

Project #1: Centering Community Voices in Policymaking and Planning Efforts

Community Partners:

- *Claire McIlvennie, Data & Equity Policy Manager, VT Dept. of Public Service (PSD)*
- *Richarda Ericson, Outreach Program Manager (PSD)*
- *Jean Hamilton, Director of Program Development, Land Access & Opportunity Board (LAOB)*

Introduction

In 2022, Act 154 was enacted establishing Vermont's environmental justice policy. The law establishes a framework to ensure that all individuals, regardless of race, cultural background, or income, have equitable access to essential environmental benefits (such as clean air, water, healthy food and public transportation) and are not subjected to disproportionate environmental burdens. The policy also promotes meaningful participation of disadvantaged communities in the development of policies and regulations in the state. The policy states:

It is the policy of the State of Vermont that no segment of the population of the State should, because of its racial, cultural, or economic makeup, bear a disproportionate share of environmental burdens or be denied an equitable share of environmental benefits. **It is further the policy of the State of Vermont to provide the opportunity for the meaningful participation of all individuals, with particular attention to environmental justice focus populations, in the development, implementation, or enforcement of any law, regulation, or policy.** (3 V.S.A 6003; emphasis added)

This policy was passed in response to decades of environmental justice (EJ) organizing, which was further galvanized by disparities revealed by the COVID pandemic and George Floyd's murder. In 2021, President Biden issued the Justice40 Initiative via executive order mandating that 40% of federal investments in climate, clean energy flow to disadvantaged communities. Because it was passed as an executive order, much of the Justice40 Initiative was reversed by the Trump administration, but Justice40 helped catalyze an important policy evolution: **to develop effective energy and climate policies we must center community engagement practices that include the communities most often left out of public policymaking and resource decision.**

Vermont's Department of Public Service (Department) is rethinking how it approaches meaningful engagement with the public, taking steps such as:

- Creating a Data & Equity Policy Manager position (Spring 2022) to center equity and environmental justice, including engagement, in the Department's work
- Developing and resourcing public engagement in a 2022-2024 review of Renewable Energy Policies and Programs (see the [Final Report](#) from this effort for an overview)

- Establishing a Community of Practice for Public Engagement (late 2024) internally at the Department to engage in discussions about advancing meaningful engagement across Divisions
- Participating in the Interagency Environmental Justice Committee, as required by the Environmental Justice Law, and helping develop the [Core Principles of Community Engagement](#) published in October 2024
- Hiring a full-time Outreach Program Manager (2025) to support robust community engagement

Project Need

The Department of Public Service is in the beginning stages of developing the 2028 edition of the State [Comprehensive Energy Plan](#). The first phase of this process is to develop a community engagement plan by Spring 2026 and subsequently begin that engagement. Further, the Department needs to develop an internal community engagement plan that adheres to the requirements of Vermont's Environmental Justice Law, which is due in July 2027.

The Department is seeking tools to reorient its approach to policy development to meaningfully center the voices of more Vermonters. The Department is considering how it collaborates with new and existing partners and who it engages with to inform critical policy discussions. To date, the Department has had success engaging communities to develop specific programs, for example around community solar efforts, but has had less experience successfully engaging communities in higher level policy development and resource planning activities. These higher elevations of policy making are difficult to translate into plain language and relevant time frames, often leaving disadvantaged communities feeling like it is not worth their limited discretionary time and energy to weigh in.

One promising new tool is the Land Access and Opportunity Board (LAOB), an independent state board enacted in Section 22 of Act 182 of 2022 to improve access to woodlands, farmland, and land and home ownership for Vermonters from historically marginalized or disadvantaged communities who continue to face barriers to land and home ownership. The LAOB gives disadvantaged communities statutory powers to assess, advise, and remedy state policies and programs that perpetuate discriminatory disadvantage to housing and land. Housing and land connect to many different policy areas including land use, agriculture, public health, environmental justice, and of course energy and climate action. LAOB is actively connecting disadvantaged communities into policy making processes through targeted (e.g. hosting culturally relevant community meetings to develop community-led land use policy statements) and systems-wide interventions (e.g. promoting and training state actors on the Spectrum of Community Engagement to Ownership). The LAOB's mandate is directly connected to the Department's community engagement efforts.

