



Making America Polluted Again The Trump EPA's 2025 Enforcement Record



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Executive Summary

A deep dive into records of the Environmental Protection Agency in 2025 shows that its enforcement activities fell across almost all of the agency's legislative mandates. For some of its most important enforcement responsibilities, the track record of the Trump 2.0 EPA in 2025 is the worst of any administration in the last 20 years.

This administration's poor showing in overseeing and penalizing polluters comes in the context of longer term declines in most of the EPA's enforcement activities starting around the early 2010s. The first Trump administration's aversion to detecting and punishing environmental violations, coupled with COVID's challenges, left EPA enforcement in a weakened state that [the Biden administration struggled to bolster](#). Since an even more enforcement-averse Trump administration returned to the White House in January 2025, the EPA's efforts to surveil and seek punishment for pollution have tumbled further, well below early-century highs.

Enforcement in Trump 2.0's EPA compared to Biden's:

- The EPA of the second Trump administration has launched fewer civil judicial cases than any other administration in the past 20-years: just eight, one-third of what the Biden administration initiated in 2024.
- While this Trump EPA initiated and concluded more administrative civil cases than Biden's EPA (the only category in which this administration significantly surpassed its predecessor) average fines dropped significantly (29% by cases filed; 19.5% by cases closed), and the share settled without any fine rose substantially (60% by cases filed though only 5% by cases settled (including many begun before 2025)).
- EPA inspection activities dropped across the board during 2025—those for air pollution, waste, and drinking water, as well as toxic substances. Inspection work under the Clean Water Act (CWA) fell the least dramatically, while inspections under the Toxic Substances Control Act (TSCA), including for lead paint, dropped by over a third.

Trump 2.0 EPA enforcement in the context of longer-term trends and challenges:

- COVID had a dramatic, lasting effect on enforcement activities, exacerbated by the Trump 1.0 EPA's crippling of enforcement. The Biden EPA's efforts to repair damage were only partially successful, leaving EPA enforcement susceptible to further weakening under the new Trump administration.

- Under this Trump EPA, enforcement has made a historic retreat from the courtroom. The number of judicial cases initiated and concluded in 2025 are by a considerable margin lower than any year since 2005.
- During the second G. W. Bush administration and first Obama administration in the early years of this century, most enforcement activities plateaued at remarkably high levels compared to today. The EPA under Bush and Obama conducted considerably more inspections under the Clean Air Act (CAA), Resource Conservation and Recovery Act (RCRA), Safe Water Drinking Act (SWDA), and Toxic Substances Control Act (TSCA). In these years, the EPA initiated many more cases against violators, and considerably more of its penalties and compliance costs surpassed zero dollars.
- Since 2012, enforcement activities including inspections, lawsuits, and fines have generally declined.
- Overall, the decline of EPA enforcement in 2025 has been record-breaking in its severity. In 2025, the EPA had the weakest enforcement over the past 20 years in 7 (or 29%) of the 24 categories of enforcement activities measured and the second weakest¹ enforcement in another 7 (29%).

Introduction

"[B]y ignoring environmental costs we have given an economic advantage to the careless polluter over his more conscientious rival. While adopting laws prohibiting injury to person or property, we have freely allowed injury to our shared surroundings. Conditioned by an expanding frontier, we came only late to a recognition of how precious and how vulnerable our resources of land, water, and air really are."

—Richard Nixon, "[Special Message to Congress on Environmental Quality](#)," February 10, 1970.

Republican President Richard Nixon oversaw the founding of the U.S. Environmental Protection Agency (EPA) and signed major environmental legislation such as the Clean Air and Water Acts that empowered the agency to protect human health and the environment. Over the past year, EPA Administrator Lee Zeldin, under a very different Republican President, has turned the original mission of this agency on its head. Zeldin [publicly prioritized the growth and profits of favored industries over the health and welfare of American communities](#). He has steered the agency toward deliberately ignoring

¹ Second only to 2020, when the COVID-19 crisis began.

environmental costs imposed by polluters, including from [greenhouse gas emissions' and their dangers from climate change](#) and [air pollution's impact on disease and death](#). Despite this, he and his press office [declare their commitment](#) to “making sure future generations inherit cleaner air, cleaner water, and a brighter future.”

