



1000 Vermont Avenue, NW  
Suite 1100  
Washington, D.C. 20005  
Main: 202-296-8800  
Fax: 202-296-8822  
environmentalintegrity.org

*Via certified mail and electronic mail*

May 2, 2024

Michael S. Regan, Administrator  
U.S. Environmental Protection Agency  
Office of the Administrator, Mail Code 1101A  
1200 Pennsylvania Avenue NW  
Washington, DC 20460  
[regan.michael@epa.gov](mailto:regan.michael@epa.gov)

Dear Administrator Regan:

Thank you for your statement on March 22 celebrating the importance of clean water to the United States and other countries around the world. The actions that President Biden and the U.S. Environmental Protection Agency (EPA) have taken to protect our waterways are significant and deserve public support. But while we enthusiastically support the Biden Administration's goal of advancing the Clean Water Act, we want to highlight three areas where more is needed to move us closer to clean, healthy waters for all Americans.

**1. Issue Overdue Water Quality Report**

More than fifty years ago, the Clean Water Act promised the American people that our rivers, lakes, and estuaries would be both "fishable and swimmable." To measure our progress in meeting these goals, Congress required the EPA to report on the condition of our streams, rivers, lakes, and estuaries at least once every two years, based on the agency's analysis of state reports that identify which waterways are clean enough for the public to enjoy and which remain so polluted they are unsafe for boating, swimming, and fishing (both commercial and recreational), or for use as a drinking water source. The EPA's last national water quality report summarizing all the state reports was released in 2017. EPA's failure to issue the required national reports since then is a clear violation of Section 305(b)(2) of the Clean Water Act.

Based on the monitoring results reported by states, about half of our rivers and lakes and at least a quarter of our estuaries remain so polluted they are unsuitable for fishing, swimming, or the other public uses the Clean Water Act was enacted to protect, while the condition of too many other waterways remains unmonitored. While state agencies issue their own water quality evaluations, their data can be difficult to interpret and inadequate to assess the condition of multi-state watersheds that cross so many state boundaries. There is no substitute for the kind of transparency that comes from a national report card issued by the EPA, which can be used to identify which waters ought to be a national priority for cleanup and to help identify pollution control strategies that work. While we appreciate the initiatives outlined in your March 22 statement, we respectfully request that EPA issue the national water quality report required by law as soon as possible.

## **2. Commit to Revising Outdated Technology-Based Pollution Limits**

The Clean Water Act also requires EPA to limit industrial discharges of toxins and certain other pollutants based on the best available pollution control technologies, and to make those regulatory standards more stringent as wastewater treatment methods improve. These national technology-based pollution limits are critical to cleaning up our nation's waters. While state agencies are supposed to impose technology-based limits on a case-by case basis where federal rules fall short, states rarely do so. In addition, many states have failed to establish all the water quality standards needed to protect uses like drinking water and aquatic life, and have failed to consistently put in place more stringent permit requirements to meet the water quality standards they have established, resulting in permits that do little to improve local water quality or restrict the discharge of pollutants that contribute to serious contamination further downstream.

In a 2019 opinion addressing national technology-based pollution limits, the U.S. Court of Appeals for the Fifth Circuit made clear that, "The Act therefore mandates a system in which, as available pollution control technologies advances, pollution discharge limits will tighten." The court then chastised the agency for taking so long to revise discharge limits for power plants that dated back to 1982, "...the same year that saw the release of the first CD player, the Sony Watchman pocket television, and the Commodore 64 home computer."

EPA has continued to ignore its statutory mandate and the Fifth Circuit's warning. As can be seen in the chart below this letter, the discharge limits for 40 of the 59 industries subject to these standards are between 30 and 50 years old, including those applying to Inorganic Chemicals (1984), Petroleum Refining (1985), Fertilizer Manufacturing (1986), and the makers of Organic Chemicals, Plastics, and Synthetic Fibers (1994). As a result, many chemical plants, refineries, and other industrial facilities continue to discharge high volumes of nitrogen, phosphorus, salts, and chemical toxins that contribute to algae growth, endanger fish and other aquatic life, or limit the public's use of river, lakes, and estuaries. Excepting the recently revised wastewater limits for coal-fired power plants, EPA has not completed action to bring the technology-based standards up to date for *any* industrial category for at least twenty years.

