|---|-------------------------------------|---|
| 1 | Middle Wabash-Little Vermilion | IL, IN | 13,054 | 26 | Middle Chattahoochee- Walter F. George Reservoir | AL, GA | 1,710 |
| 2 | Lehigh | PA | 9,687 | 27 | Silver-Little Kentucky | IN, KY | 1,653 |
| 3 | Upper San Antonio | ТХ | 9,219 | 28 | Cooper | SC | 1,586 |
| 4 | Lower Monongahela | PA, WV | 7,364 | 29 | Salt | КҮ | 1,581 |
| 5 | Upper Ohio | OH, PA, WV | 6,592 | 30 | Lower Grand | LA | 1,577 |
| 6 | Little Calumet-Galien | IL, IN, MI | 6,585 | 31 | Mobile-Tensaw | AL | 1,532 |
| 7 | Austin-Oyster | ТХ | 6,096 | 32 | Etowah | GA | 1,511 |
| 8 | Middle Kansas | KS | 6,065 | 33 | South Corpus Christi Bay | ТХ | 1,509 |
| 9 | Lake Maurepas | LA | 5,904 | 34 | East Central Louisiana | LA | 1,462 |
| 10 | Lower James | VA | 5,060 | | Coastal | | |
| 11 | Middle Ohio-Laughery | IN, KY, OH | 4,488 | 35 | St. Marys | IN, OH | 1,423 |
| 12 | Lower St. Johns | FL | 4,192 | 36 | Wheeler Lake | AL, TN | 1,356 |
| 13 | Buffalo-San Jacinto | ТХ | 4,181 | 37 | Bayou Sara-Thompson | la, MS | 1,339 |
| 14 | Lower Calcasieu | LA | 3,997 | 38 | Lower Tombigbee | AL | 1,283 |
| 15 | Peruque-Piasa | IL, MO | 3,532 | 39 | Ottawa-Stony | MI, OH | 1,235 |
| 16 | Lower Cumberland | KY, TN | 3,145 | 40 | Strait of Georgia | Canada, WA | 1,210 |
| 17 | Chicago | IL, IN | 3,045 | 41 | Eastern Louisiana Coastal | la, MS | 1,178 |
| 18 | South Fork Holston | NC, TN, VA | 2,620 | 42 | Highland-Pigeon | IL, IN, KY | 1,172 |
| 19 | Lower Columbia- | OR, WA | 2,472 | 43 | Lower Ouachita | LA | 1,107 |
| | Clatskanie | | | 44 | Lower Neches | ТХ | 1,080 |
| 20 | Lower Ohio-Little Pigeon | IN, KY | 2,219 | 45 | East Matagorda Bay | ТХ | 1,016 |
| 21 | Lower Tennessee-Beech | MS, TN | 2,060 | 46 | Suisun Bay | CA | 1,013 |
| 22 | Locust | AL | 2,019 | 47 | Muskingum | ОН | 1,010 |
| 23 | Jordan | UT | 2,012 | 48 | Sandy Hook-Staten | NJ, NY | 931 |
| 24 | Kentucky Lake | KY, TN | 1,983 | | Island | | |
| 25 | Siletz-Yaquina | OR | 1,810 | 49 | Tuscarawas | ОН | 915 |
| | | | | 50 | Upper Coosa | AL, GA | 905 |

TABLE A-7. TOP 50 LOCAL WATERSHEDS BY DEVELOPMENTAL TOXICS RELEASED, 2020

| Rank | Receiving watershed | State(s) containing watershed | Developmental toxics released (lbs.) | Rank | Receiving watershed | State(s) containing watershed | Developmental toxics released (lbs.) |
|------|---------------------------------|-------------------------------------|--|----------|--|-------------------------------------|--|
| 1 | Castle Rock | WI | 568,103 | 26 | Clearwater | ID, WA | 42,449 |
| 2 | Middle Neuse | NC | 395,424 | 27 | Lower Arkansas- | AR | 40,712 |
| 3 | Lower Alabama | AL | 320,140 | | Maumelle | | |
| 4 | Bayou De Chien- Mayfield | KY, TN | 282,640 | 28 29 | Econfina-Steinhatchee Bayou Sara-Thompson | FL LA, MS | 38,519 37,376 |
| 5 | Lower Yazoo | LA, MS | 265,395 | 30 | Lower Conecuh | AL, FL | 36,845 |
| 6 | Lower Chehalis | WA | 239,724 | 31 | Lower Little Arkansas, | AR, OK | 35,133 |
| 7 | Carolina Coastal-Sampit | SC | 232,234 | | Oklahoma | | |
| 8 | Buffalo-San Jacinto | ТХ | 178,372 | 32 | East Central Louisiana Coastal | LA | 30,748 |
| 9 | South Fork Holston | NC, TN, VA | 113,501 | 33 | Mckenzie | OR | 28,623 |
| 10 | Middle Columbia-Lake Wallula | OR, WA | 76,838 | 34 | Lower Pearl | la, MS | 27,651 |
| 11 | Lower Neches | ТХ | 76,050 | 35 | Middle Pearl-Silver | MS | 27,607 |
| 12 | Lower Columbia- | OR, WA | 75,878 | 36 | Silver-Little Kentucky | IN, KY | 23,116 |
| 12 | Clatskanie | | 13,010 | 37 | Mississippi Coastal | AL, LA, MS | 22,125 |
| 13 | Middle Savannah | GA, SC | 74,239 | 38 | Middle Wabash-Busseron | IL, IN | 21,013 |
| 14 | Cooper | SC | 61,542 | 39 | Lower Androscoggin River | ME, NH | 20,917 |
| 15 | Lake Maurepas | LA | 61,041 | 40 | Lower Ouachita | LA | 19,705 |
| 16 | Bayou Pierre | LA, TX | 58,493 | 41 | Lower Genesee | NY | 17,887 |
| 17 | Lower Chattahoochee | AL, FL, GA | 57,055 | 42 | North Fork Edisto | SC | 17,739 |
| 18 | Lower Cape Fear | NC | 56,467 | 43 | Middle Wabash-Little | IL, IN | 16,668 |
| 19 | Upper Cape Fear | NC | 53,052 | | Vermilion | | |
| 20 | Pigeon | NC, TN | 47,827 | 44 | Lower Fox | WI | 16,180 |
| 21 | Cumberland-St. Simons | FL, GA | 46,048 | 45 46 | Saint Croix River Little Muskingum- | Canada, ME OH, WV | 16,073 15,953 |
| 22 | Lower Roanoke | NC | 44,324 | 40 | Middle Island | 011, 111 | 222 |
| 22 | Menominee | MI, WI | 44,035 | 47 | Hudson-Hoosic | MA, NY, VT | 15,094 |
| 23 | Siletz-Yaquina | OR | 43,810 | 48 | St. Marys | FL, GA | 14,945 |
| 24 | Puget Sound | WA | 43,541 | 49 | Copperas-Duck | IA, IL | 14,793 |
| ZJ | | ¥ ¥ / 1 | | 50 | Lower Kennebec River | ME | 14,501 |

Appendix B: Facilities and companies releasing toxics to waterways

TABLE B-1. TOP 50 FACILITIES BY TOTAL TOXICS RELEASED (BY WEIGHT), 2020

| Rank | Facility | Industry | City | State | Receiving watershed | Total toxics released (lbs.) |
|------|--|--|--------------------|-------|--|---------------------------------|
| 1 | Cleveland-Cliffs Steel Corp. (Rockport Works) | Iron and Steel Mills and Ferroalloy Manufacturing | Rockport | IN | Lower Ohio-Little Pigeon | 11,929,737 |
| 2 | U.S. Army Radford Army Ammunition Plant | National Security | Radford | VA | Upper New | 10,266,136 |
| 3 | Delaware City Refinery | Petroleum Refineries | Delaware City | DE | Brandywine-Christina | 6,190,936 |
| 4 | Smithfield-Tar Heel | Animal (except Poultry) Slaughtering | Tar Heel | NC | Lower Cape Fear | 4,766,415 |
| 5 | Cleveland-Cliffs Steel Corp. | Iron and Steel Mills and Ferroalloy Manufacturing | Coshocton | OH | Muskingum | 4,636,828 |
| 6 | Smithfield Packaged Meats Corp Sioux Falls | Animal (except Poultry) Slaughtering | Sioux Falls | SD | Lower Big Sioux | 4,507,529 |
| 7 | McCain Foods USA Inc. | Frozen Fruit, Juice, and Vegetable Manufacturing | Burley | ID | Lake Walcott | 3,866,978 |
| 8 | North American Stainless | Iron and Steel Mills and Ferroalloy Manufacturing | Ghent | KY | Middle Ohio-Laughery | 3,363,350 |
| 9 | Tyson Fresh Meats Inc Joslin II | Animal (except Poultry) Slaughtering | Hillsdale | IL | Lower Rock | 3,068,370 |
| 10 | Pilgrim's Pride Corp. Mt. Pleasant Complex | Poultry Processing | Mount Pleasant | ΤX | Lake O' the Pines | 2,694,056 |
| 11 | Tyson Fresh Meats Inc. | Animal (except Poultry) Slaughtering | Lexington | NE | Middle Platte-Buffalo | 2,660,028 |
| 12 | Phillips 66 Co-Bayway Refinery | Petroleum Refineries | Linden | NJ | Sandy Hook-Staten Island | 2,624,639 |
| 13 | JBS Plainwell | Animal (except Poultry) Slaughtering | Plainwell | MI | Kalamazoo | 2,515,483 |
| 14 | Lewiston Processing Plant | Rendering and Meat Byproduct Processing | Lewiston Woodville | NC | Lower Roanoke | 2,346,980 |
| 15 | Pryor Solae | Soybean and Other Oilseed Processing | Pryor | ОК | Lower Neosho | 2,248,189 |
| 16 | Tyson Farms Inc Carthage MS Processing Plant | Poultry Processing | Carthage | MS | Upper Pearl | 2,224,631 |
| 17 | USS-Clairton Plant | All Other Petroleum and Coal Products Manufacturing | Clairton | PA | Lower Monongahela | 2,135,786 |
| 18 | McCain Foods USA Inc. | Frozen Fruit, Juice, and Vegetable Manufacturing | Easton | ME | Becaguimec Stream- Saint John River | 2,031,077 |
| 19 | Perdue Cromwell Processing Plant | Poultry Processing | Beaver Dam | KY | Middle Green | 1,893,057 |
| 20 | Wood River Refinery | Petroleum Refineries | Roxana | IL | Peruque-Piasa | 1,777,166 |
| 21 | Valero Refining - Texas LP Houston Refinery | Petroleum Refineries | Houston | ΤX | Buffalo-San Jacinto | 1,755,018 |
| 22 | Cargill Meat Solutions Corp. | Animal (except Poultry) Slaughtering | Schuyler | NE | Lower Platte-Shell | 1,603,968 |
| 23 | CF Industries Nitrogen LLC | Nitrogenous Fertilizer Manufacturing | Donaldsonville | LA | East Central Louisiana Coastal | 1,576,607 |

