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WASHINGTON, DC

# Differential Impact of Pollution Prevention and Green Chemistry Activities on Marginalized Communities

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Trip Johnson

Outside Data

Industry Data

Census Data

Collection & Processing

United States  
Environmental  
Protection  
Agency  
(US EPA)

Relevant Data

Toxics Release  
Inventory

Green  
Chemistry  
Codes, Release  
Toxicity

EJ Screening  
and Mapping  
Tool  
(EJScreen)

Location-Based  
Demographic  
Information

Analysis

Risk Analysis

Results

Green  
Chemistry  
Distribution

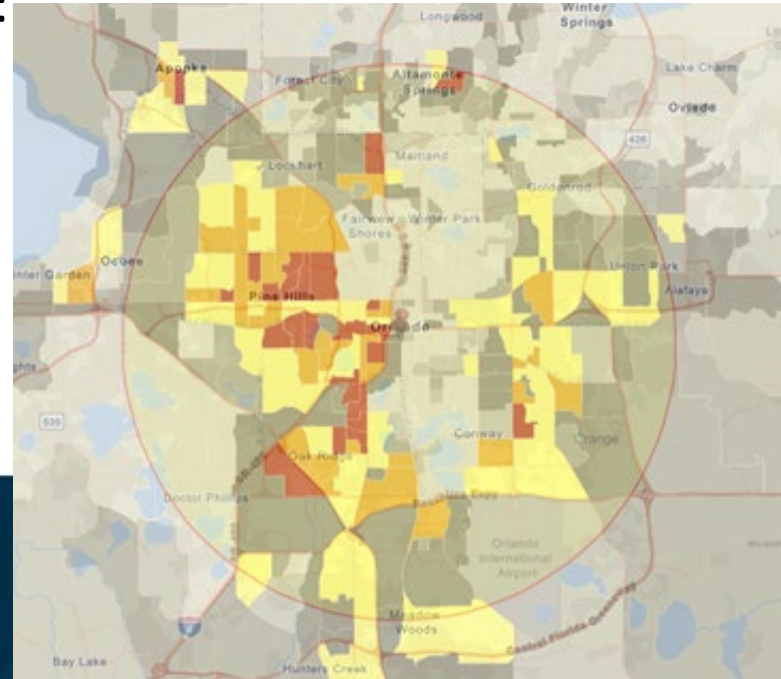
Toxic Chemical  
Analysis

Risk Outcomes

Barriers

# Demographic Index & Divisions

- Index based on the average of two demographic indicators:
  - Minority
  - Low-Income
- Analysis at 3 different demographic divisions:
  - Similar population groups
    - Census Block Group - Average 9.4 square mi
    - Census Tract - Average 26.4 square mi
  - Area Groups
    - 10 Mile Radius - 314 square mi



# Not at Risk vs At Risk

- EJSCREEN User Manual defines marginalized communities as having a demographic index above the 80th percentile
- Meaning, above 57.51% Demographic Index is an At Risk community

National Percentiles for Demographic Index	
National Percentiles	Percentages
95 - 100 percentile	$\geq 80.01$
90 - 95 percentile	$< 80.01$
80 - 90 percentile	$< 71.54$
70 - 80 percentile	$< 57.51$
60 - 70 percentile	$< 45.72$
50 - 60 percentile	$< 36.35$
Less than 50 percentile	$< 29.26$

# Scope

- EPA Region 4
  - 3rd greatest toxic releasing region
  - Multiple areas with high minority populations
  - Prominence of the chemical industry
- North American Industry Classification System (NAICS) Codes
  - Chemical Industry (325)
  - Subsectors of chemical industry
- Air and Water Releases
  - Land releases excluded



(EPA, 2022)

Demographic  
Distribution of  
Implementation

Effects on Toxic  
Releases

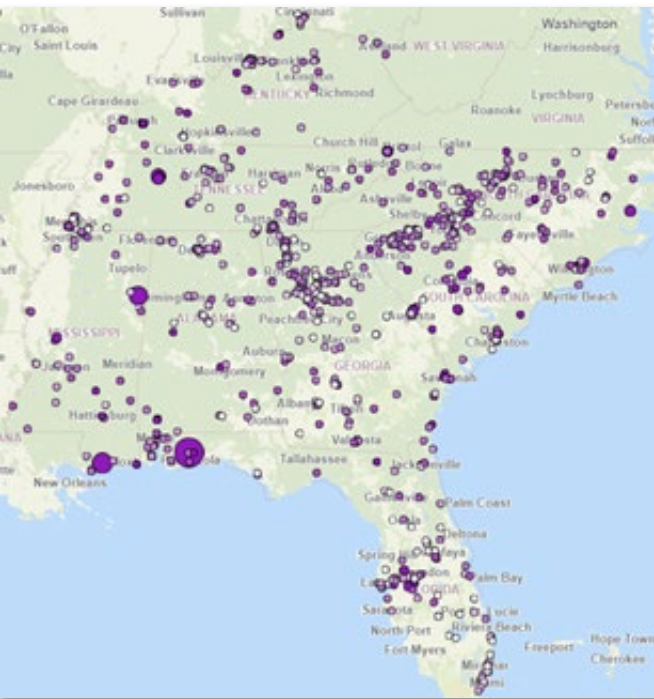


Effects on Risk  
Scores (RSEI)

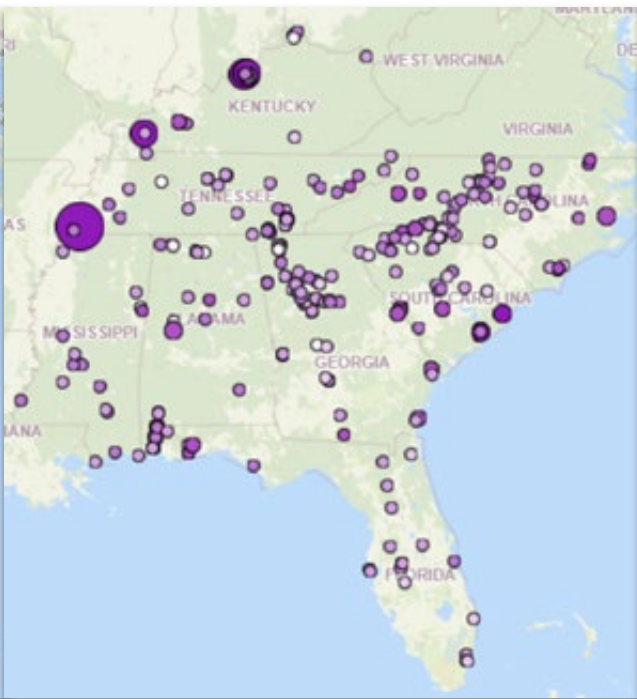
Barriers to  
Implementation

**Green Chemistry and  
Pollution Prevention  
Methods:  
Analysis Divisions**

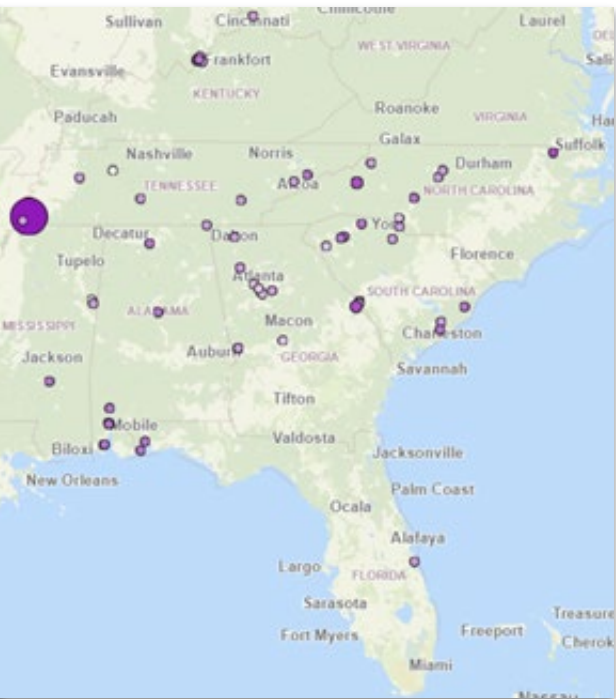
# Green Chemistry/Pollution Prevention Implementation