This project builds upon the work of a team of students from the [Spring 2023](#) senior practicum that conducted initial research on implementation of Environmental Justice Law in Vermont. That

effort included interviews with members of the Interagency Environmental Justice Committee and the Environmental Justice Advisory Council as well as case study research on how other states were implementing Environmental Justice Laws. This team will now revisit that foundational effort and focus more deeply on implementation of meaningful participation efforts.

Students will interview experts to support desk research on best practices in centering community engagement in policy or planning efforts to glean core lessons learned (i.e. what efforts succeeded and should be replicated? What efforts struggled and hold valuable lessons learned?).

Research themes may include:

- How are government agencies defining and operationalizing "meaningful engagement" in practice? Are there key criteria or characteristics that provide useful indicators of what makes engagement "meaningful"?
- How have government entities put meaningful engagement at the core of their policy development and planning work? What have they learned from past experiences? What's worked well and where have they struggled?
- How have they identified who should be engaged and the appropriate ways in which to engage different communities?
- What examples are they looking to for guidance or ideas?
- How do approaches (and successes and failures) vary by scope and scale and/or other key characteristics of the engagement effort?
- What are the primary challenges government entities have faced in successfully engaging communities to inform the outcomes of policy development processes? (e.g. communities' lack of trust in government; cultural barriers between government processes and communities, political dynamics between state agencies and lawmakers, etc.)
- What upcoming policymaking opportunities should be prioritized as high-leverage community engagement opportunities?

This work will give you the opportunity to talk to and listen to policymakers and EJ advocates in boundary-spanning work across organizations and agencies as they attempt to operationalize meaningful community engagement. This systems-level engagement will lay important groundwork for your partners.

Deliverables

- A suite of best practices as well as practices to avoid in order to advance meaningful engagement derived from case study reviews and interviews
- A series of brief (2-3 pages) case study reviews summarizing engagement efforts reviewed and key takeaways from each effort

- A short narrative report describing the interviews conducted and key takeaways or themes

Resources

- [The Spectrum of Community Engagement to Ownership](#)
- [Vermont Department of Health Community Engagement Guide](#)
- Department of Public Service Renewable Energy Policy Review:
 - [Public Engagement Plan](#)
 - [Final Report](#) (see slides 18-36 for an overview of engagement work; slide 7 for links to additional resources)
- Hawaii State Energy Office – [Energize Kakou Community Engagement Report](#)
- [Core Principles of Community Engagement](#)
- [Connecting People to Power](#)

Possible Interviewees (whom you might consider reaching out to for background and/or advice)

- Charlotte Safran and Amy Redman, Vermont Department of Health
- Sarah McIlvennie and Abbey Willard, Vermont Department of Agriculture, Food, and Markets
- Sophi Veltrop, Juliet Birch, and Karla Raimundi, Vermont Agency of Natural Resources
- Shalini Suryanarayana, Vermont Office of Racial Equity
- Britaney Watson and Herryng Herzog, Vermont Community Broadband Board

Project #2: Sharing Stories to Advance a Statewide Ratepayer Protection Program

Project Partners

- *Katayoun Lam, Organizer with 350VT*
- *Mieke Riddlebarger, Organizer with 350VT*

Background

350VT is a grassroots climate justice non-profit that was founded in 2011 in the wake of the [2010 Global Climate Work Party](#). Our focus has been on building a people-powered and people-led climate justice movement in Vermont for a just, thriving world.

One of the things that sets us apart from the many other climate organizations in Vermont is our strong focus on justice. We believe that the climate crisis impacts all of us, but it disproportionately impacts those who have been excluded from decision-making tables, particularly BIPOC, frontline, and low-income communities. We work to address how privilege and oppression show up in our organization, as well as in the wider world. We believe that learning from and working with partners from the communities most impacted by the climate crisis, and making the connections between the climate crisis and interconnected injustices explicit, is essential for transforming what is politically possible.

One project that 350VT and our volunteers have been working towards over the past few years is a statewide [ratepayer protection program](#). In 2024, our advocacy contributed to legislation passed in 2024 that directed the [Public Utility Commission](#) (PUC) to review existing programs to reduce utility costs, consider whether a statewide electric ratepayer protection program is needed, and make a recommendation to the legislature on what this might look like. In 2025, we launched a ratepayer protection campaign to further advocate for a statewide electricity assistance program. The [PUC study](#) was released on December 1st, and unfortunately, the study did not recommend a statewide assistance program. To continue this work, we want to gather and share stories of Vermonters who have struggled with their electricity bills to persuade legislators, the PUC, and the public that there is a need for this sort of assistance program.