While EPA has finally proposed to update limits for slaughterhouses, the statute does not anticipate EPA promulgating national technology-based permit limits for only one or two industrial categories every ten or fifteen years. At the current pace, it may be a full century before EPA decides whether industrial discharge limits that date back to the 1970s and 1980s are "up to date." We hope that you will affirm the agency's commitment to reviewing and improving these discharge limits according to the Clean Water Act's mandate and timetable.

## **3. Identify the Funding Needed and Currently Used to Fulfill EPA's Clean Water Act Regulatory Responsibilities**

We understand that the EPA may lack the resources it needs to fulfill its statutory responsibilities. But the agency's annual budget proposal, including the detailed *Justification of Congressional Appropriations*, makes this shortfall invisible. At present, it is easy to identify the billions of dollars the agency proposes to spend (or has spent) every year on Clean Water Act grants to states, cities, universities, consortiums, partnerships, and other public and private organizations. But we cannot

identify the much smaller amounts reserved for the regulatory or deadline-driven tasks the law requires EPA to initiate and complete.

EPA's budget request should clearly identify the funding that it needs to discharge its statutory mandates within the deadlines established by the Clean Water Act. While some in Congress may see that as an opportunity to cut appropriations needed to implement the laws it has enacted, greater transparency would at least allow the public to debate and oppose such action. And the situation could hardly be worse than it is today, as budget cuts continue to fall harder on EPA's regulatory programs than on the grants or special initiatives earmarked by Congress.

Thank you for considering our views, and for all that EPA does to protect public health and the environment.

Eric Schaeffer  
Executive Director  
Meg Parish  
Senior Attorney  
**Environmental Integrity Project**  
[eschaeffer@environmentalintegrity.org](mailto:eschaeffer@environmentalintegrity.org)  
[mparish@environmentalintegrity.org](mailto:mparish@environmentalintegrity.org)

Kristen Schlemmer  
Senior Legal Director & Waterkeeper  
**Bayou City Waterkeeper**  
2010 N Loop W #103  
Houston, TX 77018  
[kristen@bayoucitywaterkeeper.org](mailto:kristen@bayoucitywaterkeeper.org)  
[www.bayoucitywaterkeeper.org](http://www.bayoucitywaterkeeper.org)

Mayor Nickole Nesby  
Environmental Justice Organizer  
**412 Justice**  
600 Penn Avenue  
Pittsburgh, PA 15221  
[Mayornesby@412justice.org](mailto:Mayornesby@412justice.org)  
<https://412justice.org/>

Charles Scribner  
Executive Director  
**Black Warrior Riverkeeper**  
712 37th Street South  
Birmingham, AL 35222  
[cscribner@blackwarriorriver.org](mailto:cscribner@blackwarriorriver.org)  
[www.BlackWarriorRiver.org](http://www.BlackWarriorRiver.org)

Trey Sherard  
Riverkeeper  
**Anacostia Riverkeeper**  
729 8th St SE  
Washington, DC 20003  
[trey@anacostiariverkeeper.org](mailto:trey@anacostiariverkeeper.org)  
[www.anacostiariverkeeper.org](http://www.anacostiariverkeeper.org)

Alice Volpitta  
**Baltimore Harbor Waterkeeper**  
Blue Water Baltimore  
1801 E. Oliver St.  
Baltimore, MD 21213  
[avolpitta@bluewaterbaltimore.org](mailto:avolpitta@bluewaterbaltimore.org)  
[www.BlueWaterBaltimore.org](http://www.BlueWaterBaltimore.org)

Dean Wilson  
Executive Director  
**Atchafalaya Basinkeeper**  
PO Box 410  
Plaquemine, LA 70765  
[enapay3@aol.com](mailto:enapay3@aol.com)

