

water criteria for such pollutants in *Water Quality Standards to Protect Human Health in Florida – Proposed Rule*, 88 Fed. Reg. 85530 (Dec. 8, 2023) as required by Clean Water Act § 303(c)(4), 33 U.S.C. § 1313(c)(4);

B. That the Court enter a declaratory judgment holding that the Administrator of the Environmental Protection Agency has unlawfully withheld agency action under the Administrative Procedure Act, to wit: the promulgation of new and revised numerical water quality criteria for 73 priority toxic pollutants in Florida’s Class II, III and III-Limited waters not later than 90 days after the publication of proposed new or revised water criteria for such pollutants in *Water Quality Standards to Protect Human Health in Florida – Proposed Rule*, 88 Fed. Reg. 85530 (Dec. 8, 2023) as required by Clean Water Act § 303(c)(4), 33 U.S.C. § 1313(c)(4);

C. That the Court issue a permanent injunction ordering the Administrator of the Environmental Protection Agency to immediately promulgate regulations establishing new and revised numerical water quality criteria for 73 priority toxic pollutants in Florida’s Class II, III and III-Limited waters;

D. That the Court award Plaintiffs costs of litigation (including reasonable attorney and expert witness fees) pursuant to Clean Water Act