Our environmental laws only work if they are enforced. Understanding an administration's enforcement policies provides insight into their commitment to upholding environmental laws. Zeldin and his appointees said little publicly about their enforcement policies until December 2, 2025, when they [issued a memorandum](#) articulating a “compliance first” policy, stating their priority was “achieving and ensuring timely compliance” through “the most efficient, most economical, and swiftest means possible.” Conspicuously missing in their statement is any role for the legal system in forcing polluters to take action.

This represents a dramatic and historic shift in how EPA handles its mandate of enforcement. Even when the G. W. Bush EPA [announced a similar commitment](#) in the early 2000s, it was taking polluters to court 20 times more often than what EDGI and others have documented for 2025 (Figure 28). As reports from [USA Today](#), [EarthJustice](#), [Public Employees for Environmental Responsibility](#), and the Environmental Integrity Project (forthcoming) show, the number of legal cases passed from the EPA to the Department of Justice for prosecution in 2025 plummeted past the 2020 dip during the first Trump administration, setting a troubling new record for this agency in the modern era.

This report affirms these results and probes enforcement processes that precede or side-step legal proceedings. While EPA's press office continues to [dole out random and suspect tallies of EPA activities as “achievements,”](#) analyzed in a [recent EDGI report](#), the agency's enforcement activities are systematically recorded in public databases, in particular the [Enforcement and Compliance History Online](#) (ECHO). EPA publishes [annual fiscal year \(FY, from October 1–September 30\) summary reports](#) on the metrics available in ECHO and other agency databases. These reports are usually issued in December, but the Zeldin EPA has not yet released a FY2025 report. Given the lack of a FY2025 report and Zeldin's EPA's pattern of [“messaging that sows confusion, contradiction, and division,”](#) EDGI researchers used the ECHO database to develop an assessment of EPA's enforcement metrics this past year and to place that record in a historical context.

The first part of our report compares the second Trump administration (Trump 2.0) EPA's enforcement record to that of the Biden EPA. There we demonstrate an unmistakable decrease in inspections and substantial penalties when violations are found. The rest of our report places EPA's 2025 enforcement record within longer-term patterns. We show

how, almost across the board, the enforcement drops evident during Trump 2.0 extend a longer term trend in decline in enforcement activities which had accelerated during Trump's first administration. Viewed in this context, the decline of cases, inspections, and penalties during 2025 only extend and exacerbate the ongoing retreat of EPA from enforcement since the start of the 21st century. This accelerating decline augurs deepening dangers to Americans' health and mounting damage to their communities and environments in the years ahead.

Methodology

To analyze what EPA is doing to enforce our environmental laws, we drew on EPA's own data from ECHO, which pools records across the agency's several enforcement and compliance systems. Using this data, we've compiled 24 different metrics of EPA's enforcement activities from 2005 to 2025 (Figures 8-31; see p. 2 for list of figures). While we've tried to draw in all relevant data available in ECHO to reach our conclusions, for some data series, the numbers we found most useful were available from one of EPA's data systems—ICIS-FE&C—but less accessible in others. We've noted those cases in figure captions.

All data are from 2005–2025; we do not include any from 2026. While some data available also extend to earlier years, we selected 2005 as our starting year after preliminary probes suggested some data series we intended to analyze were incomplete for 2004 and earlier.

Rather than analyzing the data by fiscal year, which is how EPA presents this data, we chose to present the data annually from January 21–November 30. Beginning the year at January 21 allows us to accurately account for differences in presidential administrations during transition years. Ending our interval on November 30 allows us to account for the 30-60 days that former EPA staff have informed us it takes those undertaking enforcement actions across the country to record their activities in the database. Given that we pulled all data on January 19 and 20, 2026, we felt we could assume data was complete up until November 30, 2025.