Project Context

What is ratepayer protection?

- A statewide electricity assistance program would ensure that low- and middle-income Vermonters can afford their electric bills.

Why is it needed?

- [Electricity in Vermont is expensive](#): our state has an average electric rate of [22.57 cents per kilowatt hour, 34.90% higher than the US average rate of 16.73 cents](#).

- Assistance programs exist in Vermont but are underutilized, difficult to apply for, and offer significantly lower discounts than [those in other states](#). Not all electric utilities offer assistance programs.
- Vermont has the [third-highest energy burden](#) in the U.S.: [A widely accepted national threshold of affordability](#) holds that households should pay no more than 6% of their income on energy costs. Yet 74,000 Vermont households living at or near the poverty line are paying [between 11% and 51% of their income on energy](#). The majority of this burden is due to reliance on expensive fossil fuels for heating and transportation.
- As Vermont phases out fossil fuels, households will rely more on electricity to meet their needs for home heating and cooling and transportation. Ratepayer protection would allow for electrification without the fear of rising costs, resulting in savings for households, more affordable heating, and a greener future.
- A statewide ratepayer protection program would be an important foundation on which to build future bold climate policy.

For additional information on ratepayer protection, the PUC study, and our response, please [check out this document!](#)

Project Need

As part of our ongoing efforts to advocate for a statewide electric ratepayer protection program in Vermont, we want to gather stories of Vermonters who have struggled to pay their electric bills. These stories will be an essential part of future efforts to implement such a program. We hope to share them with legislators, the Public Utility Commission, and the public, to raise awareness about the burden of electricity in Vermont and the need for a solution.

Project Objectives

- Find Vermonters who have struggled to pay their electric bills, received disconnection notices, had their power disconnected, or otherwise dealt with electricity burden
- Talk to these people, listen to their stories, and collect them into a portfolio
 - Process matters! Ensure you have taken the necessary steps to approach prospective interviewees with appropriate care and respect. You cannot use their stories without their permission and their informed consent, and you'll need to establish clearly how you are allowed to use their stories, and what parts you can use.
- Organize and present these stories in creative and compelling ways to engage the public, legislators, and the PUC
- Figure out how to share these stories in service of shifting the public narrative

People you could talk to (for background, advice, and more):

- [Rebecca Dalgin](#) – 350VT Organizer
- [Destinee Pierce](#) – VT Environmental Justice Network Manager, was involved with our ratepayer work trying to help us find stories

- [Debbie New](#) – very knowledgeable volunteer on our ratepayer protection work
- [Earl Hatley](#) – volunteer on our ratepayer protection work who also shared his own story
- [Jim Dumont](#) – environmental lawyer, the leading policy expert on our ratepayer protection work
- [Marisa Keller](#) – was involved in our ratepayer work trying to help us find stories
- [Dara Torre](#), [Chris Morrow](#) – legislators who we have a close relationship with and who support our Ratepayer work
- [Edward McNamara](#), [Margaret Cheney](#), [Riley Allen](#) – Commissioners on the Public Utility Commission

Potential orgs to collaborate with:

- [The Root Social Justice Center](#)
- [Vermont Environmental Justice Network](#)
- [Vermont Interfaith Power and Light](#)
- [Richard Kemp Center](#)
- [Peace and Justice Center](#)

Further Reading and Resources:

- [350VT History](#)
- [350.org History](#)
- [What are public utility commissions?](#)
- [Testimony from Jim Dumont on the need for a statewide electricity assistance program](#)
- It might be worth seeing what you can find from VPR, Brave Little State, and/or other Vermont-focused podcasts who may have covered this topic in the past. These examples could serve as useful inspiration, but you could also consider speaking with the producers and/or the people covered in whatever stories you discover
- Don't hesitate to ask your professor, other ES faculty, and your community partners for resources about more specific topics as you begin to dig into your investigations and story-telling project

Project #3: Strategic Corporate Research For Labor Organizing in Vermont

And if there's one thing that unites [us]...it's a commitment to building a specific method of organizing: structure-based organizing. Because it's not just enough to fight. What our side needs is to fight back and win.¹