Kemp Burdette  
**Cape Fear Riverkeeper**  
Cape Fear River Watch  
617 Surry Street  
Wilmington, NC 28401  
[kemp@cfrw.us](mailto:kemp@cfrw.us)  
[www.CapeFearRiverWatch.org](http://www.CapeFearRiverWatch.org)

Beverly Graham  
**Citizens' Environmental Association of the  
Slippery Rock Area**  
40 Schmidt Rd  
Grove City, PA 16127  
[bevgraham49@gmail.com](mailto:bevgraham49@gmail.com)

Hannah Connor  
Environmental Health Deputy Director  
**Center for Biological Diversity**  
1411 K Street NW, Suite 1300  
Washington, DC 20005  
[hconnor@biologicaldiversity.org](mailto:hconnor@biologicaldiversity.org)  
[www.biologicaldiversity.org](http://www.biologicaldiversity.org)

Walkiria Pool  
President  
**Centro de Apoyo Familiar**  
6801 Kenilworth Ave Suite 110  
Riverdale, MD 20737  
[wpool@mycaf.org](mailto:wpool@mycaf.org)  
[www.mycaf.org](http://www.mycaf.org)

Evan Isaacson  
Senior Attorney  
**Chesapeake Legal Alliance**  
106 Ridgeley Ave  
Annapolis, MD 21403  
[evan@chesapeakelegal.org](mailto:evan@chesapeakelegal.org)

Michael Mullen  
Riverkeeper  
**Choctawhatchee** Riverkeeper  
207 Gail Street  
Troy, AL 36079  
[riverkeeper@troycable.net](mailto:riverkeeper@troycable.net)

Lynn Thorp  
National Campaigns Director  
**Clean Water Action**  
1444 I Street NW Suite 400  
Washington, DC 20005  
[lthorp@cleanwater.org](mailto:lthorp@cleanwater.org)  
[www.cleanwateraction.org](http://www.cleanwateraction.org)

Riley Lewis  
White Oak Waterkeeper  
**Coastal Carolina Riverwatch**  
4915 Arendell Street  
Suite J, PMB 223  
Morehead City, NC 28557  
[rileyl@coastalcarolinariverwatch.org](mailto:rileyl@coastalcarolinariverwatch.org)  
[www.coastalcarolinariverwatch.org](http://www.coastalcarolinariverwatch.org)

Celina Mahabir  
Federal Policy Advocate  
**Community Water Center**  
716 10th Street, Suite 300  
Sacramento, CA 95814  
[celina.mahabir@communitywatercenter.org](mailto:celina.mahabir@communitywatercenter.org)  
[www.communitywatercenter.org](http://www.communitywatercenter.org)

Rev. Dr. Kate R. Walker  
**First Unitarian Church of Pittsburgh**  
605 Morewood Avenue  
Pittsburgh, PA 15213  
[Minister@first-unitarian-pgh.org](mailto:Minister@first-unitarian-pgh.org)  
[www.first-unitarian-pgh.org](http://www.first-unitarian-pgh.org)

Julian Gonzalez  
Senior Legislative Counsel  
**Earthjustice**  
1001 G St. NW Suite 1000  
Washington, DC 20001  
[jgonzalez@earthjustice.org](mailto:jgonzalez@earthjustice.org)  
[www.earthjustice.org](http://www.earthjustice.org)

Michelle Montoya  
Policy Director  
**Environmental Protection Network**  
P.O. Box 42022  
Washington, DC 20015  
[michelle.montoya@environmentalprotectionnetwork.org](mailto:michelle.montoya@environmentalprotectionnetwork.org)  
[www.environmentalprotectionnetwork.org](http://www.environmentalprotectionnetwork.org)

Tarah Heinzen  
Legal Director  
**Food & Water Watch**  
1616 P St. NW, Suite 300  
Washington, DC 20036  
[theinzen@fwwatch.org](mailto:theinzen@fwwatch.org)  
[www.foodandwaterwatch.org](http://www.foodandwaterwatch.org)