In all of our analysis, we treated the data from 2020 the same way as other years, but recognize that this data reflects the impact of the COVID-19 crisis and not necessarily policies of any administration.

Undoubtedly many of our results for 2025 reflect the impact of staffing cuts both at the EPA, subject of [an earlier EDGI report](#), and other agencies, notably the Environment and Natural Resource Division of the Justice Department. This report concentrates on those

numbers that are a precondition for analyzing the *whys*: what EPA's own data says about what has happened across its entire enforcement process in recent times.

EPA Enforcement Under Trump 2.0 Versus Under Biden

Cases

When the EPA finds violations of our environmental laws, it may initiate an “informal enforcement action,” such as sending a warning letter. But the credibility of any such warning hinges on the agency’s willingness to initiate [a formal enforcement action or “case.”](#) Legal actions against violators consist of two main types: criminal cases (for violations of the criminal code) and civil cases (for violations of civil code). For civil violations, the EPA can pursue two different types of cases: judicial (more serious, generally handed over to the Justice Department for prosecution) or administrative (more common, handled within the agency itself).

1. Criminal: These most egregious and serious cases can result not just in monetary penalties but in prison time for those held responsible. The Zeldin-led EPA has, as of this writing, provided no public data on 2025 criminal cases, though [an agency spokesperson claimed](#) in September 2025 that it had opened more cases in its first six months than Biden. According to ECHO, the Biden EPA initiated 42 criminal cases in its first six months, January 21–July 21, 2021.
2. Civil Judicial: In 2025 the EPA’s willingness to take the worst environmental violators to court suddenly collapsed to a historic low (Figures 1, 28). That so few cases—just eight—began during Trump 2.0 bodes poorly for legal prosecutions in 2026 and beyond. Moreover, the percent of initiated judicial cases resulting in no federal penalty leapt from 43% in 2024 to 57% in 2025 (Figures 4, 29).