| Rank | Facility | Industry | City | State | Receiving watershed | Total toxics released (lbs.) |
|------|---|--|-------------------|-------|---------------------------------|---------------------------------|
| 24 | Valero Refining-Texas LP | Petroleum Refineries | Texas City | TX | West Galveston Bay | 1,511,335 |
| 25 | Lamb Weston Inc. Richland Facility | Frozen Fruit, Juice, and Vegetable Manufacturing | Richland | WA | Upper Columbia-Priest Rapids | 1,510,660 |
| 26 | BASF Corp. Attapulgus Ops | Ground or Treated Mineral and Earth Manufacturing | Attapulgus | GA | Lower Ochlockonee | 1,475,100 |
| 27 | Koch Foods Of Gadsden | Poultry Processing | Gadsden | AL | Middle Coosa | 1,437,107 |
| 28 | JBS/Swift Pork Co. | Meat Processed from Carcasses | Beardstown | IL | Lower Sangamon | 1,433,193 |
| 29 | Tyson Fresh Meats IncLouisa County | Animal (except Poultry) Slaughtering | Columbus Junction | IA | Lower Iowa | 1,304,961 |
| 30 | Sanderson Farms Inc. | Poultry Processing | Bryan | ТХ | Lower Brazos-Little Brazos | 1,259,743 |
| 31 | JBS Souderton Inc Rendering Div. | Rendering and Meat Byproduct Processing | Souderton | PA | Schuylkill | 1,239,724 |
| 32 | Kraton Polymers US LLC | Synthetic Rubber Manufacturing | Belpre | ОН | Upper Ohio-Shade | 1,200,951 |
| 33 | Biokyowa Inc. | Other Animal Food Manufacturing | Cape Girardeau | MO | Little River Ditches | 1,170,777 |
| 34 | Tyson Poultry Inc Broken Bow Processing Plant | Poultry Processing | Broken Bow | ОК | Upper Little | 1,169,229 |
| 35 | Anheuser-Busch LLC | Breweries | Baldwinsville | NY | Oswego | 1,151,719 |
| 36 | Creekstone Farms Premium Beef LLC | Animal (except Poultry) Slaughtering | Arkansas City | KS | Lower Walnut River | 1,137,220 |
| 37 | Smithfield Fresh Meats Corp Crete | Animal (except Poultry) Slaughtering | Crete | NE | Middle Big Blue | 1,134,584 |
| 38 | Outokumpu Stainless USA LLC | Iron and Steel Mills and Ferroalloy Manufacturing | Calvert | AL | Lower Tombigbee | 1,119,523 |
| 39 | Sanderson Farms Inc. | Poultry Processing | Collins | MS | Upper Leaf | 1,094,712 |
| 40 | LNVA-North Regional Treatment Plant | Sewage Treatment Facilities | Beaumont | ТХ | Lower Neches | 1,052,835 |
| 41 | Eastman Chemical Co. Tennessee Operations | Plastics Material and Resin Manufacturing | Kingsport | TN | South Fork Holston | 1,038,266 |
| 42 | Tyson Farms Inc. River Valley Ingredients – Hanceville | Rendering and Meat Byproduct Processing | Hanceville | AL | Mulberry | 1,030,304 |
| 43 | Tyson Poultry Inc Processing Plant | Poultry Processing | Sedalia | MO | Lamine | 1,022,768 |
| 44 | McCain Foods USA Inc. | Frozen Fruit, Juice, and Vegetable Manufacturing | Wisconsin Rapids | WI | Castle Rock | 1,019,567 |
| 45 | Citgo Petroleum Corp. | Petroleum Refineries | Sulphur | LA | Lower Calcasieu | 1,011,914 |
| 46 | Sanderson Farms Inc. | Poultry Processing | Summit | MS | Bogue Chitto | 976,461 |
| 47 | Angus Chemical Co. | All Other Basic Organic Chemical Manufacturing | Sterlington | LA | Lower Ouachita | 953,439 |
| 48 | Southern Hens Inc. | Poultry Processing | Moselle | MS | Upper Leaf | 935,967 |
| 49 | Carpenter Technology Corp. | Iron and Steel Mills and Ferroalloy Manufacturing | Reading | PA | Schuylkill | 904,010 |
| 50 | Tyson Chicken Inc Hope Processing Plant | Poultry Processing | Норе | AR | McKinney-Posten Bayous | 894,224 |

TABLE B-2. TOP 50 FACILITIES BY TOXICITY-WEIGHTED RELEASES, 2020

| Rank | Facility | Industry | City | State | Receiving watershed | Toxicity-weighted releases (TWPE) |
|------|--|---|----------------|-------|-----------------------------------|-----------------------------------|
| 1 | NextEra Energy Point Beach LLC | Nuclear Electric Power Generation | Two Rivers | WI | Manitowoc-Sheboygan | 45,021,000,000 |
| 2 | Dow Chemical Co. Freeport Facility | All Other Basic Organic Chemical Manufacturing | Freeport | ТХ | Austin-Oyster | 38,309,002,758 |
| 3 | US Army Radford Army Ammunition Plant | National Security | Radford | VA | Upper New | 31,725,710,403 |
| 4 | Duke Energy Indiana Inc Cayuga Generating Station | Fossil Fuel Electric Power Generation | Cayuga | IN | Middle Wabash-Little Vermilion | 6,183,336,100 |
| 5 | Honeywell International Inc. Geismar Plant | Industrial Gas Manufacturing | Carville | LA | Lake Maurepas | 5,962,610,293 |
| 6 | APG Polytech LLC | Plastics Material and Resin Manufacturing | Apple Grove | WV | Raccoon-Symmes | 4,442,086,541 |
| 7 | BASF Corp. | Cyclic Crude, Intermediate, and Gum and Wood Chemical Manufacturing | Geismar | LA | Lake Maurepas | 1,941,011,721 |
| 8 | Cardinal Plant | Fossil Fuel Electric Power Generation | Brilliant | OH | Upper Ohio-Wheeling | 1,682,024,696 |
| 9 | DAK Americas LLC Cooper River Plant | Plastics Material and Resin Manufacturing | Moncks Corner | SC | Cooper | 1,372,652,836 |
| 10 | Kennecott Utah Copper Smelter & Refinery | Nonferrous Metal (except Aluminum) Smelting and Refining | Magna | UT | Jordan | 1,049,112,845 |
| 11 | Arch Wood Protection Inc. | Pesticide and Other Agricultural Chemical Manufacturing | Conley | GA | Upper Ocmulgee | 1,019,990,697 |
| 12 | Eastman Chemical Co. Tennessee Operations | Plastics Material and Resin Manufacturing | Kingsport | TN | South Fork Holston | 967,805,244 |
| 13 | Denka Performance Elastomer LLC | Synthetic Rubber Manufacturing | La Place | LA | Lake Maurepas | 892,889,233 |
| 14 | DTE Electric Co Monroe Power Plant | Fossil Fuel Electric Power Generation | Monroe | MI | Ottawa-Stony | 871,987,528 |
| 15 | Holcim (US) Inc Whitehall Plant | Cement Manufacturing | Whitehall | PA | Lehigh | 756,592,400 |
| 16 | Eagle US 2 LLC | Other Basic Inorganic Chemical Manufacturing | Westlake | LA | Lower Calcasieu | 665,506,153 |
| 17 | Keystone Power Plant | Fossil Fuel Electric Power Generation | Shelocta | PA | Middle Allegheny- Redbank | 616,037,719 |
| 18 | American Electric Power Conesville Plant | Fossil Fuel Electric Power Generation | Conesville | OH | Muskingum | 603,081,420 |
| 19 | Miami Fort Power Co. LLC | Fossil Fuel Electric Power Generation | North Bend | OH | Middle Ohio-Laughery | 545,821,840 |
| 20 | Calaveras Power Station | Fossil Fuel Electric Power Generation | San Antonio | ΤX | Upper San Antonio | 521,380,934 |
| 21 | Ascend Performance Materials Operations LLC - Decatur Plant | All Other Basic Organic Chemical Manufacturing | Decatur | AL | Wheeler Lake | 480,395,930 |
| 22 | Kennecott Utah Copper Mine Concentrators & Power Plant | Copper, Nickel, Lead, and Zinc Mining | Bingham Canyon | UT | Jordan | 406,090,680 |
| 23 | Cornerstone Chemical Co. | All Other Basic Organic Chemical Manufacturing | Westwego | LA | East Central Louisiana Coastal | 382,921,993 |
| 24 | Nippon Dynawave Packaging Co. | Pulp Mills | Longview | WA | Lower Columbia- Clatskanie | 357,390,574 |
| 25 | Packaging Corp. of America Counce Mill | Paperboard Mills | Counce | TN | Lower Tennessee-Beech | 275,902,448 |