All facilities with release reports



Facilities with P2 activities

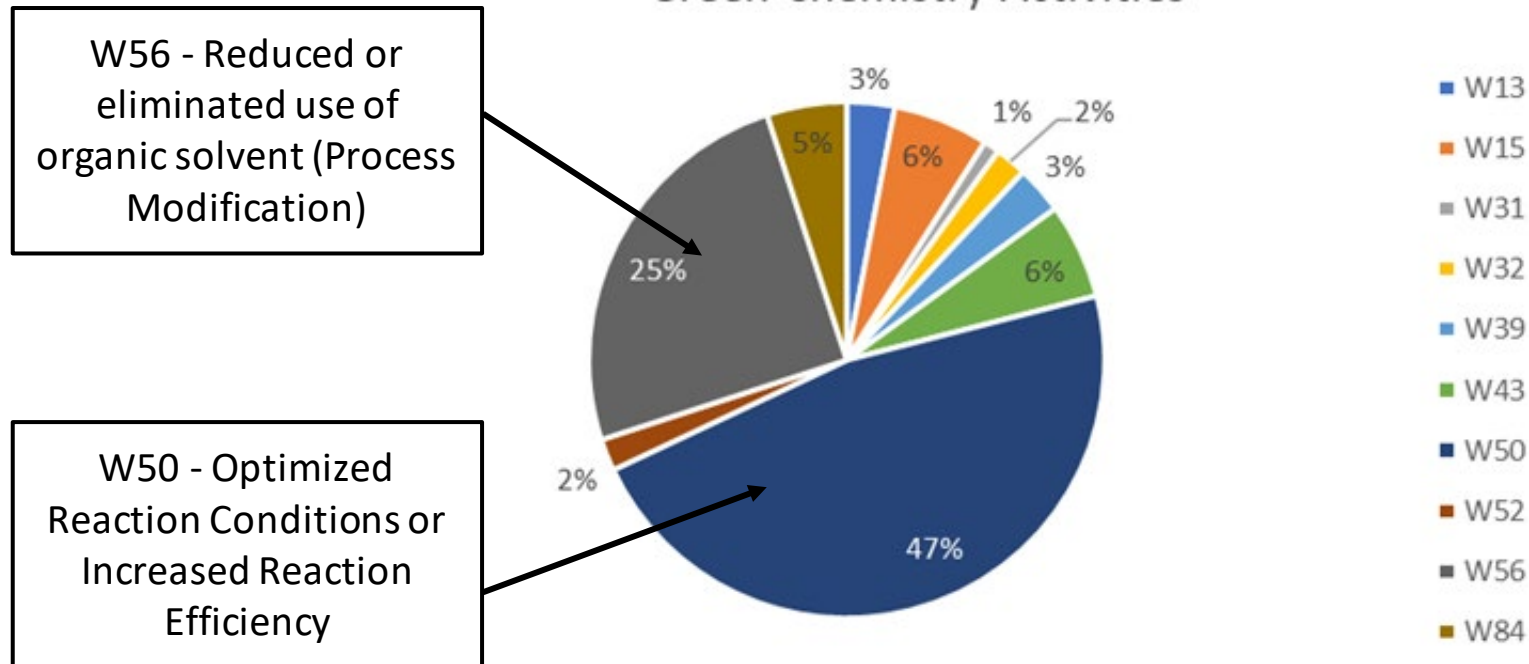


Facilities with GC activities

(TRI Toxics Tracker, 2022)

# Green Chemistry Implementation by W-Code

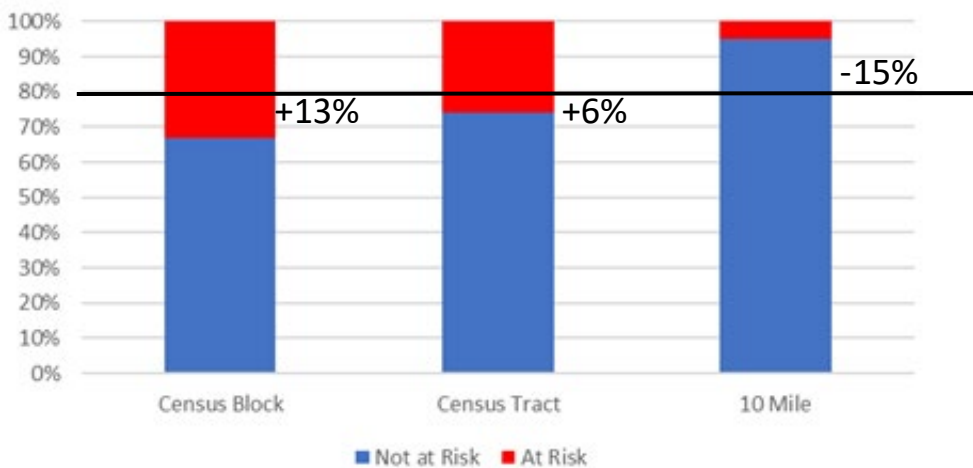
## Green Chemistry Activities





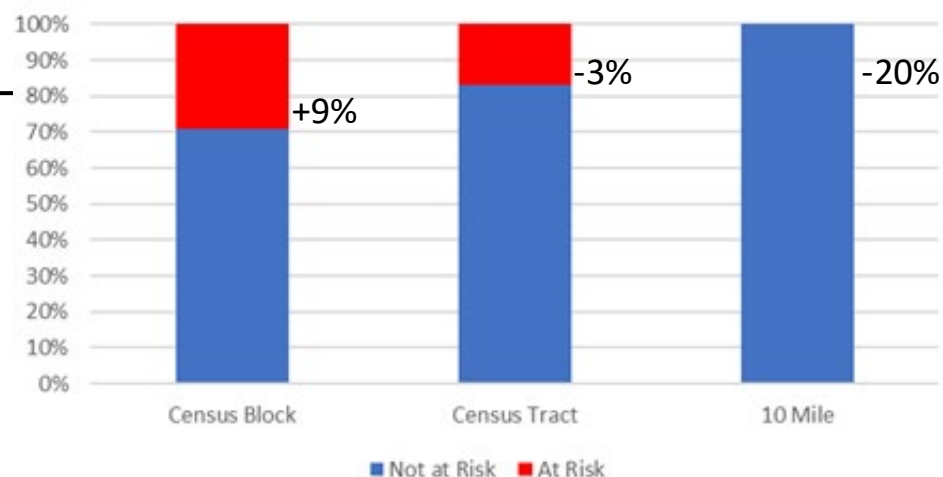
# Demographic Distribution of Facilities