Shannon Smith  
Executive Director  
**FracTracker Alliance**  
216 Franklin St, Suite 400  
Johnstown, PA 15901  
[smith@fractracker.org](mailto:smith@fractracker.org)  
[www.fractracker.org](http://www.fractracker.org)

Lea Harper  
Managing Director  
**FreshWater Accountability Project**  
PO Box 473  
Grand Rapids, OH 43522  
[wewantcleanwater@gmail.com](mailto:wewantcleanwater@gmail.com)  
[www.fwap.org](http://www.fwap.org)

Marian Dombroski  
**Friends of Quincy Run Watershed**  
6205 Lombard St  
Cheverly, MD 20785  
[mdombros@gmail.com](mailto:mdombros@gmail.com)  
[www.friendsofquincyrun.org](http://www.friendsofquincyrun.org)

Bryan Hofmann  
Deputy Director  
**Friends of the Rappahannock**  
3219 Fall Hill Ave  
Fredericksburg VA 22401  
[bryan.hofmann@riverfriends.org](mailto:bryan.hofmann@riverfriends.org)

Andrew Whitehurst  
Water Program Director  
**Healthy Gulf**  
3141 W. Tidewater Lane  
Madison, MS 39110  
[andrew@healthygulf.org](mailto:andrew@healthygulf.org)  
[www.healthygulf.org](http://www.healthygulf.org)

Michael Washburn  
Executive Director  
**Kentucky Waterways Alliance**  
330 N Hubbards Lane  
Louisville KY 40207  
[michael@kwalliance.org](mailto:michael@kwalliance.org)  
[www.kwalliance.org](http://www.kwalliance.org)

Sandy Bihn  
Executive Director  
**Lake Erie Waterkeeper**  
3900 N Summit St.  
Toledo, Ohio 43611  
[sandylakeerie@aol.com](mailto:sandylakeerie@aol.com)  
[www.lakeeriewaterkeeper.org](http://www.lakeeriewaterkeeper.org)

Ted Evgeniadis  
Riverkeeper  
**Lower Susquehanna Riverkeeper**  
2098 Long Level Rd  
Wrightsville, PA 17368  
[ted@lowsusriverkeeper.org](mailto:ted@lowsusriverkeeper.org)  
[www.lowsusriverkeeper.org](http://www.lowsusriverkeeper.org)

Cheryl Nenn  
Riverkeeper  
**Milwaukee Riverkeeper**  
600 E. Greenfield Ave  
Milwaukee WI 53204  
[cheryl\\_nenn@milwaukeeriverkeeper.org](mailto:cheryl_nenn@milwaukeeriverkeeper.org)  
[www.milwaukeeriverkeeper.org](http://www.milwaukeeriverkeeper.org)

Rachel Bartels  
Director  
**Missouri Confluence Waterkeeper**  
121 W Adams Ave  
Kirkwood, MO 63122  
[rachel@mowaterkeeper.org](mailto:rachel@mowaterkeeper.org)

David Caldwell  
Broad Riverkeeper  
**MountainTrue**  
540 Belwood Lawndale Rd.  
Lawndale, NC 28090  
[david@mountaintrue.org](mailto:david@mountaintrue.org)

Melissa Marshall  
Community Organizer  
**Mountain Watershed Association**  
1414-B Indian Creek Valley Rd.  
[melissa@mtwatershed.com](mailto:melissa@mtwatershed.com)  
<https://mtwatershed.com>

Rich Cogen  
Executive Director  
**Ohio River Foundation**  
4480 Classic Drive  
Blue Ash, OH 45241  
[rcogen@ohioriverfdn.org](mailto:rcogen@ohioriverfdn.org)

Frederick L Tutman  
Riverkeeper  
**Patuxent Riverkeeper**  
17412 Nottingham Road  
Upper Marlboro, MD 20772  
[fredt@paxriverkeeper.org](mailto:fredt@paxriverkeeper.org)  
[www.paxriverkeeper.org](http://www.paxriverkeeper.org)