| Rank | Facility | Industry | City | State | Receiving watershed | Toxicity-weighted releases (TWPE) |
|------|--|---|---------------|-------|-----------------------------------|-----------------------------------|
| 26 | Olin Winchester LLC Main Plant | Small Arms Ammunition Manufacturing | East Alton | IL | Peruque-Piasa | 259,111,365 |
| 27 | The Dow Chemical Co. | Plastics Material and Resin Manufacturing | Midland | MI | Tittabawassee | 254,846,704 |
| 28 | NIPSCO R.M. Schahfer Generating Station | Fossil Fuel Electric Power Generation | Wheatfield | IN | Kankakee | 251,373,061 |
| 29 | Alcoa Warrick LLC | Alumina Refining and Primary Aluminum Production | Newburgh | IN | Lower Ohio-Little Pigeon | 250,304,450 |
| 30 | Louisville Gas & Electric Co Mill Creek Station | Fossil Fuel Electric Power Generation | Louisville | KY | Salt | 244,535,847 |
| 31 | St. Charles Operations (Taft/Star) Union Carbide Corp. | All Other Basic Organic Chemical Manufacturing | Hahnville | LA | East Central Louisiana Coastal | 241,231,017 |
| 32 | Gavin Power LLC | Fossil Fuel Electric Power Generation | Cheshire | OH | Upper Ohio-Shade | 229,663,294 |
| 33 | Rockport Plant | Fossil Fuel Electric Power Generation | Rockport | IN | Lower Ohio-Little Pigeon | 204,668,477 |
| 34 | Duke Energy Carolinas LLC - Marshall Steam Station | Fossil Fuel Electric Power Generation | Terrell | NC | Upper Catawba | 196,651,502 |
| 35 | Buick Resource Recycling Facility LLC | Secondary Smelting, Refining, and Alloying of Nonferrous Metal (except Copper and Aluminum) | Boss | MO | Meramec | 196,222,513 |
| 36 | DAK Americas LLC | Plastics Material and Resin Manufacturing | Fayetteville | NC | Upper Cape Fear | 190,727,130 |
| 37 | Alabama River Cellulose LLC | Pulp Mills | Perdue Hill | AL | Lower Alabama | 188,702,060 |
| 38 | Chevron Products Co. Pascagoula Refinery | Petroleum Refineries | Pascagoula | MS | Mississippi Coastal | 173,616,805 |
| 39 | Cox Wood of Alabama | Wood Preservation | Woodstock | AL | Cahaba | 167,505,876 |
| 40 | Stella-Jones Corp. | Wood Preservation | Whitmire | SC | Tyger | 163,465,200 |
| 41 | Envirite of Illinois Inc. | Hazardous Waste Treatment and Disposal | Harvey | IL | Chicago | 154,093,908 |
| 42 | International Paper Georgetown Mill | Pulp Mills | Georgetown | SC | Carolina Coastal- Sampit | 148,037,860 |
| 43 | USS Gary Works | Iron and Steel Mills and Ferroalloy Manufacturing | Gary | IN | Little Calumet-Galien | 138,195,324 |
| 44 | Harrison Power Station | Fossil Fuel Electric Power Generation | Haywood | WV | West Fork | 138,015,744 |
| 45 | Duke Energy Progress LLC - Roxboro Steam Electric Plant | Fossil Fuel Electric Power Generation | Semora | NC | Lower Dan | 137,975,790 |
| 46 | Georgia-Pacific Cedar Springs | Paperboard Mills | Cedar Springs | GA | Lower Chattahoochee | 136,157,450 |
| 47 | Clean Harbors Deer Park LLC | Hazardous Waste Treatment and Disposal | La Porte | ТХ | Buffalo-San Jacinto | 133,513,216 |
| 48 | E. C. Gaston Electric Generating Plant | Fossil Fuel Electric Power Generation | Wilsonville | AL | Lower Coosa | 131,473,298 |
| 49 | Kentucky Utilities Co. Ghent Station | Fossil Fuel Electric Power Generation | Ghent | KY | Middle Ohio-Laughery | 130,241,882 |
| 50 | Barry Steam Plant | Fossil Fuel Electric Power Generation | Bucks | AL | Mobile-Tensaw | 126,331,439 |

TABLE B-3. TOP FACILITY IN EACH STATE AND TERRITORY BY TOTAL TOXICS RELEASED, 2020

| State or territory | Facility | Industry | City | Receiving watershed | Total toxics released (lbs.) |
|-----------------------|--|--|----------------------|---------------------------------------|------------------------------|
| Alabama | Koch Foods of Gadsden | Poultry Processing | Gadsden | Middle Coosa | 1,437,107 |
| Alaska | Coeur Alaska Inc. Kensington Gold Project | Gold Ore Mining | Juneau | Lynn Canal | 405,060 |
| Arizona | Freeport-McMoRan Miami Inc. | Nonferrous Metal (except Aluminum) Smelting and Refining | Claypool | Upper Salt | 781 |
| Arkansas | Tyson Chicken Inc Hope Processing Plant | Poultry Processing | Норе | McKinney-Posten Bayous | 894,224 |
| California | Martinez Refining Co. LLC | Petroleum Refineries | Martinez | Suisun Bay | 812,278 |
| Colorado | Cargill Meat Solutions Corp. | Animal (except Poultry) Slaughtering | Fort Morgan | Middle South Platte- Sterling | 576,957 |
| Connecticut | Allnex USA Inc. Wallingford CT Site | Plastics Material and Resin Manufacturing | Wallingford | Quinnipiac | 8,797 |
| Delaware | Delaware City Refinery | Petroleum Refineries | Delaware City | Brandywine-Christina | 6,190,936 |
| District of Columbia | Fort Totten Ready Mix Concrete | Ready-Mix Concrete Manufacturing | Washington | Middle Potomac-Anacostia- Occoquan | 978 |
| Florida ⁸⁵ | Foley Cellulose LLC | Pulp Mills | Perry | Econfina-Steinhatchee | 281,610 |
| Georgia | BASF Corp. Attapulgus Ops | Ground or Treated Mineral and Earth Manufacturing | Attapulgus | Lower Ochlockonee | 1,475,100 |
| Guam | Naval Base Guam-Apra Harbor WWTP | National Security | Santa Rita | Guam | 242,762 |
| Hawaii | Joint Base Pearl Harbor-Hickam Hawaii | National Security | Pearl Harbor | Oahu | 450,000 |
| Idaho | McCain Foods USA Inc. | Frozen Fruit, Juice, and Vegetable Manufacturing | Burley | Lake Walcott | 3,866,978 |
| Illinois | Tyson Fresh Meats Inc Joslin II | Animal (except Poultry) Slaughtering | Hillsdale | Lower Rock | 3,068,370 |
| Indiana | Cleveland-Cliffs Steel Corp. (Rockport Works) | Iron and Steel Mills and Ferroalloy Manufacturing | Rockport | Lower Ohio-Little Pigeon | 11,929,737 |
| lowa | Tyson Fresh Meats IncLouisa County | Animal (except Poultry) Slaughtering | Columbus Junction | Lower Iowa | 1,304,961 |
| Kansas | Creekstone Farms Premium Beef LLC | Animal (except Poultry) Slaughtering | Arkansas City | Lower Walnut River | 1,137,220 |
| Kentucky | North American Stainless | Iron and Steel Mills and Ferroalloy Manufacturing | Ghent | Middle Ohio-Laughery | 3,363,350 |
| Louisiana | CF Industries Nitrogen LLC | Nitrogenous Fertilizer Manufacturing | Donaldsonville | East Central Louisiana Coastal | 1,576,607 |
| Maine | McCain Foods USA Inc. | Frozen Fruit, Juice, and Vegetable Manufacturing | Easton | Becaguimec Stream-Saint John River | 2,031,077 |
| Maryland | Grace Davison-Curtis Bay Works | Other Basic Inorganic Chemical Manufacturing | Baltimore | Gunpowder-Patapsco | 79,059 |

| State or territory | Facility | Industry | City | Receiving watershed | Total toxics released (lbs.) |
|--------------------|---|--|-----------------|------------------------------|---------------------------------|
| Massachusetts | Hollingsworth & Vose Co. West Groton | Paper (except Newsprint) Mills | West Groton | Nashua River | 1,552 |
| Michigan | JBS Plainwell | Animal (except Poultry) Slaughtering | Plainwell | Kalamazoo | 2,515,483 |
| Minnesota | 3M Cottage Grove Center | All Other Miscellaneous Chemical Product and Preparation Manufacturing | Cottage Grove | Twin Cities | 744,103 |
| Mississippi | Tyson Farms Inc Carthage MS Processing Plant | Poultry Processing | Carthage | Upper Pearl | 2,224,631 |
| Missouri | Biokyowa Inc. | Other Animal Food Manufacturing | Cape Girardeau | Little River Ditches | 1,170,777 |
| Montana | CHS Inc. Laurel Refinery | Petroleum Refineries | Laurel | Upper Yellowstone-Lake Basin | 21,147 |
| Nebraska | Tyson Fresh Meats Inc. | Animal (except Poultry) Slaughtering | Lexington | Middle Platte-Buffalo | 2,660,028 |
| Nevada | Nevada Gold Mines LLC - Turquoise Ridge | Gold Ore Mining | Golconda | Middle Humboldt | 895 |
| New Hampshire | Merrimack Station | Fossil Fuel Electric Power Generation | Bow | Merrimack River | 192 |
| New Jersey | Phillips 66 CoBayway Refinery | Petroleum Refineries | Linden | Sandy Hook-Staten Island | 2,624,639 |
| New Mexico | US DOD USAF Holloman AFB | National Security | Holloman AFB | Tularosa Valley | 184,284 |
| New York | Anheuser-Busch LLC | Breweries | Baldwinsville | Oswego | 1,151,719 |
| North Carolina | Smithfield-Tar Heel | Animal (except Poultry) Slaughtering | Tar Heel | Lower Cape Fear | 4,766,415 |
| North Dakota | Cargill Inc. Wet Corn Milling – Wahpeton | Wet Corn Milling | Wahpeton | Upper Red | 68,155 |
| Ohio | Cleveland-Cliffs Steel Corp. | Iron and Steel Mills and Ferroalloy Manufacturing | Coshocton | Muskingum | 4,636,828 |
| Oklahoma | Pryor Solae | Soybean and Other Oilseed Processing | Pryor | Lower Neosho | 2,248,189 |
| Oregon | Siltronic Corp. | Semiconductor and Related Device Manufacturing | Portland | Lower Willamette | 430,930 |
| Pennsylvania | USS-Clairton Plant | All Other Petroleum and Coal Products Manufacturing | Clairton | Lower Monongahela | 2,135,786 |
| Puerto Rico | PREPA - Aguirre Power Generation Complex | Fossil Fuel Electric Power Generation | Aguirre | Southern Puerto Rico | 696 |
| Rhode Island | Toray Plastics (America) Inc. | Unlaminated Plastics Film and Sheet (except Packaging) Manufacturing | North Kingstown | Narragansett | 101 |
| South Carolina | Invista Camden Plant | Artificial and Synthetic Fibers and Filaments Manufacturing | Lugoff | Wateree | 660,310 |