## Source Reduction Activities



**172 Facilities total**

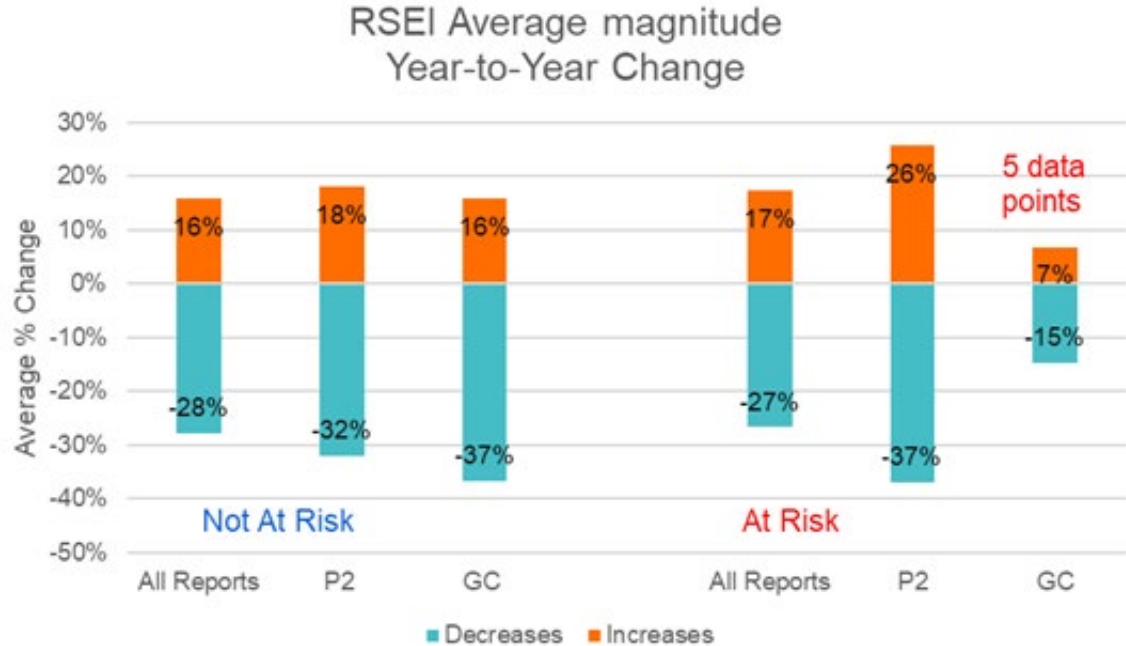
## Green Chemistry Activities



**24 Facilities total**

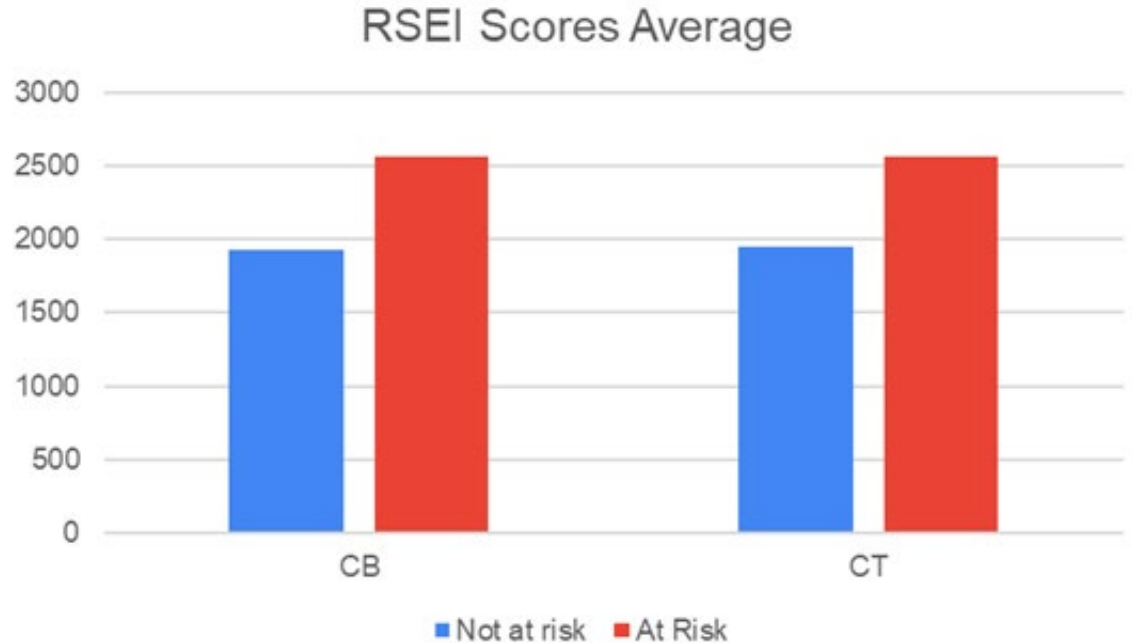
# Outcomes: Year-to-Year changes

- With P2 and GC activities have greater reductions of RSEI scores.
- GC in at risk communities has a much smaller impact.



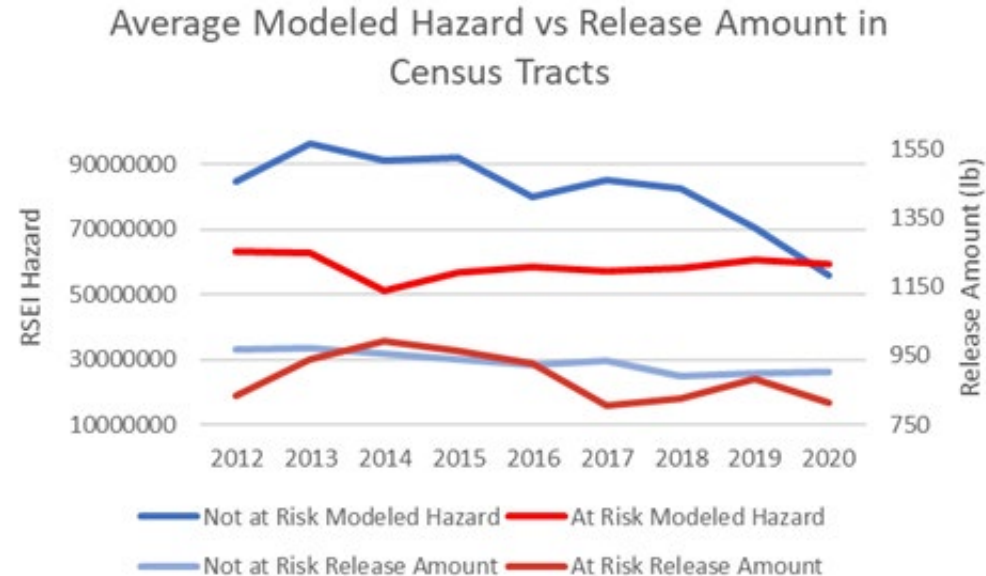
# Average RSEI Score

- At risk communities have a higher per report RSEI score
- RSEI score includes affected population