Jane MacAlevey

Project Partner: *Finn Lester-Niles, Organizer, Workers United*

Context & Background

For at least two centuries, one of the most important and consequential vehicles for class struggle across the globe has been the labor movement, composed of various labor unions across industries and continents working together to materially improve lives and reshape society. At their core, labor unions are collectives of co-workers who join together to improve their working and living conditions by leveraging their collective power and positioning as workers. In recent history, labor unions have been responsible for the passage of landmark wage and hour laws throughout the globe, winning the minimum wage, child labor laws, the 40 hour-work week, and crucially, the right to organize a legally-recognized labor union with federally-protected collective bargaining rights. Despite decades of fiery and at times bloody battles to win and protect this fundamental right, unions today face an existential threat.

Amid these challenges, the popularity of unions in the United States has reached its highest levels in 60 years, with a 70% approval rating.² As more people see the connection between declining union density and rising income inequality, Americans' preference for labor unions over big business has grown to all-time highs. And yet, union density in this country hovers around the lowest levels it's been in over a century. Today, national union density is 9.9%.³ Union density in the private sector is only 5.9%. The Economic Policy Institute estimates that 60 million Americans would join a union if they could.⁴

These statistics reflect significant structural barriers to unionizing that American workers face. At present, the deck is stacked against workers. One of the least organized working classes in U.S. history is being matched up against the wealthiest owning class of all time. The owning class brings lawyers, lobbyists, and the coercive power of workplace discipline on their side. Workers have each other and a handful of decades-old labor rights that are routinely and intentionally

¹ <https://www.rosalux.de/en/news/id/43227/its-not-enough-to-fight-we-have-to-want-to-win>

² <https://www.epi.org/blog/americans-favor-labor-unions-over-big-business-now-more-than-ever/>

³ <https://www.bls.gov/news.release/pdf/union2.pdf>

⁴ <https://www.epi.org/publication/millions-of-workers-millions-of-workers-want-to-join-unions-but-couldnt/>

ignored by companies that would rather pay exorbitant legal fees than respect their employees' right to organize.

This tremendous power imbalance means that the stakes have never been higher. Runaway inequality is ripping at the seams of society at the same time that runaway greenhouse gas pollution threatens the viability of life on our planet. Evidently, those in charge of this system have continued to value profit over both people and planet and will keep doing so unless and until the working class is able to build the collective power necessary to interrupt this disastrous pattern and usher in a more just, democratic, and regenerative society. It would not be an exaggeration to say we have a world to win. In this context, it's vital not only for workers to build collective power – but also to know how and where to use it.

Project Need

For this project, students will conduct [Strategic Corporate Research](#) on a specific company to identify key pressure points and levers of influence to help workers decide how and where they can most effectively exercise their collective power. Using a systematic framework developed by professor Tom Juravich of UMass Amherst, students will dig into the nuts and bolts of how a given company operates and develop a comprehensive power structure analysis that will help inform the strategy and tactics that workers can utilize to win their union campaigns.

Students will explore key investors, suppliers, distributors, community affiliations, legal histories, and other relevant characteristics of the company in question with an eye towards winning union elections and contract campaigns. The final deliverable will be a report that details students' findings and provides strategic and tactical recommendations for the organizing workers.

In addition to conducting this research, students will have the opportunity to gain hands-on organizing experience by assisting active union campaigns in Vermont. By participating in various actions, students can gain a better, real-world understanding of the sorts of tactics they will eventually be recommending and experience a more immediate, visceral understanding of the powerful forces at play in a union organizing fight and the very real stakes for workers.

Project Objectives

- Produce a detailed power structure analysis that will aid workers in their campaign for a labor union and collective bargaining agreement. This analysis might include:
 - Researching key suppliers, distributors, stakeholders, branding strategy, work force, internal structure, policies, political connections, etc. to identify key pressure points that can be leveraged to win the right to organize
 - Identifying case studies of similar campaigns in similar industries that could help inform workers of what tactics were and were not effective and why

- Offering advice and recommendations to union workers as to potential strategies and tactics for their campaign, informed by your strategic corporate research
- Directly participate and observe campaign tactics in action, which might include attending organizing meetings and picket lines, helping out with flyering / leafleting, engaging in organizing conversations, etc.