| State or territory | Facility | Industry | City | Receiving watershed | Total toxics released (lbs.) |
|--------------------|--|--|------------------|-----------------------------------|------------------------------|
| South Dakota | Smithfield Packaged Meats Corp Sioux Falls | Animal (except Poultry) Slaughtering | Sioux Falls | Lower Big Sioux | 4,507,529 |
| Tennessee | Eastman Chemical Co. Tennessee Operations | Plastics Material and Resin Manufacturing | Kingsport | South Fork Holston | 1,038,266 |
| Texas | Pilgrim's Pride Corp. Mt. Pleasant Complex | Poultry Processing | Mount Pleasant | Lake O' the Pines | 2,694,056 |
| Utah | Chevron Products Co Salt Lake Refinery | Petroleum Refineries | Salt Lake City | Jordan | 122,669 |
| Vermont | GlobalFoundries US 2 LLC - Vermont Facility | Semiconductor and Related Device Manufacturing | Essex Junction | Winooski River | 119,956 |
| Virgin Islands | Limetree Bay Refining & Terminals LLC | Petroleum Refineries | Christiansted | St. Croix | 58,675 |
| Virginia | US Army Radford Army Ammunition Plant | National Security | Radford | Upper New | 10,266,136 |
| Washington | Lamb Weston Inc. Richland Facility | Frozen Fruit, Juice, and Vegetable Manufacturing | Richland | Upper Columbia-Priest Rapids | 1,510,660 |
| West Virginia | Cytec Industries Inc. | All Other Basic Organic Chemical Manufacturing | Willow Island | Little Muskingum-Middle Island | 503,460 |
| Wisconsin | McCain Foods USA Inc. | Frozen Fruit, Juice, and Vegetable Manufacturing | Wisconsin Rapids | Castle Rock | 1,019,567 |
| Wyoming | Western Sugar Cooperative Lovell Factory | Beet Sugar Manufacturing | Lovell | Shoshone | 4,636 |

TABLE B-4. TOP FACILITY IN EACH STATE AND TERRITORY BY TOXICITY-WEIGHTED RELEASES, 2020

| State or territory | Facility | Industry | City | Receiving watershed | Toxicity-weighted releases (lbs eq.) |
|----------------------|--|--|----------------|---------------------------------------|--------------------------------------|
| Alabama | Ascend Performance Materials Operations LLC-Decatur Plant | All Other Basic Organic Chemical Manufacturing | Decatur | Wheeler Lake | 480,395,930 |
| Alaska | Pogo Mine | Gold Ore Mining | Delta Junction | Healy Lake-Tanana River | 115,777,491 |
| Arizona | Freeport-McMoRan Miami Inc. | Nonferrous Metal (except Aluminum) Smelting and Refining | Claypool | Upper Salt | 8,382,655 |
| Arkansas | Domtar AW LLC Ashdown Mill | Paper (except Newsprint) Mills | Ashdown | Lower Little Arkansas, Oklahoma | 83,204,021 |
| California | Chevron Products Co. Div. of Chevron USA Inc | Petroleum Refineries | El Segundo | San Gabriel | 9,942,703 |
| Colorado | EVRAZ Rocky Mountain Steel | Iron and Steel Mills and Ferroalloy Manufacturing | Pueblo | Upper Arkansas | 3,350,271 |
| Connecticut | Colt's Manufacturing Co. LLC | Small Arms, Ordnance, and Ordnance Accessories Manufacturing | West Hartford | Outlet Connecticut River | 3,495,060 |
| Delaware | Delaware City Refinery | Petroleum Refineries | Delaware City | Brandywine-Christina | 7,838,957 |
| District of Columbia | Fort Totten Ready Mix Concrete | Ready-Mix Concrete Manufacturing | Washington | Middle Potomac-Anacostia- Occoquan | 616 |
| Florida | Foley Cellulose LLC ⁸⁶ | Pulp Mills | Perry | Econfina-Steinhatchee | 85,341,045 |
| Georgia | Arch Wood Protection Inc. | Pesticide and Other Agricultural Chemical Manufacturing | Conley | Upper Ocmulgee | 1,019,990,697 |
| Guam | Naval Base Guam - Apra Harbor WWTP | National Security | Santa Rita | Guam | 152,940 |
| Hawaii | Par West Refinery | Petroleum Refineries | Kapolei | Oahu | 443,079 |
| Idaho | Clearwater Paper CorpPPD & CPD Idaho | Pulp Mills | Lewiston | Clearwater | 119,178,999 |
| Illinois | Olin Winchester LLC Main Plant | Small Arms Ammunition Manufacturing | East Alton | Peruque-Piasa | 259,111,365 |
| Indiana | Duke Energy Indiana Inc Cayuga Generating Station | Fossil Fuel Electric Power Generation | Cayuga | Middle Wabash-Little Vermilion | 6,183,336,100 |
| lowa | Modernfold Inc. | Showcase, Partition, Shelving, and Locker Manufacturing | Dyersville | Maquoketa | 87,552,200 |
| Kansas | Coffeyville Resources Refining & Marketing | Petroleum Refineries | Coffeyville | Middle Verdigris | 9,328,159 |
| Kentucky | Louisville Gas & Electric Co Mill Creek Station | Fossil Fuel Electric Power Generation | Louisville | Salt | 244,535,847 |

| State or territory | Facility | Industry | City | Receiving watershed | Toxicity-weighted releases (lbs eq.) |
|--------------------|--|--|------------------------|--------------------------------------|--------------------------------------|
| Louisiana | Honeywell International Inc. Geismar Plant | Industrial Gas Manufacturing | Carville | Lake Maurepas | 5,962,610,293 |
| Maine | Sappi NA Inc Somerset Operations | Paper (except Newsprint) Mills | Skowhegan | Lower Kennebec River | 52,462,371 |
| Maryland | US Gypsum Co. * | Gypsum Product Manufacturing | Baltimore | Gunpowder-Patapsco | 241,340 |
| Massachusetts | Wyman-Gordon Co. | Nonferrous Forging | North Grafton | Blackstone River | 5,870,434 |
| Michigan | DTE Electric Co Monroe Power Plant | Fossil Fuel Electric Power Generation | Monroe | Ottawa-Stony | 871,987,528 |
| Minnesota | Boise White Paper LLC | Paper (except Newsprint) Mills | International Falls | Lower Rainy | 41,514,817 |
| Mississippi | Chevron Products Co. Pascagoula Refinery | Petroleum Refineries | Pascagoula | Mississippi Coastal | 173,616,805 |
| Missouri | Buick Resource Recycling Facility LLC | Secondary Smelting, Refining, and Alloying of Nonferrous Metal (except Copper and Aluminum) | Boss | Meramec | 196,222,513 |
| Montana | ExxonMobil Billings Refinery | Petroleum Refineries | Billings | Upper Yellowstone- Pompeys Pillar | 334,952 |
| Nebraska | City of Fremont Department of Utilities Lon D. Wright Power | Fossil Fuel Electric Power Generation | Fremont | Lower Elkhorn | 1,819,125 |
| Nevada | Nevada Gold Mines LLC - Turquoise Ridge | Gold Ore Mining | Golconda | Middle Humboldt | 84,365,442 |
| New Hampshire | Sturm Ruger & Co. Inc. | Small Arms, Ordnance, and Ordnance Accessories Manufacturing | Newport | Black River-Connecticut River | 126,591 |
| New Jersey | Phillips 66 Co Bayway Refinery | Petroleum Refineries | Linden | Sandy Hook-Staten Island | 29,319,243 |
| New Mexico | US DOD USAF Kirtland Air Force Base | National Security | Kirtland Afb | Rio Grande-Albuquerque | 1,101,600 |
| New York | International Paper | Paper (except Newsprint) Mills | Ticonderoga | Lake Champlain | 68,527,804 |
| North Carolina | Duke Energy Carolinas LLC - Marshall Steam Station | Fossil Fuel Electric Power Generation | Terrell | Upper Catawba | 196,651,502 |
| North Dakota | Cargill Inc. Wet Corn Milling - Wahpeton | Wet Corn Milling | Wahpeton | Upper Red | 121,357,620 |
| Ohio | Cardinal Plant | Fossil Fuel Electric Power Generation | Brilliant | Upper Ohio-Wheeling | 1,682,024,696 |
| Oklahoma | OGE Energy Corp. River Valley Generating Station | Fossil Fuel Electric Power Generation | Panama | Poteau | 119,657,533 |
| Oregon | Georgia-Pacific Toledo LLC | Paperboard Mills | Toledo | Siletz-Yaquina | 89,617,610 |
| Pennsylvania | Holcim (US) Inc Whitehall Plant | Cement Manufacturing | Whitehall | Lehigh | 756,592,400 |
| Puerto Rico | PREPA - Aguirre Power Generation Complex | Fossil Fuel Electric Power Generation | Aguirre | Southern Puerto Rico | 12,230,303 |

* See note on title page.

| State or territory | Facility | Industry | City | Receiving watershed | Toxicity-weighted releases (lbs eq.) |
|--------------------|--|--|-----------------|---------------------------|--------------------------------------|
| Rhode Island | ExxonMobil Oil Corp. East Providence Terminal | Petroleum Bulk Stations and Terminals | East Providence | Narragansett | 225,063 |
| South Carolina | DAK Americas LLC Cooper River Plant | Plastics Material and Resin Manufacturing | Moncks Corner | Cooper | 1,372,652,836 |
| South Dakota | Smithfield Packaged Meats Corp Sioux Falls | Animal (except Poultry) Slaughtering | Sioux Falls | Lower Big Sioux | 2,842,765 |
| Tennessee | Eastman Chemical Co. Tennessee Operations | Plastics Material and Resin Manufacturing | Kingsport | South Fork Holston | 967,805,244 |
| Texas | Dow Chemical Co. Freeport Facility | All Other Basic Organic Chemical Manufacturing | Freeport | Austin-Oyster | 38,309,002,758 |
| Utah | Kennecott Utah Copper Smelter & Refinery | Nonferrous Metal (except Aluminum) Smelting and Refining | Magna | Jordan | 1,049,112,845 |
| Vermont | GlobalFoundries US 2 LLC - Vermont Facility | Semiconductor and Related Device Manufacturing | Essex Junction | Winooski River | 71,951 |
| Virgin Islands | Limetree Bay Refining & Terminals LLC | Petroleum Refineries | Christiansted | St. Croix | 10,617,900 |
| Virginia | US Army Radford Army Ammunition Plant | National Security | Radford | Upper New | 31,725,710,403 |
| Washington | Nippon Dynawave Packaging Co. | Pulp Mills | Longview | Lower Columbia-Clatskanie | 357,390,574 |
| West Virginia | APG Polytech LLC | Plastics Material and Resin Manufacturing | Apple Grove | Raccoon-Symmes | 4,442,086,541 |
| Wisconsin | NextEra Energy Point Beach LLC | Nuclear Electric Power Generation | Two Rivers | Manitowoc-Sheboygan | 45,021,000,000 |
| Wyoming | Black Hills Corp Neil Simpson Complex | Fossil Fuel Electric Power Generation | Gillette | Upper Belle Fourche | 2,069,634 |