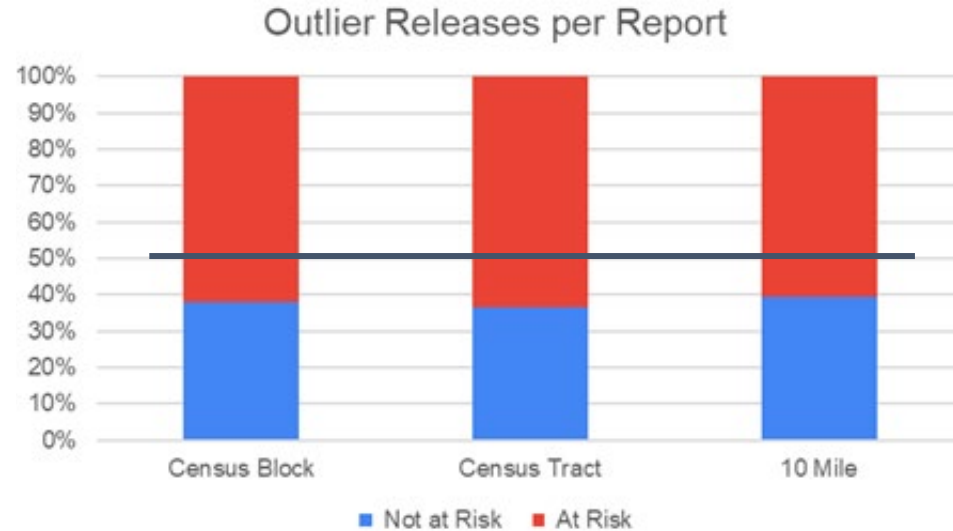
# Modeled Hazard vs Release Amount

- Average Modeled Hazard decreases across Not at Risk communities
- Average Release Amount stays constant in both Not at Risk and At Risk communities



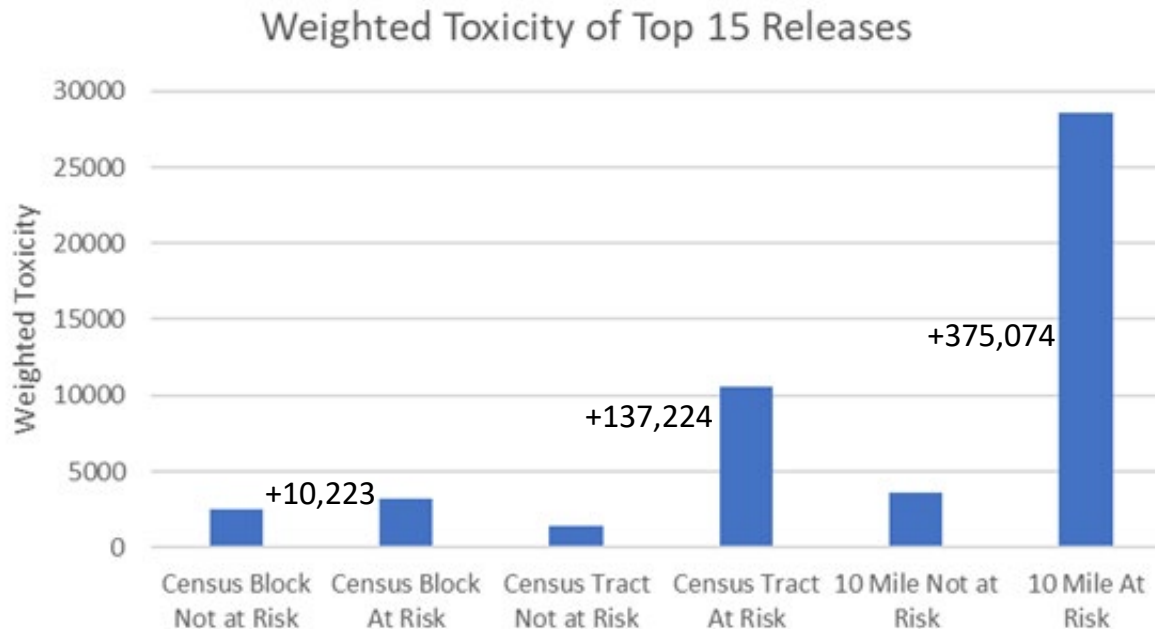
# Outliers - Toxic Releases

- Outliers report releases greater than 7,171 pounds
- Average releases were greater in At Risk communities than Not at Risk Communities



# Weighted Toxicity

- Weighted Toxicity removes influence of release amount
- Top releases in At Risk communities release more toxic chemicals



# Barriers (B) to Pollution Prevention (P2)

B1 - Insufficient capital to install new source reduction equipment or implement new source reduction activities/initiatives

B2 - Require technical information on pollution prevention techniques applicable to specific production processes

B3 - Concern that product quality may decline as a result of source reduction

B4 - Source reduction activities were implemented but were unsuccessful

B5 - Specific regulatory/permit burdens

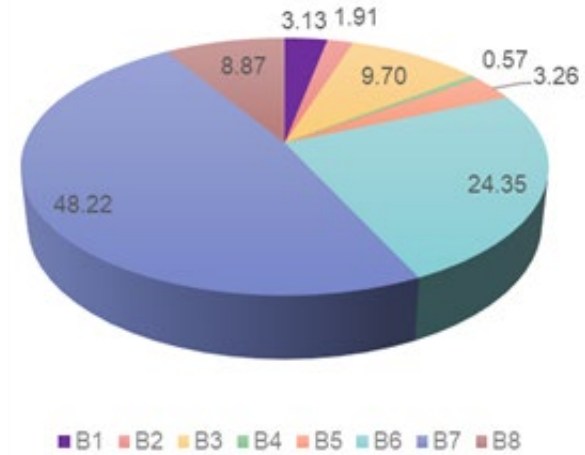
B6 - Pollution prevention previously implemented; additional reduction does not appear technically or economically feasible

B7 - No known substitutes or alternative technologies

B8 - Reduction does not appear to be technically feasible

B99 - Other Barriers

% of Reporting (2014-2020)



## Cost/Regulatory

B1 - **Insufficient capital** to install new source reduction equipment or implement new source reduction activities/initiatives

B5 - Specific **regulatory/permit burdens**

B6 - Pollution prevention previously implemented; **additional reduction does not appear technically or economically feasible**

## Lack of Knowledge/Technical Ingenuity

B2 - **Require technical information** on pollution prevention techniques applicable to specific production processes

B3 - Concern that **product quality may decline** as a result of source reduction