Some Starting [and/or Guiding] Questions

- What is the difference between strategy, tactics, and a theory of change?
- What is a union? What is the basic, formal process for forming a union and winning a collective bargaining agreement?
- What is the difference between mobilizing and organizing?
- What are the key strengths, weaknesses, opportunities, and threats held by the group of workers that you are working with? How about for the target company?
- What are the internal and external power structures at play within and beyond the walls of the target employer and how might these structures inform the campaign?
- What are different types of power that workers can build and when/why are the different types most effective?

References, Resources, and Further Reading

- Umass Amherst's *Strategic Corporate Research* website [[link](#)]
 - Resources [[link](#)]
- Juravicj et al. (2025) *What the Boss Doesn't Want Us to Know: Discovering Power & Winning Campaigns* [[link](#)]
- Juravich, T. (2007) *Beating Global Capital (in Global Unions: Challenging Transnational Capital Through Cross-Border Campaigns)*. [[link](#)]
- McAlevey & Lawlor. *Rules to Win by: Power & Participation in Union Negotiations* [[link](#)]
- McAlevey, J. (2016) *No Shortcuts: Organizing for Power in the New Gilded Age* [[link](#)]
- Organizing for Power: Organize for Power Training [[link](#)]
- U.E. [How to Form a Union](#) and [Further Resources](#)
- [EWOC Training](#) (March 4, 11, 18, 25, 9-10:30, virtual)
- Really, anything by McAlevey (Dan: there's also that short video about "Real Organizing" which I assigned to the whole class [[link](#)])

Other Contacts

Here are a few subjects experts and interviewees you might reach out to for further background and/or advice as you develop your project:

- Jamie McCallum, Middlebury College
- Tom Juravich, UMass Amherst

- Casey Moore, Organizing Director for Workers United
- Richard Bensinger, Former Organizing Director of the AFL-CIO
- Liz Medina, Former Executive Director of the Vermont State Labor Council
- Organizing and Bargaining Committee members from Workers United shops and campaigns

Project #4: Protecting Communities from Climate-Driven Toxic Inundation

Project Partner

Lee Wasserman, Director, Rockefeller Family Fund

Potential Resource Partners

Zoe Klass-Warch, Program Manager, Rockefeller Family Fund; Chris Kilian, Vice President for Strategic Litigation, Conservation Law Foundation.

Context

Major oil companies have had a sophisticated understanding of the science and consequences of climate change for decades. Several of the companies have taken measures to protect some of their more recently built assets from climate-related harms and incorporate climate change into their business plans, e.g., planning to drill in the Arctic as sea ice melts; increasing the height of offshore drilling platforms.¹ Despite this knowledge, many of these companies have done nothing to fortify existing facilities that present known dangers to surrounding communities from climate-driven events such as sea level rise, more intense hurricanes, and heavier precipitation events. Most of these facilities are in low-income, environmental justice communities. Indeed, many of these communities and adjoining aquatic and terrestrial ecosystems have already suffered from incidents of toxic inundation.²

The failure of these companies to remediate known risks is a violation of at least two federal statutes: the Clean Water Act (CWA) and the Resource Conservation and Recovery Act (RCRA), and, possibly, state common and statutory laws. The federal statutes require companies to address known risks to these facilities, including climate risks.

The Conservation Law Foundation (CLF) has pioneered litigation under these federal statutes, targeting facilities in environmental justice communities in three New England states, Massachusetts, Connecticut, and Rhode Island. The first case was brought against Exxon for a facility in Everett, Massachusetts. Exxon agreed to close the facility rather than go through discovery and trial.³ Two cases against Shell—one in New Haven and one in Providence—have survived multiple challenges by the company’s lawyers and went through the “discovery process,”⁴ where Shell was required to produce millions of pages of relevant corporate documents. The New Haven case is expected to go to trial or settle within the next few months.

¹ <https://www.latimes.com/business/la-na-adv-exxon-arctic-20151011-story.html>

² See, e.g., <https://www.clf.org/blog/endangering-everett/>

³ <https://www.clf.org/blog/exxon-sells-polluting-everett-facility/> see also, <https://www.wbur.org/news/2023/12/06/exxon-settles-suit-with-conservation-law-foundation-over-everett-site>

⁴ https://www.americanbar.org/groups/public_education/resources/law_related_education_network/how_courts_work/discovery/

These cases established the viability of this type of legal action and their ability to address ongoing toxic threats to communities caused by climate change. When the discovered documents are made public, they will also serve as a teachable moment to explain the depth of climate knowledge these companies had and how they failed to alert the public about the threat or incorporate the climate threat—which Exxon and Shell foresaw as “catastrophic”⁵—into their business plans.