Appendix C: Toxic releases to waterways by industry and parent company

TABLE C-1. TOP 20 INDUSTRIES FOR TOXIC RELEASES (RANKED BY WEIGHT), 2020

| Total Rank | Industry | 2017 NAICS Code | Total toxics released (lbs.) | Toxicity-weighted releases (lbs. eq.) |
|---------------|---|-----------------|------------------------------|---------------------------------------|
| 1 | Poultry Processing | 311615 | 28,782,512 | 25,341,823 |
| 2 | Petroleum Refineries | 324110 | 26,691,990 | 962,756,698 |
| 3 | Animal (except Poultry) Slaughtering | 311611 | 24,579,860 | 18,730,255 |
| 4 | Iron and Steel Mills and Ferroalloy Manufacturing | 331110 | 23,189,166 | 342,222,897 |
| 5 | National Security | 928110 | 12,464,065 | 31,758,472,374 |
| 6 | Frozen Fruit, Juice, and Vegetable Manufacturing | 311411 | 8,462,807 | 5,310,587 |
| 7 | Paper (except Newsprint) Mills | 322121 | 7,546,807 | 1,094,695,527 |
| 8 | All Other Basic Organic Chemical Manufacturing | 325199 | 6,814,680 | 39,781,206,974 |
| 9 | Rendering and Meat Byproduct Processing | 311613 | 6,398,898 | 5,089,643 |
| 10 | Nitrogenous Fertilizer Manufacturing | 325311 | 5,718,865 | 11,182,780 |
| 11 | Pulp Mills | 322110 | 4,352,753 | 1,606,464,236 |
| 12 | Paperboard Mills | 322130 | 3,600,214 | 1,208,096,597 |
| 13 | All Other Petroleum and Coal Products Manufacturing | 324199 | 2,572,232 | 16,571,409 |
| 14 | Plastics Material and Resin Manufacturing | 325211 | 2,514,162 | 7,459,931,978 |
| 15 | Fossil Fuel Electric Power Generation | 221112 | 2,315,358 | 14,175,054,418 |
| 16 | Soybean and Other Oilseed Processing | 311224 | 2,250,316 | 1,987,167 |
| 17 | Meat Processed from Carcasses | 311612 | 1,718,992 | 1,093,644 |
| 18 | Ground or Treated Mineral and Earth Manufacturing | 327992 | 1,638,644 | 2,118,545 |
| 19 | Cheese Manufacturing | 311513 | 1,632,564 | 73,532,836 |
| 20 | Other Basic Inorganic Chemical Manufacturing | 325180 | 1,457,177 | 757,874,788 |

TABLE C-2. TOP 20 PARENT COMPANIES BYTOTAL TOXIC CHEMICALS RELEASED, 202087

| Parent company or facility name | Total chemicals released (lbs.) |
|--------------------------------------|------------------------------------|
| Tyson Foods Inc. | 18,414,255 |
| Cleveland-Cliffs Inc. | 17,312,275 |
| US Department of Defense | 12,388,453 |
| United Global Foods US Holdings Inc. | 10,976,028 |
| JBS USA Food Co. | 10,467,626 |
| PBF Energy Inc. | 7,693,111 |
| McCain Foods USA Inc. | 6,917,622 |
| Sanderson Farms Inc. | 5,893,825 |
| Koch Industries Inc. | 5,716,541 |
| Perdue Farms Inc. | 5,268,456 |
| Phillips 66 Co. | 4,718,943 |
| Valero Energy Corp. | 4,272,591 |
| BASF Corp. | 3,454,722 |
| North American Stainless | 3,363,350 |
| CF Industries Holdings Inc. | 3,319,532 |
| International Paper Co. | 3,214,543 |
| Cargill Inc. | 3,040,374 |
| US Steel Corp. | 2,609,527 |
| Dupont De Nemours Inc. | 2,392,256 |
| Exxon Mobil Corp. | 2,351,642 |

TABLE C-3. TOP 20 PARENT COMPANIES BYTOXICITY-WEIGHTED CHEMICALS RELEASED, 202088

| Parent company or facility name | Toxicity-weighted chemicals released (lbs. eq.) |
|------------------------------------|---|
| NextEra Energy Inc. | 45,021,037,511 |
| Dow Inc. | 38,969,647,526 |
| US Department of Defense | 31,758,499,191 |
| Duke Energy Corp. | 6,603,750,310 |
| Honeywell International Inc. | 5,970,249,475 |
| APG Polytech Holding | 4,442,086,541 |
| BASF Corp | 1,959,869,801 |
| Buckeye Power Inc. | 1,682,024,696 |
| Dak Americas LLC | 1,564,680,481 |
| Rio Tinto America Inc. | 1,455,203,627 |
| Koch Industries Inc. | 1,097,730,299 |
| Lonza America Inc. | 1,019,990,697 |
| Eastman Chemical Co. | 983,749,433 |
| Denka Performance Elastomer LLC | 892,889,233 |
| DTE Energy Co. | 881,803,527 |
| American Electric Power | 871,418,001 |
| Holcim (US) Inc. | 756,772,048 |
| Westlake Chemical Corp. | 711,514,339 |
| Vistra Corp. | 693,041,673 |
| Keystone-Conemaugh Projects LLC | 679,614,057 |

Appendix D: Toxic chemicals and human health effects

TABLE D-1. TOXIC CHEMICALS BY TOTAL RELEASES, TOXICITY-WEIGHTED RELEASES, TOXICITY WEIGHT AND CERTAIN HEALTH EFFECTS, 2020⁸⁹

| Chemical | CAS number | Total chemicals released (lbs.) | Toxicity-weighted chemicals released (lbs. eq.) | Toxicity weight | Cancer effects | Developmental effects | Reproductive effects |
|--|------------|---------------------------------------|---|-----------------|-------------------|--------------------------|-------------------------|
| 1-Chloro-1,1-difluoroethane | 75-68-3 | 3,276.9 | 229.4 | 0.1 | | | |
| 1-Propanesulfonic acid, 2-methyl-, 2-[[1-oxo-3-[(γ-ω-perfluoro-C4-16-alkyl) thio]propyl]amino] derivs., sodium salts | 68187-47-3 | 6.0 | 0.0 | 0.0 | | | |
| 1,1-Dichloro-1-fluoroethane | 1717-00-6 | 169.0 | 0.0 | 0.0 | | | |
| 1,1,1-Trichloroethane | 71-55-6 | 3,619.0 | 1,809.5 | 0.5 | | | |
| 1,1,1,2-Tetrachloroethane | 630-20-6 | 66.0 | 171,600.0 | 2,600.0 | Х | | |
| 1,1,2-Trichloroethane | 79-00-5 | 8.3 | 47,481.0 | 5,700.0 | Х | | |
| 1,2-Butylene oxide | 106-88-7 | 1.0 | 180.0 | 180.0 | | | |
| 1,2-Dibromoethane | 106-93-4 | 70.0 | 140,000,000.0 | 2,000,000.0 | Х | Х | Х |
| 1,2-Dichloro-1,1-difluoroethane | 1649-08-07 | 15.0 | 0.0 | 0.0 | | | |
| 1,2-Dichlorobenzene | 95-50-1 | 1.0 | 11.0 | 11.0 | | | |
| 1,2-Dichloroethane | 107-06-02 | 6,789.4 | 617,835,400.0 | 91,000.0 | Х | | |
| 1,2-Dichloroethylene | 540-59-0 | 33.0 | 3,630.0 | 110.0 | | | |
| 1,2-Dichloropropane | 78-87-5 | 124.2 | 4,596,881.0 | 37,000.0 | Х | | |
| 1,2,3-Trichloropropane | 96-18-4 | 1,127.0 | 33,810,000,000.0 | 30,000,000.0 | Х | | |
| 1,2,4-Trimethylbenzene | 95-63-6 | 1,432.4 | 143,240.8 | 100.0 | | | |
| 1,3-Butadiene | 106-99-0 | 1,131.5 | 124,465,000.0 | 110,000.0 | Х | Х | Х |
| 1,3-Dichloropropylene | 542-75-6 | 1,061.0 | 106,100,000.0 | 100,000.0 | Х | | |
| 1,4-Dichloro-2-butene | 764-41-0 | 96.0 | 892,800,000.0 | 9,300,000.0 | Х | | |
| 1,4-Dichlorobenzene | 106-46-7 | 5.0 | 12,000.0 | 2,400.0 | Х | | |
| 2-Chloro-1,1,1-trifluoroethane | 75-88-7 | 40.0 | 0.0 | 0.0 | | | |
| 2-Mercaptobenzothiazole | 149-30-4 | 2,794.0 | 30,734,000.0 | 11,000.0 | Х | | |
| 2-Nitrophenol | 88-75-5 | 65.0 | 0.0 | 0.0 | | | |
| 2,4-D ((2,4-dichlorophenoxy)acetic acid) | 94-75-7 | 225.8 | 45,154.0 | 200.0 | | | |
| 2,4-Dimethylphenol | 105-67-9 | 351.8 | 17,589.1 | 50.0 | | | |
| 4,4'-Diaminodiphenylether | 101-80-4 | 293.0 | 41,020,000.0 | 140,000.0 | Х | | |
| 4,4'-Isopropylidenediphenol | 80-05-7 | 1,380.4 | 27,608.0 | 20.0 | | Х | Х |
| 4,4'-Methylenedianiline | 101-77-9 | 3,300.0 | 5,280,000,000.0 | 1,600,000.0 | Х | | |