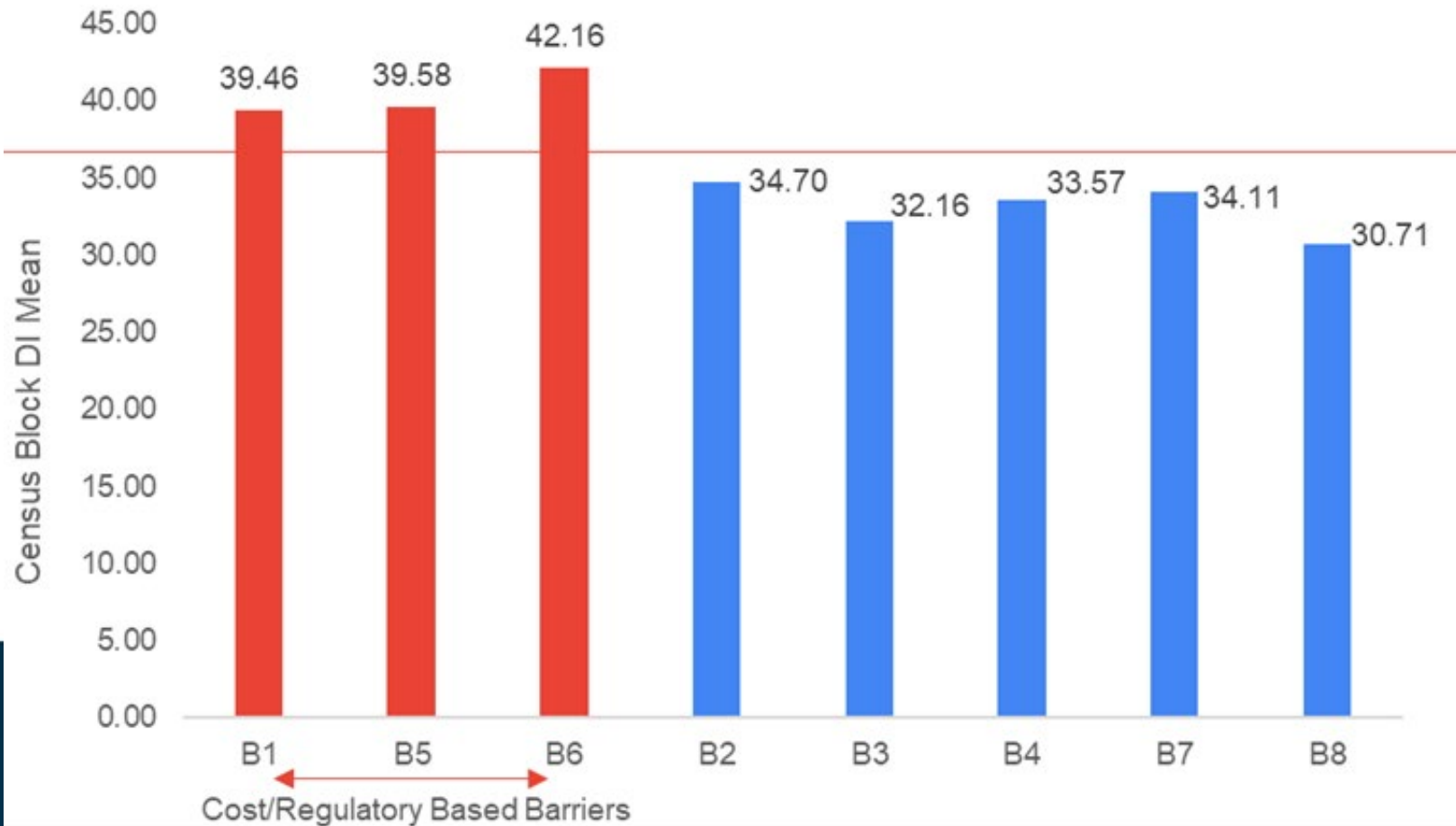
B4 - **Source reduction** activities were implemented but were **unsuccessful**

B7 - **No known substitutes** or alternative technologies

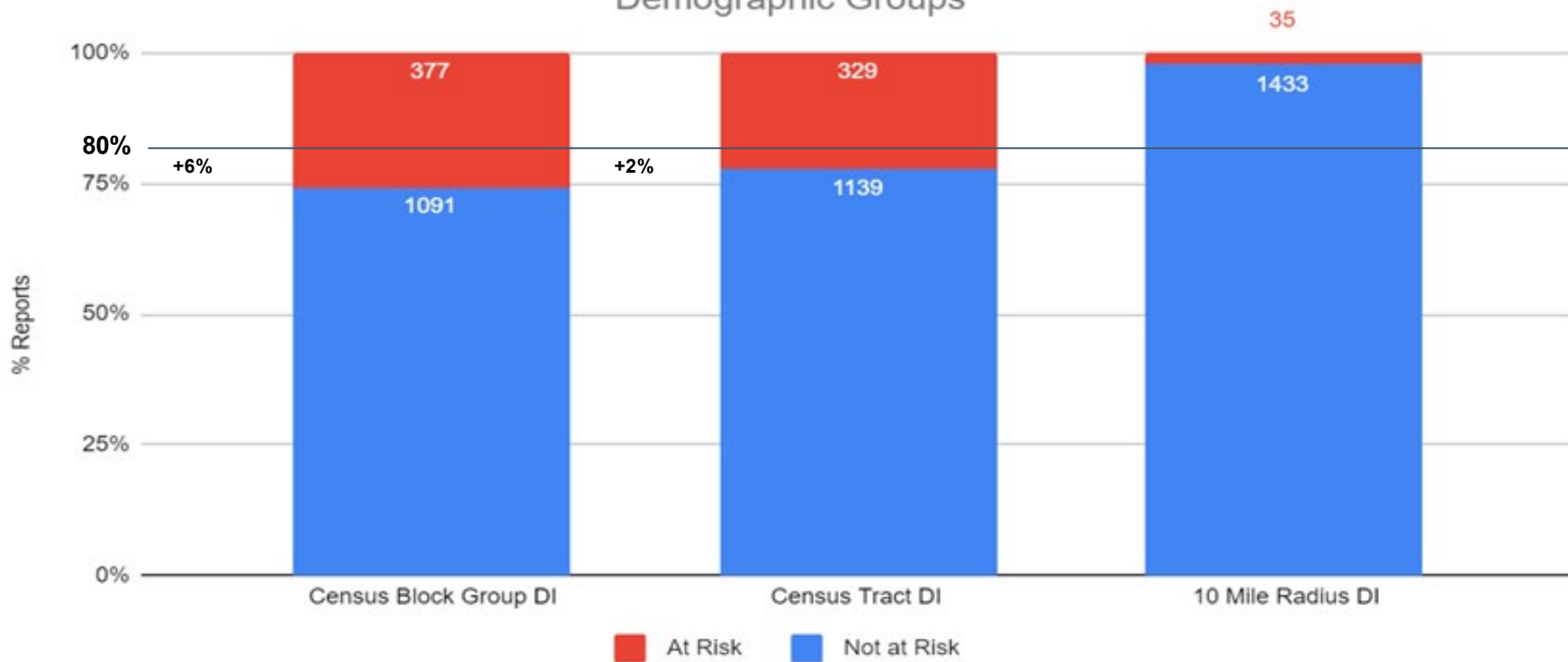
B8 - Reduction does not appear to be **technically feasible**