Project Need

Given this promising track record, we believe the time is right to assess the condition and legal compliance of facilities located down the Eastern Seaboard. Given the extensive coastline of Eastern states, the dense populations in the shadows of these facilities, sea level rise, extreme weather events, and the increasing intensity of hurricanes traveling up the coast, there is a pressing need to fortify or close these facilities before they cause or continue to cause serious harm.

Because the resources necessary to bring these types of actions are limited, it is critical that a rigorous analysis is conducted to identify facilities which are likely to cause significant natural resource damage or harm to communities and individuals. Advocates also want to pursue cases that present a meaningful opportunity for success, which is why we will need to limit the search to facilities that have certain legal and factual characteristics. (For instance, while the Gulf states contain many facilities presenting these risks, the federal courts in those states have a history of being unsympathetic to citizen groups suing to ensure compliance with environmental laws.)

Therefore, as we consider possible enforcement opportunities, we must keep two threshold requirements in mind: (1) the facilities must be subject to the Clean Water Act (CWA) and the Resource Conservation and Recovery Act (RCRA); and (2) be located in states where courts and regulatory agencies are more sympathetic to citizen or state attorneys’ general enforcement actions, e.g., New Jersey, Pennsylvania, Delaware, Maryland, Virginia, Puerto Rico, U.S. Virgin Islands.

Project Objectives

The primary objective of this project is to develop and implement a methodology leading to identification of six to ten facilities that are prime opportunities to advance the goals of this initiative: protect endangered communities from known climate risks caused by these facilities; require cleanup or additional cleanup of communities that have already faced toxic inundation from these facilities.

There is no best path for identifying these facilities. There are a series of questions, answers to which could produce important elements in the final calculus. Prioritizing the importance of these elements, or development of new elements, combined with a prediction about the likelihood of legal success, is an art, not a science.

⁵ <https://www.science.org/doi/10.1126/science.abk0063>

Some starting questions

- Are the facilities particularly vulnerable because they are in a flood prone area or more likely subject to extreme climate-driven events?
- Are the facilities covered by the Clean Water Act (CWA) and the Resource Conservation and Recovery Act (RCRA)? Both acts contain citizen suit provisions that enable state citizens or attorneys general to bring actions to redress violations under these acts.
- Are they located in the states or territories most likely sympathetic to these types of actions?
- Is there a history of community harm and/or engagement around the facility?
- Have the facilities already shown that oil is leaking into groundwater / neighboring properties that may not have been adequately cleaned up?
- Have the facilities been responsible for a history of violations and/or enforcement actions under their operating guidelines?

Some additional important questions

- What is the company's history addressing climate change risks?
- What are the histories of state attorneys general in the respective states and territories when it comes to climate change and environmental enforcement generally?
- Any relevant decisions by the federal circuit court in which the facility is located?
- Were there EPA enforcement actions undertaken by the Biden administration against any of the facilities that stopped in 2025?
- Were the facilities built before 1990 and not yet upgraded?

Some starting points for research

1. A [tool developed by Climate Central](#) to assess facilities flooding risk.
2. The problem of flooding and toxic inundation due to climate change as reported in [Scientific American](#).
3. The effect of pollution or the risk of pollution due to climate-related events on fenceline communities is addressed [in this NIH article](#).
4. A federal court's decision ruling against Shell's Motion to Dismiss the Conservation Law Foundation's (CLF) case in New Haven based on Shell's violation of the CWA and RCRA [can be found here](#).
5. [ECHO](#) is the primary public database run by EPA for searching compliance and enforcement data across the U.S.
 - a. **EPA eDisclosure Portal.** Regulated entities use the [eDisclosure portal](#) to voluntarily self-disclose civil violations. Companies that discover violations through voluntary self-audits must disclose them within **21 days** to potentially qualify for penalty reductions.
6. **Discharge Monitoring Reports (DMRs).** Facilities with National Pollutant Discharge Elimination System (NPDES) permits must submit regular [DMRs](#) that detail their

pollutant discharges. If a facility's discharge exceeds its permit limits, it is considered a self-reported violation recorded in the EPA's **Integrated Compliance Information System (ICIS)** and viewable on ECHO.