| Chemical | CAS number | Total chemicals released (lbs.) | Toxicity-weighted chemicals released (lbs. eq.) | Toxicity weight | Cancer effects | Developmental effects | Reproductive effects |
|-----------------------------------|-------------|---------------------------------------|---|-----------------|-------------------|--------------------------|-------------------------|
| Acetaldehyde | 75-07-0 | 304,754.6 | 2,407,561,342.6 | 7,900.0 | Х | | |
| Acetamide | 60-35-5 | 255.0 | 1,810,500.0 | 7,100.0 | Х | | |
| Acetonitrile | 75-05-8 | 1,909.6 | 110,756.8 | 58.0 | | | |
| Acetophenone | 98-86-2 | 779.1 | 7,791.0 | 10.0 | | | |
| Acrolein | 107-02-08 | 581.0 | 1,162,000.0 | 2,000.0 | | | |
| Acrylamide | 79-06-1 | 754.0 | 377,000,000.0 | 500,000.0 | Х | Х | Х |
| Acrylic acid | 79-10-7 | 5,164.0 | 10,328.0 | 2.0 | | | |
| Acrylonitrile | 107-13-1 | 292.3 | 157,858,200.0 | 540,000.0 | Х | | |
| Allyl alcohol | 107-18-6 | 22,944.0 | 4,588,800.0 | 200.0 | | | |
| Allyl chloride | 0107-05-01 | 3.0 | 10,500.0 | 3,500.0 | | | |
| Aluminum oxide (fibrous forms) | 1344-28-1 | 170.4 | 0.0 | 0.0 | | | |
| Ammonia | 7664-41-7 | 3,712,937.2 | 0.0 | 0.0 | | | |
| Aniline | 62-53-3 | 455.1 | 2,594,070.0 | 5,700.0 | Х | | |
| Anthracene | 0120-12-7 | 272.3 | 898.5 | 3.3 | | | |
| Antimony | 7440-36-0 | 148.6 | 371,425.0 | 2,500.0 | | | |
| Antimony and antimony compounds | N010 | 5,031.6 | 12,578,964.3 | 2,500.0 | | | |
| Arsenic | 7440-38-2 | 4,222.2 | 6,333,285,000.0 | 1,500,000.0 | Х | Х | |
| Arsenic and arsenic compounds | N020 | 11,446.1 | 17,169,220,545.0 | 1,500,000.0 | Х | Х | |
| Atrazine | 1912-24-9 | 85.6 | 4,791.4 | 56.0 | | Х | Х |
| Barium | 7440-39-3 | 1,500.0 | 7,499.8 | 5.0 | | | |
| Barium and barium compounds | N040 | 490,927.7 | 2,454,639.1 | 5.0 | | | |
| Benzene | 71-43-2 | 3,678.0 | 202,287,335.9 | 55,000.0 | Х | Х | Х |
| Benzo(g,h,i)perylene | 191-24-2 | 196.9 | 3,938,444.1 | 20,000.0 | | | |
| Benzoyl chloride | 98-88-4 | 5.0 | 0.0 | 0.0 | | | |
| Benzyl chloride | 100-44-7 | 7.0 | 1,190,000.0 | 170,000.0 | Х | | |
| Beryllium | 7440-41-7 | 2.7 | 1,325.0 | 500.0 | Х | | |
| Beryllium and beryllium compounds | N050 | 261.9 | 130,930.0 | 500.0 | Х | | |
| Bifenthrin | 82657-04-03 | 3.3 | 820.0 | 250.0 | | | |
| Biphenyl | 92-52-4 | 661.7 | 529,338.4 | 800.0 | | | |
| Bis(2-chloro-1-methethyl)ether | 108-60-1 | 150.0 | 0.0 | 0.0 | Х | | |
| Bis(2-chloroethyl)ether | 111-44-4 | 3.1 | 3,355,000.0 | 1,100,000.0 | Х | | |
| Bromomethane (Methyl bromide) | 74-83-9 | 191.0 | 9,550.0 | 50.0 | | Х | |
| Butyl acrylate | 141-32-2 | 6.9 | 13.7 | 2.0 | | | |

| Chemical | CAS number | Total chemicals released (lbs.) | Toxicity-weighted chemicals released (lbs. eq.) | Toxicity weight | Cancer effects | Developmental effects | Reproductive effects |
|---------------------------------|------------|---------------------------------------|---|-----------------|-------------------|--------------------------|-------------------------|
| Butyraldehyde | 123-72-8 | 48,495.0 | 0.0 | 0.0 | | | |
| C.I. Direct Blue 218 | 28407-37-6 | 3,330.0 | 0.0 | 0.0 | Х | | |
| Cadmium | 7440-43-9 | 91.2 | 182,380.0 | 2,000.0 | Х | Х | Х |
| Cadmium and cadmium compounds | N078 | 1,143.9 | 2,287,850.8 | 2,000.0 | Х | Х | Х |
| Captan | 133-06-02 | 5.0 | 6,000.0 | 1,200.0 | Х | | |
| Carbaryl | 63-25-2 | 11.0 | 9,680.0 | 880.0 | Х | Х | Х |
| Carbon disulfide | 75-15-0 | 7,426.8 | 74,268.4 | 10.0 | | Х | Х |
| Carbon tetrachloride | 56-23-5 | 108.0 | 7,560,000.0 | 70,000.0 | Х | | |
| Carbonyl sulfide | 463-58-1 | 356.0 | 124,600.0 | 350.0 | | | |
| Catechol | 120-80-9 | 6,152.1 | 55,368,451.0 | 9,000.0 | Х | | |
| CFC-11 (trichlorofluoromethane) | 75-69-4 | 30.0 | 99.0 | 3.3 | | | |
| Chlorine | 7782-50-5 | 114,480.3 | 1,144,803.1 | 10.0 | | | |
| Chloroacetic acid | 79-11-8 | 482.0 | 241,000.0 | 500.0 | | | |
| Chlorobenzene | 108-90-7 | 135.3 | 6,763.5 | 50.0 | | | |
| Chloroethane (Ethyl chloride) | 75-00-3 | 232.0 | 81.2 | 0.4 | Х | | |
| Chloroform | 67-66-3 | 4,812.4 | 29,355,457.0 | 6,100.0 | Х | Х | |
| Chloromethane | 74-87-3 | 232.1 | 301,730.0 | 1,300.0 | | Х | Х |
| Chloroprene | 126-99-8 | 187.0 | 9,350.0 | 50.0 | Х | | |
| Chlorothalonil | 1897-45-6 | 36.1 | 277,970.0 | 7,700.0 | Х | | |
| Chromium | 7440-47-3 | 18,593.1 | 930,612,205.4 | 50,051.4 | | | |
| Chromium and chromium compounds | N090 | 37,681.8 | 3,380,599,952.7 | 89,714.4 | х | Х | Х |
| Cobalt | 7440-48-4 | 441.1 | 0.0 | 0.0 | Х | | |
| Cobalt and cobalt compounds | N096 | 82,580.3 | 0.0 | 0.0 | Х | | |
| Copper | 7440-50-8 | 15,321.0 | 22,981,519.6 | 1,500.0 | | | |
| Copper and copper compounds | N100 | 137,789.8 | 206,684,737.2 | 1,500.0 | | | |
| Creosote, coal tar | 8001-58-9 | 279.0 | 0.0 | 0.0 | Х | | |
| Cresol (mixed isomers) | 1319-77-3 | 2,135.6 | 42,711.3 | 20.0 | | | |
| Cumene | 98-82-8 | 2,423.0 | 24,230.3 | 10.0 | Х | | |
| Cumene hydroperoxide | 80-15-9 | 3,004.0 | 1,922,560.0 | 640.0 | | | |
| Cyanide compounds | N106 | 16,954.2 | 3,390,830.0 | 200.0 | | | Х |
| Cyclohexane | 110-82-7 | 3,508.5 | 2,034.9 | 0.6 | | | |
| Cyclohexanol | 108-93-0 | 55,652.0 | 0.0 | 0.0 | | | |
| Dazomet | 533-74-4 | 8.0 | 2,320.0 | 290.0 | | | |

| Chemical | CAS number | Total chemicals released (lbs.) | Toxicity-weighted chemicals released (lbs. eq.) | Toxicity weight | Cancer effects | Developmental effects | Reproductive effects |
|----------------------------------|------------|---------------------------------------|---|-----------------|-------------------|--------------------------|-------------------------|
| Di(2-ethylhexyl) phthalate | 117-81-7 | 406.4 | 5,689,740.0 | 14,000.0 | Х | Х | Х |
| Diaminotoluene (mixed isomers) | 25376-45-8 | 110.0 | 352,000,000.0 | 3,200,000.0 | Х | | |
| Diazinon | 333-41-5 | 5.0 | 25,000.0 | 5,000.0 | | | |
| Dibenzofuran | 132-64-9 | 25.0 | 0.0 | 0.0 | | | |
| Dicamba | 1918-00-9 | 18.0 | 39.6 | 2.2 | | | |
| Dichloromethane | 75-09-2 | 1,228.5 | 2,457,058.0 | 2,000.0 | Х | | |
| Dicyclopentadiene | 77-73-6 | 7.0 | 232.0 | 33.0 | | | |
| Diethanolamine | 111-42-2 | 26,833.7 | 19,051,928.6 | 710.0 | Х | | |
| Diisocyanates | N120 | 266.0 | 93,100,000.0 | 350,000.0 | | | |
| Dimethoate | 60-51-5 | 5.0 | 2,250.0 | 450.0 | | | |
| Dimethyl phthalate | 131-11-3 | 95.0 | 0.0 | 0.0 | | | |
| Dimethylamine | 124-40-3 | 23,990.0 | 0.0 | 0.0 | | | |
| Dinitrotoluene (mixed isomers) | 25321-14-6 | 46.0 | 0.0 | 0.0 | Х | | Х |
| Dioxane | 123-91-1 | 62,191.0 | 6,219,100,000.0 | 100,000.0 | Х | | |
| Dioxin and dioxin-like compounds | N150 | 2.7 | 11,717,448.6 | 4,406,743.3 | Х | | |
| Diphenylamine | 122-39-4 | 293.3 | 9,679.2 | 33.0 | | | |
| Dipotassium endothall | 2164-07-0 | 12,275.0 | 1,718,500.0 | 140.0 | | | |
| Diuron | 330-54-1 | 10.7 | 203,300.0 | 19,000.0 | Х | | |
| Epichlorohydrin | 106-89-8 | 5,149.0 | 50,975,100.0 | 9,900.0 | Х | | Х |
| Ethyl acrylate | 140-88-5 | 9.7 | 464,640.0 | 48,000.0 | Х | | |
| Ethylbenzene | 100-41-4 | 3,148.2 | 3,463,055.1 | 1,100.0 | Х | Х | |
| Ethylene | 74-85-1 | 13.0 | 7.3 | 0.6 | | | |
| Ethylene glycol | 107-21-1 | 318,589.2 | 159,294.5 | 0.5 | | Х | |
| Ethylene oxide | 75-21-8 | 1,385.0 | 304,700,000.0 | 220,000.0 | Х | Х | Х |
| Ethylidene dichloride | 75-34-3 | 1,000.0 | 5,000.0 | 5.0 | Х | | |
| Fomesafen | 72178-02-0 | 0.2 | 3,420.0 | 19,000.0 | | | |
| Formaldehyde | 50-00-0 | 222,700.6 | 1,113,503.4 | 5.0 | Х | | |
| Formic acid | 64-18-6 | 357,927.4 | 178,963.8 | 0.5 | | | |
| Glycidol | 556-52-5 | 16,756.0 | 0.0 | 0.0 | Х | | |
| Glycol ethers | N230 | 92,430.2 | 16,637,441.5 | 180.0 | | | |
| Hexachloro-1,3-butadiene | 87-68-3 | 27.0 | 210,600.0 | 7,800.0 | Х | | |
| Hexachlorobenzene | 118-74-1 | 110.4 | 176,698,080.0 | 1,600,000.0 | Х | Х | Х |
| Hexachlorocyclopentadiene | 77-47-4 | 0.0 | 5.1 | 170.0 | | | |