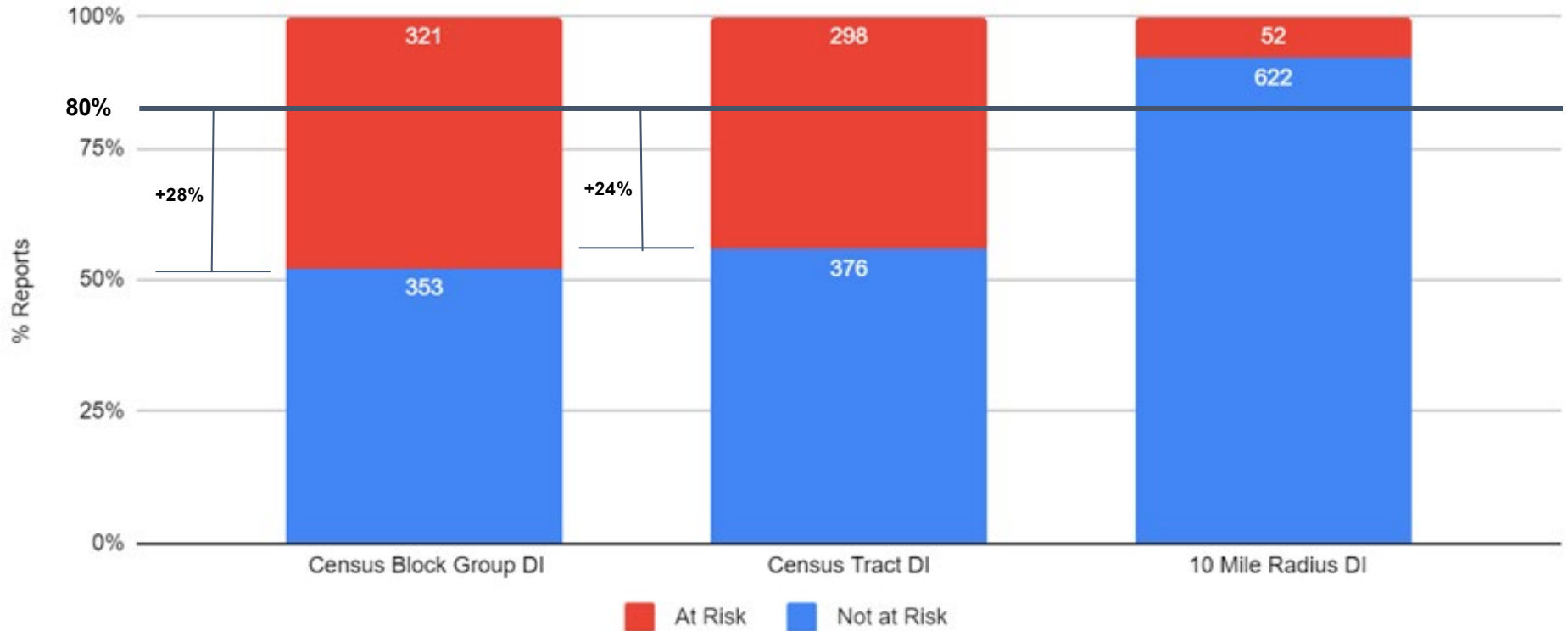
## Reported Barrier Demographic Index Averages



# Lack of Knowledge/Technical Ingenuity Based Barriers Reporting Frequency for At Risk Demographic Groups



# Cost/Regulatory Based Barriers Reporting Frequency for At Risk Demographic Groups



# Region 4

Green  
Chemistry  
reporting is  
equitable

Outliers release  
toxic chemicals  
inequitably

Green Chemistry  
minimally  
impacts RSEI  
Scores

Cost/Regulatory  
barriers occur  
more in At Risk  
communities

Green  
Chemistry is  
inequitably  
implemented

# Limitations

## With TRI data:

- Releases are related to productivity.
- Accidents and unexpected events.
- Green chemistry practices reported are not widespread.

## With Demographic data:

- Census Blocks and Tracts are irregular.
- Nearby populations can be excluded due to block boundaries.
- At Risk grouping only considers the two dimensions.

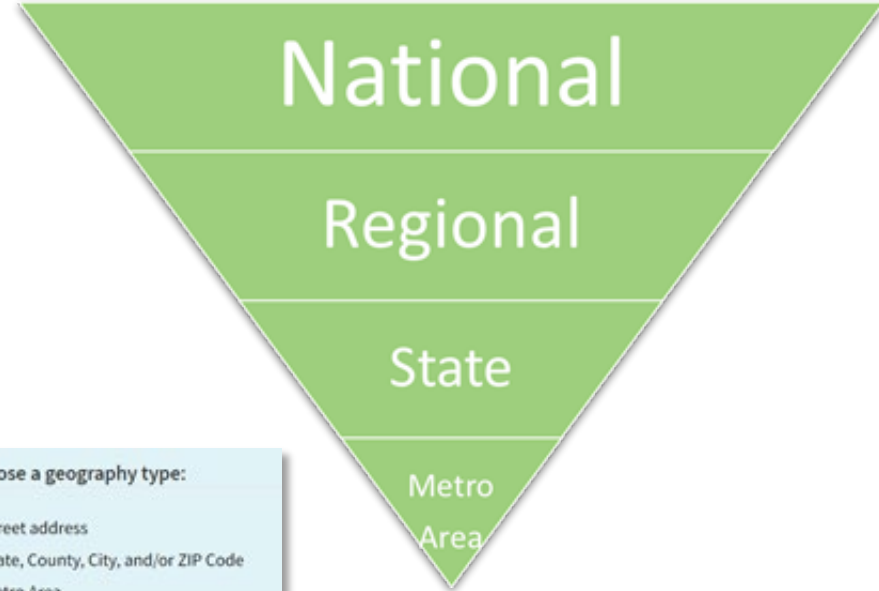
# Expanded Applications of the Method

## Reproducible

- Individual Companies
- Subsectors
- Chemical Specific
- Other Nations

## Scalable

- TRI geography filters



### Choose a geography type:

- Street address
- State, County, City, and/or ZIP Code
- Metro Area
- Watershed
- Tribal Land
- EPA Region

(TRI Toxics Tracker 2022)

# Acknowledgements and Closing Remarks

- Capstone Advisor
  - Dr. Jakub Kostal
- EPA Panel of Advisors
  - Charlie Snyder
  - Sandra Ganoa
  - Steve DeVito
- External Partners
  - Adrian Horotan, Safer Made
  - Dr. David Constable, American Chemical Society
  - Dr. Hans Plugge, Safer Chemical Analytics LLC
  - Dr. Joel Tickner, University of Massachusetts Lowell Center for Sustainable Production
  - Dr. Lauren Heine, ChemForward

“Injustice anywhere is a threat to justice everywhere.”

- Dr. Martin Luther King

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# References

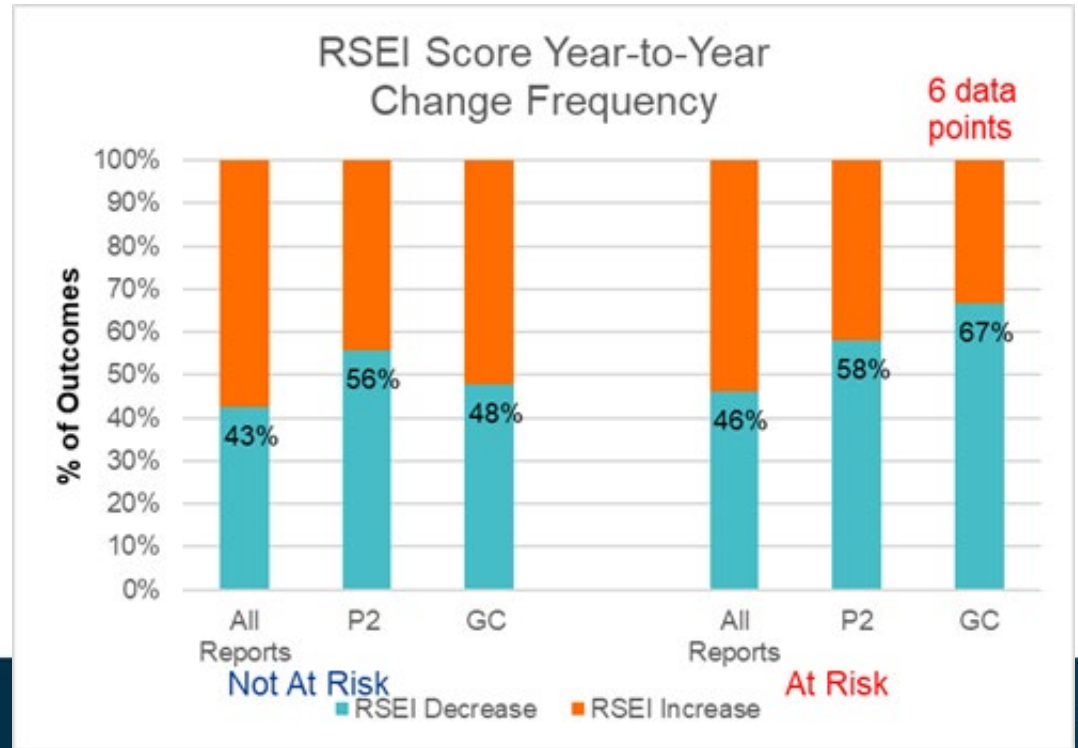
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# Backup Slides