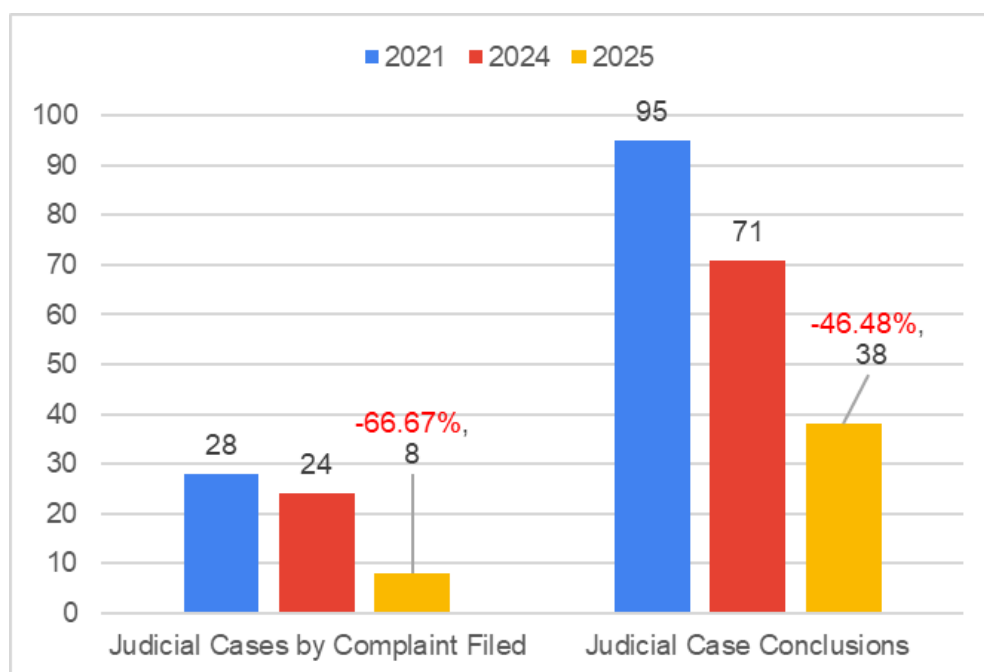


Figure 1. Judicial Cases Started and Concluded Under Biden (2021, 2024) Versus Under Trump 2.0 (2025). Bars are labeled with totals; also for 2025, with the percentage change from 2024. “Complaint Filed with Court” (a “milestone” choice for “judicial” case searches in [the ECHO case search interface](#)) is used as the closest data available through ECHO indicating how many cases were initiated in a given year. “Conclusions” (“milestone” choice for “final order lodged” or “entered” or “concluded” or “closed”) tally how many cases were brought to a conclusion in a given year, many of which were begun in earlier years. Note: Annual cases tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

3. Civil Administrative: By contrast, the Trump 2.0 EPA initiated or concluded somewhat more administrative cases than the Biden EPA in its final and first years (Figure 2). Yet the drops in average fines EPA imposed on offenders (Figure 3) were much more substantial, nearly 30% for newly filed cases and 20% for concluded ones. Here as well, the percent of cases filed and settled with zero federal penalty leapt from 18% in 2024 to 29% in 2025 (Figure 4).

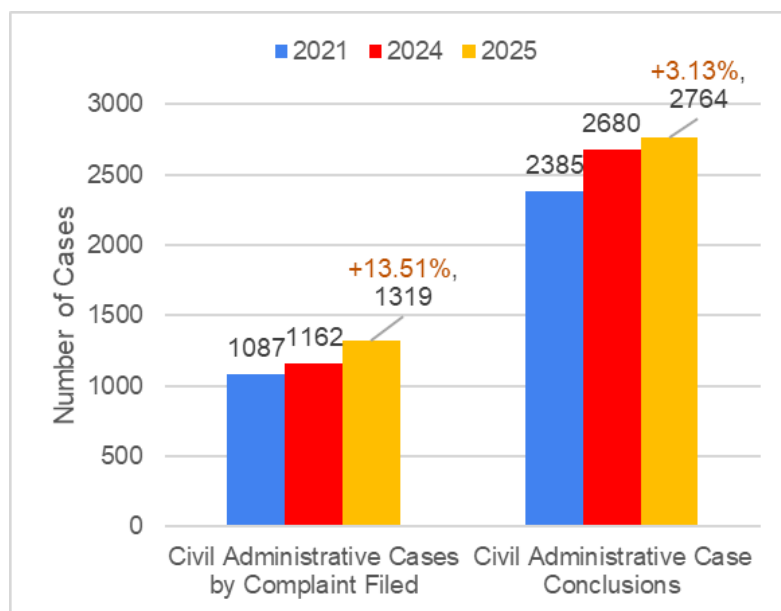


Figure 2. Civil Administrative Cases Started and Concluded Under Biden (2021, 2024) Versus Under Trump 2.0 (2025). Bars are labeled with totals; also for 2025, with the percentage change from 2024. “Complaint/Proposed Order” (a “milestone” choice for “administrative” case searches in the [ECHO case search interface](#)) is used as the closest data available through ECHO indicating how many cases were initiated in a given year. “Conclusions” (“milestone”: “final order lodged”) tally how many cases were brought to a conclusion in a given year, many of which had been begun in earlier years. Note: Annual cases tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