Abigail M. Jones  
Vice President of Legal & Policy  
**PennFuture**  
610 N. Third St.  
Harrisburg, PA 17101  
[jones@pennfuture.org](mailto:jones@pennfuture.org)  
[www.pennfuture.org](http://www.pennfuture.org)

Katie Ruth  
Executive Director  
**Pennsylvania Interfaith Power & Light**  
321 W Chestnut St.  
Lancaster, PA 17603  
[director@paipl.org](mailto:director@paipl.org)  
<https://paipl.us>

Bob Dreher  
Legal Director  
**Potomac Riverkeeper Network**  
3070 M Street, NW  
Washington, DC 20007  
[bob@prknetwork.org](mailto:bob@prknetwork.org)  
<https://www.potomacriverkeepernetwork.org>

Jill Taylor  
**Protect Elizabeth Township**  
304 Mohawk Drive  
Buena Vista, PA 15018  
[Protectelizabethtownship@gmail.com](mailto:Protectelizabethtownship@gmail.com)

Gillian Graber  
Executive Director  
**Protect Penn-Trafford (PT)**  
3344 Rt. 130, Suite A  
Harrison City, PA 15636  
[gillian@protectpt.org](mailto:gillian@protectpt.org)  
[www.protectpt.org](http://www.protectpt.org)

Robert K. Musil, Ph.D., M.P.H.  
President & CEO  
**Rachel Carson Council**  
8600 Irvington Ave.  
Bethesda, Maryland  
[bmusil1@yahoo.com](mailto:bmusil1@yahoo.com)  
[www.rachelcarsoncouncil.org](http://www.rachelcarsoncouncil.org)

Bill Schultz  
Riverkeeper  
**Raritan Riverkeeper**  
P.O. Box 244  
Keasbey, NJ 08832  
[raritan.riverkeeper@verizon.net](mailto:raritan.riverkeeper@verizon.net)

April Ingle  
Advocacy Director  
**River Network**  
PO Box 21387  
Boulder, CO 80308  
[aingle@rivernetwork.org](mailto:aingle@rivernetwork.org)  
[www.rivernetwork.org](http://www.rivernetwork.org)

Diane Wilson  
Executive Director  
**San Antonio Bay Estuarine Waterkeeper**  
600 Ramona Rd.  
Seadrift, TX 77983  
[wilsonalamobay@aol.com](mailto:wilsonalamobay@aol.com)  
[www.sanantoniobaywaterkeeper.org](http://www.sanantoniobaywaterkeeper.org)

Matt Pluta  
Choptank Riverkeeper  
**ShoreRivers**  
114 South Washington St. Suite 301  
Easton, MD 21601  
[mpluta@shorerivers.org](mailto:mpluta@shorerivers.org)

Peter Morgan  
Senior Attorney  
**Sierra Club**  
2101 Webster St. Suite 1300  
Oakland, CA 94612  
[peter.morgan@sierraclub.org](mailto:peter.morgan@sierraclub.org)  
[www.sierraclub.org](http://www.sierraclub.org)

Buck Ryan  
Executive Director  
**Snake River Waterkeeper**  
2101 N. Harrison Blvd  
Boise, ID 83702-1238  
[buck@snakeriverwaterkeeper.org](mailto:buck@snakeriverwaterkeeper.org)

Abbey Tyrna  
Waterkeeper & Executive Director  
**Suncoast Waterkeeper**  
PO Box 1028  
Sarasota, FL 34230  
[executivedirector@suncoastwaterkeeper.org](mailto:executivedirector@suncoastwaterkeeper.org)  
[www.suncoastwaterkeeper.org](http://www.suncoastwaterkeeper.org)

Staley Prom  
Senior Legal Associate  
**Surfrider Foundation**  
PO Box 73550  
San Clemente CA 92673  
[sprom@surfrider.org](mailto:sprom@surfrider.org)  
[www.surfrider.org](http://www.surfrider.org)  
Arietta Ann DuPre

Executive Director of Operations  
Sweet Springs Resort Park Foundation Inc.  
19540 Sweet Springs Valley Road  
Gap Mills, WV 24941  
[sweetspringsassistant@gmail.com](mailto:sweetspringsassistant@gmail.com)  
[www.sweetspringsresortpark.org](http://www.sweetspringsresortpark.org)