| Chemical | CAS number | Total chemicals released (lbs.) | Toxicity-weighted chemicals released (lbs. eq.) | Toxicity weight | Cancer effects | Developmental effects | Reproductive effects |
|---|------------|---------------------------------------|---|-----------------|-------------------|--------------------------|-------------------------|
| Hexachloroethane | 67-72-1 | 14.0 | 560,000.0 | 40,000.0 | Х | | |
| Hexafluoropropylene oxide dimer acid | 13252-13-6 | 12.0 | 0.0 | 0.0 | | | |
| Hexafluoropropylene oxide dimer acid ammonium salt | 62037-80-3 | 406.1 | 0.0 | 0.0 | | | |
| Hydrazine | 302-01-02 | 15,007.0 | 45,021,000,000.0 | 3,000,000.0 | Х | | |
| Hydrogen cyanide | 74-90-8 | 1,140.1 | 1,938,170.0 | 1,700.0 | | | Х |
| Hydrogen fluoride | 7664-39-3 | 982.8 | 24,570.6 | 25.0 | | | |
| Hydrogen sulfide | 6/4/83 | 206,939.0 | 372,490,001.2 | 1,800.0 | | | |
| Hydroquinone | 123-31-9 | 4,576.0 | 274,560,000.0 | 60,000.0 | | | |
| lsobutyraldehyde | 78-84-2 | 71.0 | 0.0 | 0.0 | | | |
| Isoprene | 78-79-5 | 455.0 | 0.0 | 0.0 | Х | | |
| Lead | 7439-92-1 | 13,614.6 | 245,063,208.5 | 18,000.0 | Х | Х | Х |
| Lead and lead compounds | N420 | 43,604.1 | 784,873,702.5 | 18,000.0 | Х | Х | Х |
| Lithium carbonate | 554-13-2 | 162.6 | 0.0 | 0.0 | | Х | Х |
| m-Cresol | 108-39-4 | 661.9 | 13,238.8 | 20.0 | | | |
| m-Xylene | 108-38-3 | 141.4 | 706.8 | 5.0 | | | |
| Malathion | 121-75-5 | 5.0 | 70.0 | 14.0 | Х | | |
| Maleic anhydride | 108-31-6 | 253.5 | 2,535.3 | 10.0 | | | |
| Manganese | 7439-96-5 | 158,205.1 | 1,123,257.2 | 7.1 | | | |
| Manganese and manganese compounds | N450 | 3,861,300.2 | 27,415,228.7 | 7.1 | | | |
| Mercury | 7439-97-6 | 861.5 | 8,615,214.2 | 10,000.0 | | Х | |
| Mercury and mercury compounds | N458 | 3,107.9 | 31,078,930.8 | 10,000.0 | | Х | |
| Methanol | 67-56-1 | 4,020,697.0 | 4,020,697.0 | 1.0 | | Х | |
| Methyl acrylate | 96-33-3 | 35.0 | 1,155.0 | 33.0 | Х | | |
| Methyl iodide | 74-88-4 | 12.0 | 3,480,000.0 | 290,000.0 | Х | | |
| Methyl isobutyl ketone | 108-10-1 | 10,313.7 | 134,078.4 | 13.0 | Х | Х | |
| Methyl methacrylate | 80-62-6 | 40.8 | 28.9 | 0.7 | | | |
| Methyl tert-butyl ether | 1634-04-04 | 3,480.6 | 323,695.8 | 93.0 | | | |
| Metribuzin | 21087-64-9 | 11.9 | 916.3 | 77.0 | | | |
| Molybdenum trioxide | 1313-27-5 | 28,439.2 | 10,806,903.6 | 380.0 | Х | | |
| n-Butyl alcohol | 71-36-3 | 33,228.1 | 332,281.4 | 10.0 | | | |
| n-Hexane | 110-54-3 | 3,510.2 | 59,673.7 | 17.0 | | | Х |
| N-methyl-2-pyrrolidone | 872-50-4 | 6,680.9 | 0.0 | 0.0 | | Х | Х |

| Chemical | CAS number | Total chemicals released (lbs.) | Toxicity-weighted chemicals released (lbs. eq.) | Toxicity weight | Cancer effects | Developmental effects | Reproductive effects |
|-------------------------------|-------------|---------------------------------------|---|-----------------|-------------------|--------------------------|-------------------------|
| N-methylolacrylamide | 924-42-5 | 5.0 | 0.0 | 0.0 | Х | | |
| N,N-Dimethylformamide | 68-12-2 | 2,539.0 | 25,390.0 | 10.0 | Х | | |
| Naphthalene | 91-20-3 | 4,356.3 | 217,814.0 | 50.0 | Х | | |
| Nickel | 7440-02-0 | 8,752.5 | 796,480.7 | 91.0 | Х | Х | Х |
| Nickel and nickel compounds | N495 | 50,960.7 | 4,637,423.6 | 91.0 | Х | Х | Х |
| Nicotine and salts | N503 | 29.0 | 0.0 | 0.0 | | Х | |
| Nitrate compounds | N511 | 175,751,834.3 | 110,723,632.5 | 0.6 | | | |
| Nitric acid | 7697-37-2 | 365,100.3 | 98,577,057.5 | 270.0 | | | |
| Nitroglycerin | 55-63-0 | 15,103.0 | 31,716,300,000.0 | 2,100,000.0 | | | |
| Nitromethane | 75-52-5 | 950.0 | 0.0 | 0.0 | Х | | |
| Nonylphenol | N530 | 53.6 | 0.0 | 0.0 | | | |
| Nonylphenol ethoxylates | N535 | 1,317.9 | 0.0 | 0.0 | | | |
| o-Anisidine | 90-04-0 | 20.0 | 1,600,000.0 | 80,000.0 | Х | | |
| o-Cresol | 95-48-7 | 140.2 | 2,804.0 | 20.0 | | | |
| o-Toluidine | 95-53-4 | 194.0 | 46,560,000.0 | 240,000.0 | Х | | |
| o-Xylene | 95-47-6 | 3,220.8 | 16,103.8 | 5.0 | | | |
| Octachlorostyrene | 29082-74-4 | 0.0 | 0.0 | 0.0 | | | |
| Oxyfluorfen | 42874-03-03 | 0.3 | 2,044.0 | 7,300.0 | | | |
| p-Chloroaniline | 106-47-8 | 116.0 | 12,760,000.0 | 110,000.0 | Х | | |
| p-Cresol | 106-44-5 | 292.5 | 58,500.0 | 200.0 | | | |
| p-Phenylenediamine | 106-50-3 | 53.0 | 53,000.0 | 1,000.0 | | | |
| p-Xylene | 106-42-3 | 40.4 | 202.2 | 5.0 | | | |
| Pendimethalin | 40487-42-1 | 5.1 | 50.5 | 10.0 | | | |
| Pentachlorobenzene | 608-93-5 | 131.3 | 170,691.0 | 1,300.0 | | | |
| Pentachlorophenol | 87-86-5 | 857.0 | 342,800,000.0 | 400,000.0 | Х | Х | Х |
| Perfluorohexanesulfonic acid | 355-46-4 | 6.4 | 0.0 | 0.0 | | | |
| Perfluorooctane sulfonic acid | 1763-23-1 | 1.2 | 0.0 | 0.0 | Х | Х | |
| Perfluorooctanoic acid | 335-67-1 | 8.5 | 0.0 | 0.0 | Х | Х | |
| Peroxyacetic acid | 79-21-0 | 2,752.1 | 12,384,451.0 | 4,500.0 | | | |
| Phenanthrene | 85-01-8 | 307.4 | 0.0 | 0.0 | | | |
| Phenol | 108-95-2 | 27,867.2 | 91,961.8 | 3.3 | | | |
| Phosphine | 7803-51-2 | 1.9 | 6,303.0 | 3,300.0 | | | |
| Phthalic anhydride | 85-44-9 | 26.0 | 13.0 | 0.5 | | | |