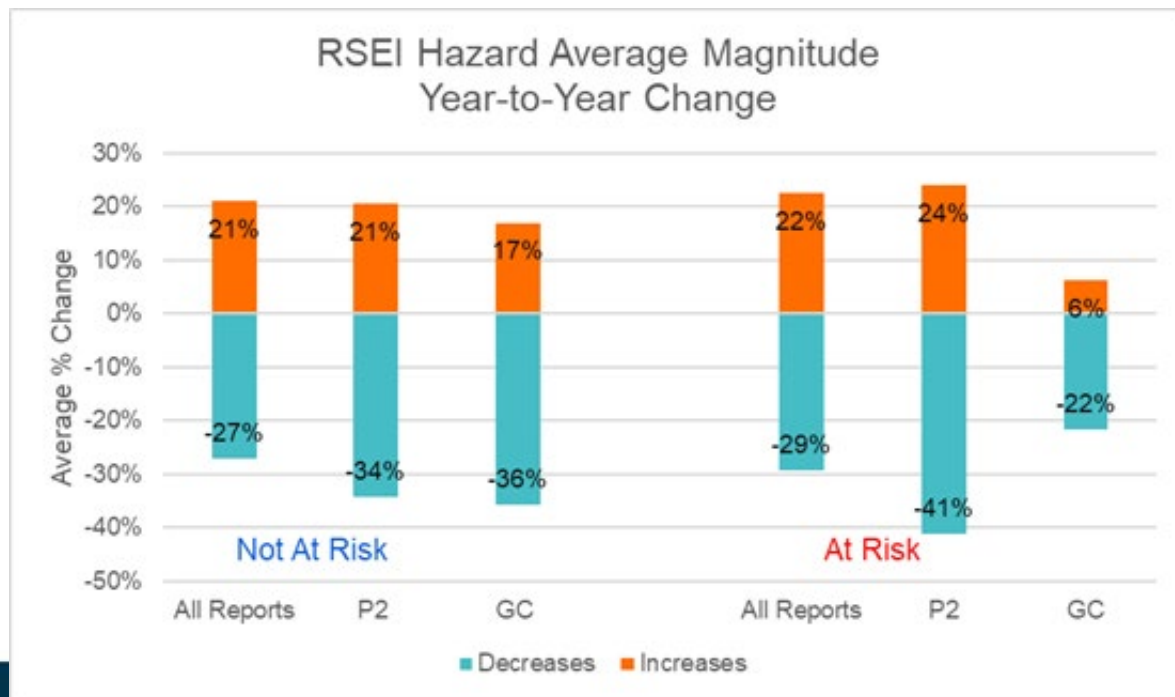
# Outcomes: Frequency

- There is a greater frequency of Chemicals increasing in RSEI score.
- P2 and GC activities improve the occurrence of decreasing RSEI score.

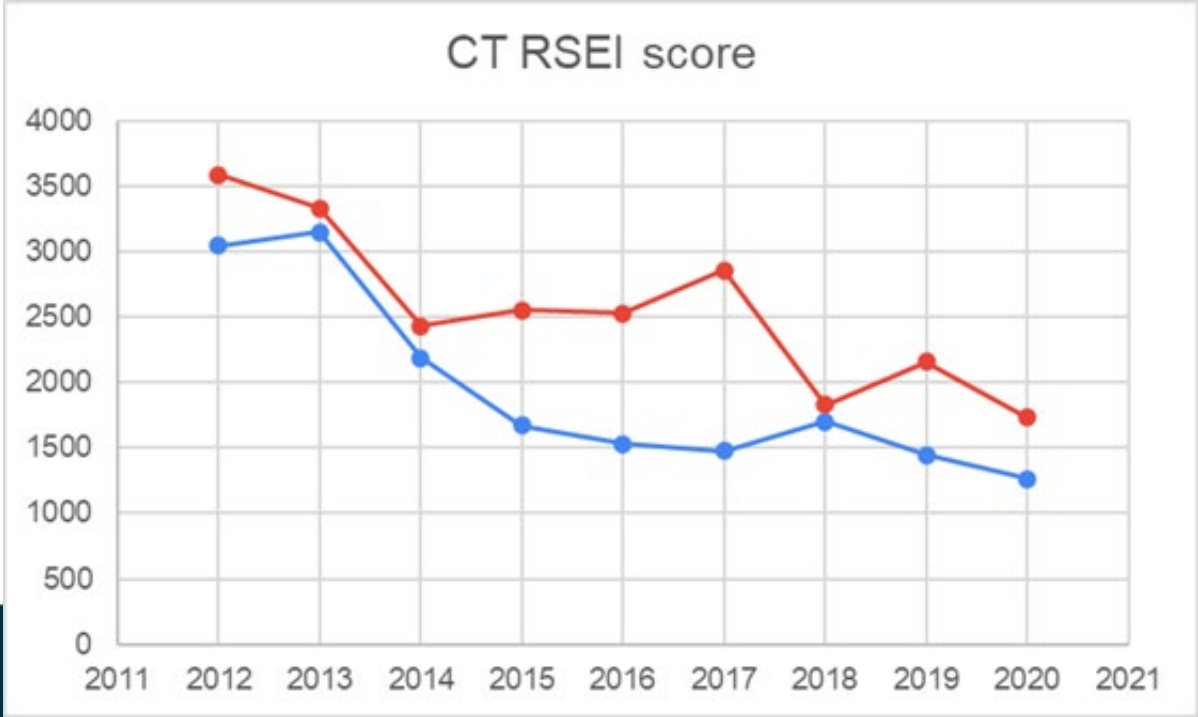


# Outcomes: Year-to-Year changes (Hazard)

- With P2 and GC activities have greater reductions of RSEI scores.
- GC in at risk communities has a much smaller impact.