Ashby Berkley and Arietta DuPre  
President - Executive Director of Operations  
**Sweet Springs Watershed Association**  
19540 Sweet Springs Valley Road  
Gap Mills, WV 24941  
[sswatershed@gmail.com](mailto:sswatershed@gmail.com)

Rebecca Malpass  
Director of Policy & Research  
**The Water Collaborative of Greater New Orleans**  
1433 N. Claiborne Ave, Suite 201  
New Orleans, LA 70116  
[rebecca@nolawater.org](mailto:rebecca@nolawater.org)  
[www.nolawater.org](http://www.nolawater.org)

Heather Hulton VanTassel  
Executive Director  
**Three Rivers Waterkeeper**  
800 Vinial St Suite B314  
Pittsburgh, PA 15212  
[heather@threeriverswaterkeeper.org](mailto:heather@threeriverswaterkeeper.org)  
[www.3RWK.org](http://www.3RWK.org)

Eve Goldman  
Advocacy & Policy Director / Riverkeeper  
**Tualatin Riverkeeper**  
11675 SW Hazelbrook Rd.  
Tualatin, OR 97062  
[eve@tualatinriverkeepers.org](mailto:eve@tualatinriverkeepers.org)  
<https://tualatinriverkeepers.org>

Pamela Digel  
**Upper Allegheny Riverkeeper**  
25 Bon Air Ave.  
Bradford, PA 16701  
[pasmartin23@gmail.com](mailto:pasmartin23@gmail.com)

Guy Alsentzer  
Executive Director  
**Upper Missouri Waterkeeper**  
24 S. Willson Ave, Suite 6-7  
Bozeman MT 59715  
[guy@UpperMissouriWaterkeeper.org](mailto:guy@UpperMissouriWaterkeeper.org)  
[www.UpperMissouriWaterkeeper.org](http://www.UpperMissouriWaterkeeper.org)

Kelly Hunter Foster  
Senior Attorney  
**Waterkeeper Alliance**  
180 Maiden Lane, Suite 603  
New York, NY 10038  
[kfoster@waterkeeper.org](mailto:kfoster@waterkeeper.org)  
<https://waterkeeper.org>

Robin Broder  
Deputy Director  
**Waterkeepers Chesapeake**  
962 Wayne Ave, Ste 610  
Silver Spring, MD 20910  
[robin@waterkeeperschesapeake.org](mailto:robin@waterkeeperschesapeake.org)  
[www.waterkeeperschesapeake.org](http://www.waterkeeperschesapeake.org)

Debra Buffkin  
Executive Director  
**Winyah Rivers Alliance**  
P.O. Box 554  
Conway, SC 29528  
[executivedirector@winyahrivers.org](mailto:executivedirector@winyahrivers.org)

[www.winyahrivers.org](http://www.winyahrivers.org)

Chavaysha Chaney  
Manger of Advocacy and Health Policy  
**Women for a Healthy Environment**  
7371 Thomas Blvd  
Pittsburgh, PA 15208  
[chavaysha@womenforahealthyenvironment.org](mailto:chavaysha@womenforahealthyenvironment.org)

Lisa Riley  
**Yough Communities Care**  
718 Miller Avenue  
Sutersville, PA 15083  
[kresovich@gmail.com](mailto:kresovich@gmail.com)