| Chemical | CAS number | Total chemicals released (lbs.) | Toxicity-weighted chemicals released (lbs. eq.) | Toxicity weight | Cancer effects | Developmental effects | Reproductive effects |
|--|------------|---------------------------------------|---|-----------------|-------------------|--------------------------|-------------------------|
| Picloram | 1918-02-1 | 22.0 | 110.0 | 5.0 | | | |
| Polychlorinated biphenyls (PCBs) | 1336-36-3 | 17.7 | 35,485,400.0 | 2,000,000.0 | Х | Х | |
| Polycyclic aromatic compounds | N590 | 5,037.4 | 906,731,514.0 | 180,000.0 | Х | | |
| Propionaldehyde | 123-38-6 | 14,503.0 | 6,381,320.0 | 440.0 | | | |
| Propylene (Propene) | 0115-07-01 | 64.0 | 76.8 | 1.2 | | | |
| Propylene oxide | 75-56-9 | 1,092.0 | 262,080,000.0 | 240,000.0 | Х | Х | |
| Pyridine | 110-86-1 | 56.0 | 56,000.0 | 1,000.0 | Х | | |
| sec-Butyl alcohol | 78-92-2 | 593.0 | 5,930.0 | 10.0 | | | |
| Selenium | 7782-49-2 | 848.6 | 169,723.2 | 200.0 | | | |
| Selenium and selenium compounds | N725 | 11,923.2 | 2,384,630.0 | 200.0 | | | |
| Silver | 7440-22-4 | 11.2 | 2,240.0 | 200.0 | | | |
| Silver and silver compounds | N740 | 1,153.2 | 230,648.0 | 200.0 | | | |
| Simazine | 122-34-9 | 15.0 | 180,000.0 | 12,000.0 | | Х | Х |
| Sodium nitrite | 7632-00-0 | 1,584,269.4 | 15,842,684.0 | 10.0 | | | |
| Styrene | 100-42-5 | 479.3 | 2,396.7 | 5.0 | Х | | |
| tert-Butyl alcohol | 75-65-0 | 3,580.0 | 179,000.0 | 50.0 | | | |
| Tetrabromobisphenol-A (TBBPA) | 79-94-7 | 11.0 | 0.0 | 0.0 | Х | Х | Х |
| Tetrachloroethylene (Perchloroethylene) | 127-18-4 | 958.4 | 2,012,598.0 | 2,100.0 | Х | | |
| Thallium | 7440-28-0 | 0.3 | 3,780.0 | 14,000.0 | | | |
| Thallium and thallium compounds | N760 | 516.0 | 7,224,000.0 | 14,000.0 | | | |
| Thiabendazole | 148-79-8 | 8,947.9 | 107,374,920.0 | 12,000.0 | | Х | |
| Thiram | 137-26-8 | 15.1 | 1,011.7 | 67.0 | | | |
| Toluene | 108-88-3 | 13,720.3 | 178,363.5 | 13.0 | | Х | |
| Trichloroethylene | 79-01-6 | 1,327.6 | 6,106,730.0 | 4,600.0 | Х | Х | Х |
| Triethylamine | 121-44-8 | 2,371.5 | 1,185,750.0 | 500.0 | | | |
| Trifluralin | 1582-09-08 | 0.3 | 215.6 | 770.0 | | | |
| Vanadium | 7440-62-2 | 3,277.3 | 458,820.6 | 140.0 | | | |
| Vanadium and vanadium compounds | N770 | 364,932.8 | 51,090,595.2 | 140.0 | | | |
| Vinyl acetate | 108-05-04 | 7,872.0 | 7,872.0 | 1.0 | Х | | |
| Vinyl chloride | 75-01-4 | 70.7 | 106,110,000.0 | 1,500,000.0 | Х | | |
| Vinylidene chloride (1,1-dichloroethylene) | 75-35-4 | 29.0 | 580.0 | 20.0 | Х | | |
| Xylene (mixed isomers) | 1330-20-7 | 13,434.6 | 67,172.8 | 5.0 | | | |
| Zinc and zinc compounds | N982 | 602,101.9 | 1,986,936.0 | 3.3 | | | |

Notes

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74 Earthjustice, EPA Sued over PFAS "Secrecy" Reporting Loopholes (press release), 20 January 2022, archived at https://web.archive.org/web/20220617150634/https://earthjustice.org/news/press/2022/epa-sued-over-pfas-secrecy-reporting-loopholes; Earthjustice, 2020 TRI Data: Report and Recommendations Regarding PFAS, December 2021, archived at http://web.archive.org/web/20220310152659/https://earthjustice.org/sites/default/files/files/2021.12.13_2020_pfas_tri_summary_report_complete_data.pdf.

75 Natural Resources Defense Council, New EPA Data: Huge Amounts of PFAS Underreported and Burned, 21 October 2021, archived at http://web.archive.org/web/20220427092359/https:// www.nrdc.org/experts/yiliqi/new-epa-data-huge-amounts-pfas-underreported-and-burned-0. 76 U.S. Rep. A. Donald McEachin et al., Letter to Dr. Michal Freedhoff, Assistant Administrator, Office of Chemical Safety and Pollution Prevention Re: Closing PFAS Reporting Loopholes under the Toxics Release Inventory, 11 April 2022, archived at https://web. archive.org/web/20220819133035/https://mceachin.house.gov/ sites/mceachin.house.gov/files/Letter%20to%20EPA%20on%20 PFAS%20Reporting%20Loopholes%20vF.pdf.

77 Joshua Bote, "Can you get cancer from tap water? New study says even 'safe' drinking water poses risk," USA *Today*, 19 September 2019, https://web.archive.org/web/20220819134524/ https://www.usatoday.com/story/news/health/2019/09/19/ your-tap-water-safe-study-claims-cancer-risk-even-safe-water/2350072001/.

78 See note 16.

79 Caitlin Shuda, "Wisconsin Rapids exploring redevelopment options for idled paper mill as Verso's new owners remain silent on its future," *Wisconsin Rapids Tribune*, 25 July 2022, archived at https://web.archive.org/ web/20220906220743/https://www.wisconsinrapidstribune. com/story/money/2022/07/25/wisconsin-rapids-paper-mill-billerudkorsnas-offers-no-updates-city-pursues-redevelopment-plans-verso/10105421002/.

80 For more on this, see letter from members of Congress here: https://mceachin.house.gov/sites/mceachin.house.gov/files/ Letter%20to%20EPA%20on%20PFAS%20Reporting%20Loopholes%20vF.pdf.

81 TRI release data is updated regularly even after the full year national dataset is released, because the EPA sometimes receives revised reports from facilities. The analysis in this report is based on TRI release data as downloaded on 3 May 2022 and does not include the updates that have been made since then – which are mostly minor – except where otherwise noted.

82 U.S. Environmental Protection Agency, *CompTox Dashboard*, available at https://comptox.epa.gov/dashboard/.

Bis(2-chloro-1-methylethyl)ether, technical grade" 83 assigned CAS number 108-60-1 as found 31 May 2022 at https:// iris.epa.gov/ChemicalLanding/&substance_nmbr=407#:~:text=Bis(2%2Dchloro%2D1,%7CIRIS%7CUS%20EPA%2C%20 ORD; "3,3'-Dimethoxybenzidine-based dyes metabolized to 3,3'-dimethoxybenzidine" assigned CAS number 119-90-4 as found 31 May 2022 at https://pubchem.ncbi.nlm.nih.gov/compound/3 3 -Dimethoxybenzidine#section=Other-Identifiers; "3,3'-Dimethylbenzidine-based dyes metabolized to 3,3'-dimethylbenzidine" assigned CAS number 119-93-7 as found 31 May 2022 at https://cameochemicals.noaa.gov/chemical/16097; "Dinitrotoluene (technical grade)" and "Dinitrotoluene mixture, 2,4-/2,6-" assigned CAS number 25321-14-6 as found 31 May 2022 at https://cameochemicals.noaa.gov/chemical/612; "Lindane and other hexachlorocyclohexane isomers" assigned CAS number 58-89-9 as found by searching TRI release data for lindane; "Pentachlorophenol and by-products of its synthesis (complex mixture)" assigned CAS number 87-86-5 as found by searching TRI release data for pentachlorophenol; "Perfluorononanoic acid (PFNA) and its salts" assigned CAS number 375-95-1 as found by searching TRI release data for perfluorononanoic acid; "Perfluorooctane sulfonic acid (PFOS) and its salts and transformation and degradation precursors" assigned CAS number 1763-23-1 as found by searching TRI release data for perfluorooctane sulfonic acid; "Polychlorinated biphenyls" and "Polychlorinated biphenyls (containing 60 or more percent chlorine by molecular weight) "assigned CAS number 1336-36-3 as found by searching TRI release data for polychlorinated biphenyls; "Quinoline and its strong acid salts" assigned CAS number 91-22-5 as found by searching TRI release data for guinoline.

84 U.S. Department of Agriculture, Natural Resources Conservation Service, *WBD_Annual_NRCS_OfficialSnapshot_ ForTheCurrentFiscalYear*, updated 14 September 2021, downloaded from https://nrcs.app.box.com/v/gateway/folder/39290322977, 19 May 2022. 85 Foley Cellulose LLC's total releases for 2020 were updated after the data used for the analysis in the main body of this report had been downloaded. As the only major facility with a significant change at the time of writing, the total 2020 release figure was updated in this table, but nowhere else. Updated release data: U.S. Environmental Protection Agency, *TRI Explorer: Releases: Facility Report*, accessed 22 August 2022 at https:// enviro.epa.gov/triexplorer/release_fac?p_view=STFA&fld=&trilib=TRIQ1&TAB_RPT=1&Fedcode=&LINESPP=&sort=E3&industry=ALL&FLD=E3&FLD=STOTHDIS&OTHDISP-D=Y&sort_fmt=2&TopN=&STATE=12&COUNTY=All+counties&chemical=All+chemicals&year=2020.

86 Foley Cellulose LLC's total releases for 2020 were updated after the data for this analysis had been downloaded, and the facility's total release value was updated in Table B-3. The updated value was for the facility's release of ammonia, which has an RSEI toxicity weighting of zero, and so does not affect the toxicity-weighted release for this facility.

87 Facilities with no listed parent company were assigned the facility name as the parent company in order to be able to compare the total releases of parent companies with multiple facilities to the total releases of single facilities where those single facilities discharge large amounts of toxic chemicals to waterways.

88 Ibid.

89 Toxicity weights for chromium and chromium compounds and for dioxin and dioxin-like compounds differ from the standard figures used by the EPA for these classes of substances because the EPA uses facility-specific factors in assigning toxicity weights to releases of these substances. The toxicity weights included here are implied weights based on the total toxicity-weighted releases divided by the pounds of those classes of substances released.