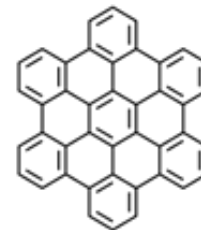
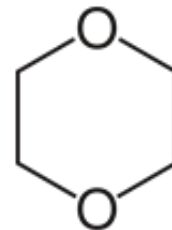


# RSEI score trends



# Chemicals

- Weighted Toxicity difference of top releasers
  - Average WT Not at Risk: 2,292.7
  - Average WT At Risk: 16,351.9
- Weighted Toxicity = RSEI Hazard Score ÷ Pounds of Toxic Releases
  - Removes the influence of release amounts per report



	Dioxane	Polycyclic Aromatic Compounds
Not at Risk or At Risk communities?	Not at Risk	At Risk
RSEI Hazard	129,420,000	2,748,993,000
Weighted Toxicity	18,000	390,000

# Toxic Release Inventory (TRI)

- Section 313 of Emergency Planning and Community Right to Know Act (EPCRA)
- Mandatory reporting of chemical releases
- Tracks industry progress in waste reduction
- Report source reduction activities
- Voluntarily report barriers to pollution prevention

## Green Chemistry-Specific W-Codes

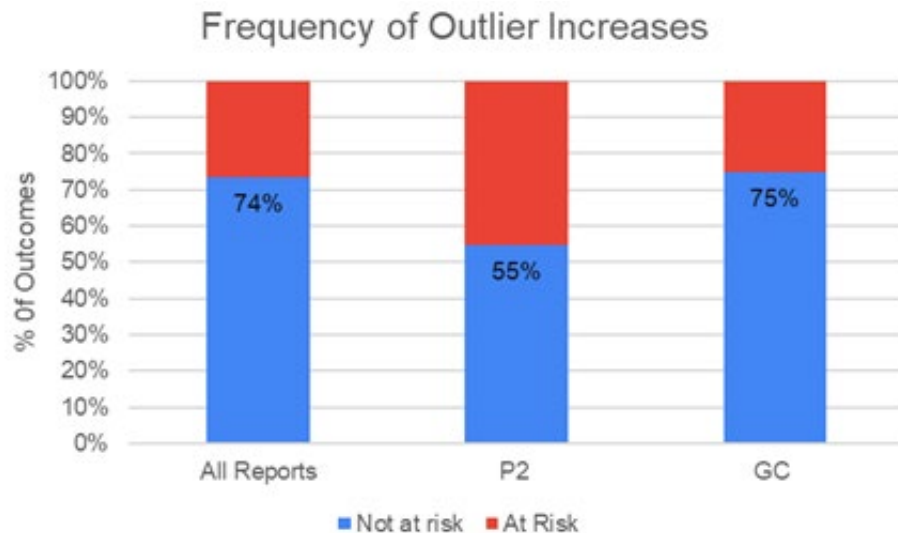
W15- Introduce process analysis systems  
W43- Substitution of feedstock or reagent  
W50- Optimized reaction conditions  
W56- Reduce/eliminate organic solvent  
W57- Use biotechnology  
W84- Developed new chemical product to replace a previous one

## Barrier Codes

B1- Insufficient capital  
B2- Require specific technical information  
B3- Concerned of reduced quality of product  
B4- Source reduction activities were implemented but not successful  
B5- Regulatory/permit burdens  
B6- P2 previously implemented already and not feasible  
B7- No known substitutes or alternatives  
B8- Reduction does not appear to be technically feasible

# Outliers

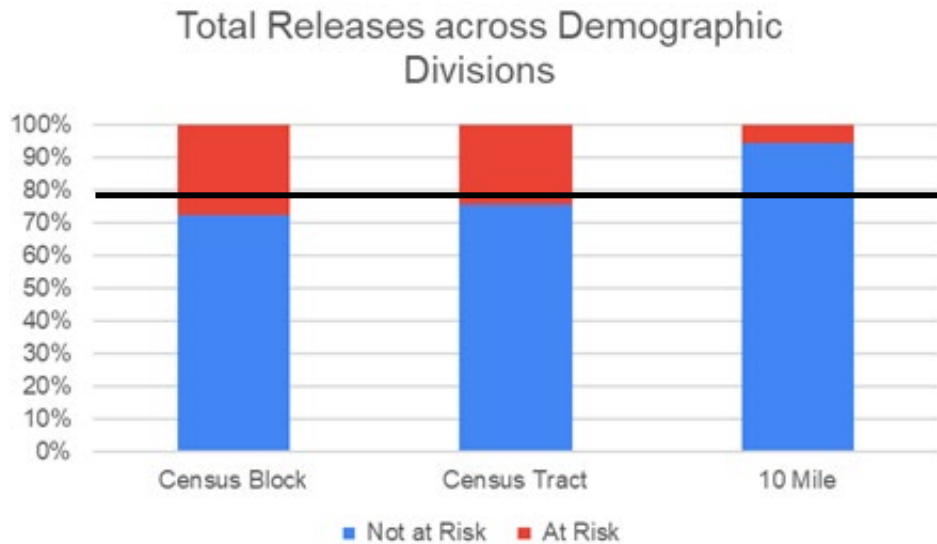
Outlier Change magnitude			
	All Reports	P2	GC
Not at risk	168494%	1137%	150%
At Risk	466759%	698%	302%





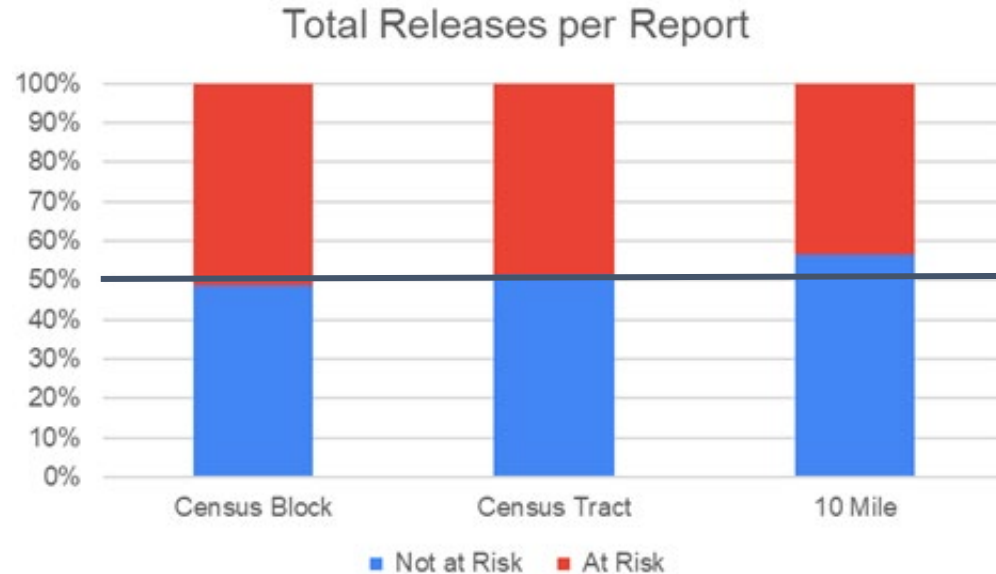
# Toxic Releases

- Releases are reported in four categories: total releases, air releases, and water releases
  - Total Releases: 416,779,450.64 pounds
- Land releases not considered
  - Greater risk of exposure for air and water releases
  - Land releases usually moved to off-site disposal



# Toxic Releases per Report

- Reporting skewed in favor of areas of lower demographic index values
  - Influence of reporting bias analyzed in calculations
- Release Amount per Report = Total Releases ÷ Total Reports



# Outliers

- The same analysis was performed on outlier reports
  - Outlier reports reported more than 7,171 pounds of releases
- Outlier releases show inequitable distribution
  - Demographic divisions show smaller ratio than baseline
  - Outliers in At Risk communities average almost double the amount of releases per report

	Total Releases
Census Block	
Census Tract	

