

49. The Alliance maintains four core programs: Toxics Reduction, Environmental Justice, Government Accountability, and Compliance-Enforcement. Under its Toxics Reduction Program, the Alliance states that “[w]here measured or allowable toxic pollutant concentrations exceed levels necessary to protect human health or other creatures, the Alliance will seek to identify the sources and take action to reduce the measured or allowable toxic pollutants. These actions might include enforcement actions if a source is out of compliance or petitions for rulemaking to reduce the allowable discharge or emission of toxic pollutants.”

50. The Alliance is funded entirely from donations. Its limited funds are used primarily to pay minimal administrative and marketing expenses and to reimburse personnel and volunteer contractors for out-of-pocket expenses incurred on behalf of the Alliance. Although the Alliance maintains a Toxics Reduction program, it has no dedicated funding for the Program.

51. In direct response to the Environmental Protection Agency’s January 21, 2025 withdrawal of the draft final new and revised numerical water quality criteria for priority toxic pollutants to protect human health and the designated uses of Florida’s Class II, III and III-Limited waters