## Age of All Federal Technology-Based Pollution Limits (ELGs)

ELG (Industrial Category)	40 CFR Citation	Year of Promulgation	Year of Last Revision	Years Since Revision
Rubber Manufacturing	428	1974	Never Revised	50
Asbestos Manufacturing	427	1974	1975	49
Canned and Preserved Seafood (Seafood Processing)	408	1974	1975	49
Dairy Products Processing	405	1974	1975	49
Ferroalloy Manufacturing	424	1974	1975	49
Ink Formulating	447	1975	Never Revised	49
Paint Formulating	446	1975	Never Revised	49
Paving and Roofing Materials (Tars and Asphalt)	443	1975	Never Revised	49
Soap and Detergent Manufacturing	417	1974	1975	49
Canned and Preserved Fruits and Vegetable Processing	407	1974	1976	48
Explosives Manufacturing	457	1976	Never Revised	48
Gum and Wood Chemicals	454	1976	Never Revised	48
Hospitals	460	1976	Never Revised	48
Photographic Processing	459	1976	Never Revised	48
Cement Manufacturing	411	1974	1977	47
Carbon Black Manufacturing	458	1976	1978	46
Mineral Mining and Processing	436	1975	1979	45
Timber Products Processing	429	1974	1981	43
Textile Mills	410	1974	1982	42
Coil Coating	465	1982	1983	41
Electrical and Electronic Components	469	1983	Never Revised	41
Electroplating	413	1974	1983	41
Inorganic Chemicals	415	1974	1984	40
Plastics Molding and Forming	463	1984	Never Revised	40
Metal Molding and Casting (Foundries)	464	1985	Never Revised	39

<b>ELG (Industrial Category)</b>	<b>40 CFR Citation</b>	<b>Year of Promulgation</b>	<b>Year of Last Revision</b>	<b>Years Since Revision</b>
<b>Petroleum Refining</b>	419	1974	1985	39
<b>Porcelain Enameling</b>	466	1982	1985	39
<b>Battery Manufacturing</b>	461	1984	1986	38
<b>Copper Forming</b>	468	1983	1986	38
<b>Fertilizer Manufacturing</b>	418	1974	1986	38
<b>Glass Manufacturing</b>	426	1974	1986	38
<b>Grain Mills</b>	406	1974	1986	38
<b>Metal Finishing</b>	433	1983	1986	38
<b>Phosphate Manufacturing</b>	422	1974	1986	38
<b>Sugar Processing</b>	409	1974	1986	38
<b>Aluminum Forming</b>	467	1983	1988	36
<b>Ore Mining and Dressing (Hard Rock Mining)</b>	440	1975	1988	36
<b>Nonferrous Metals Forming and Metal Powders</b>	471	1985	1989	35
<b>Nonferrous Metals Manufacturing</b>	421	1976	1990	34
<b>Organic Chemicals, Plastics, and Synthetic Fibers (OCPSF)</b>	414	1987	1993	31
<b>Leather Tanning and Finishing</b>	425	1982	1996	28
<b>Pesticide Chemicals</b>	455	1978	1998	26
<b>Centralized Waste Treatment</b>	437	2000	Never Revised	24
<b>Landfills</b>	445	2000	Never Revised	24
<b>Transportation Equipment Cleaning</b>	442	2000	Never Revised	24
<b>Waste Combustors</b>	444	2000	Never Revised	24
<b>Coal Mining</b>	434	1975	2002	22
<b>Metal Products and Machinery</b>	438	2003	Never Revised	21
<b>Pharmaceutical Manufacturing</b>	439	1976	2003	21
<b>Concentrated Aquatic Animal Production</b>	451	2004	Never Revised	20
<b>Concentrated Aquatic Animal Production (Aquaculture)</b>	451	2004	Never Revised	20

<b>ELG (Industrial Category)</b>	<b>40 CFR Citation</b>	<b>Year of Promulgation</b>	<b>Year of Last Revision</b>	<b>Years Since Revision</b>
<b>Iron and Steel Manufacturing</b>	420	1974	2005	19
<b>Pulp, Paper, and Paperboard</b>	430	1974	2007	17
<b>Airport Deicing</b>	449	2012	Never Revised	12
<b>Construction and Development</b>	450	2009	2014	10
<b>Oil and Gas Extraction</b>	435	1975	2016	8
<b>Dental Office</b>	441	2017	Never Revised	7
<b>Meat and Poultry Products*</b>	432	1974	2004	N/A
<b>Steam Electric Power Generating</b>	423	1974	2024	0

\* Consent decree requires promulgation of MPP revisions by summer 2025.