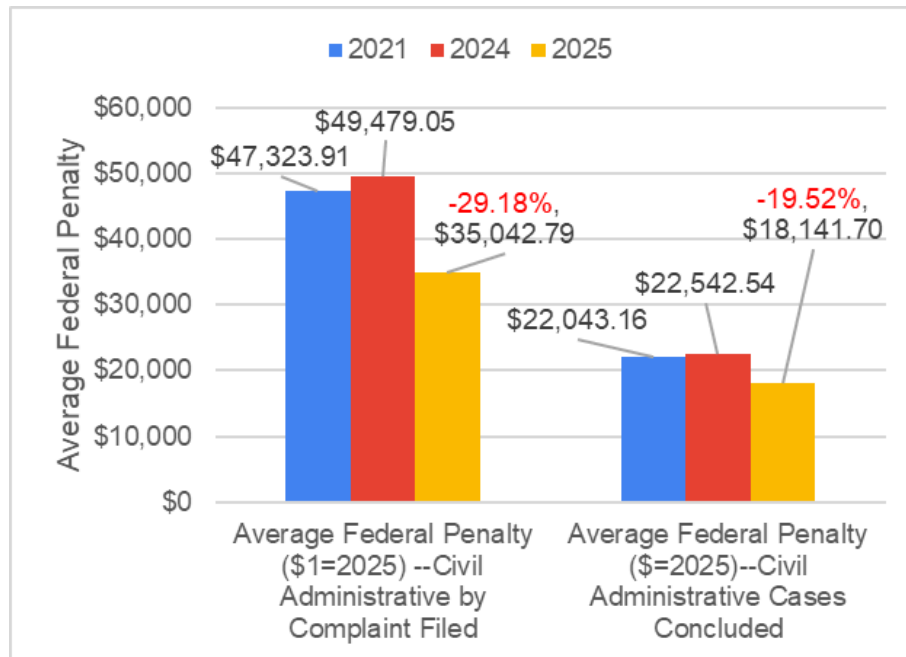


Figure 3. Average Federal Penalties for Civil Administrative Cases Started and Concluded Under Biden (2021, 2024) Versus Under Trump 2.0 (2025). Bars are labeled with the inflation-adjusted averages for each year; also for 2025, with the percentage change from 2024. From here on out, “Complaint/Proposed Order” (a “milestone” choice for “administrative” case searches in the [ECHO case search interface](#)) is used as the closest data available through ECHO indicating how many cases were initiated in a given year. From here on out, “Conclusions” (“milestone”: “final order lodged”) tally how many cases were brought to a conclusion in a given year, many of which began in earlier years. Note: Annual cases tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

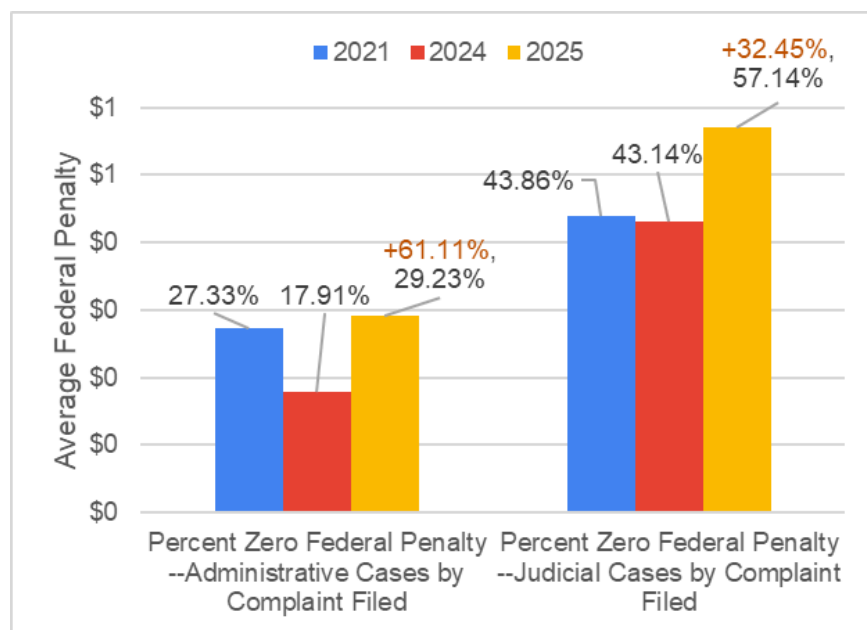


Figure 4. Percent Zero Federal Penalty, Administrative and Judicial Cases Initiated Under Biden (2021, 2024) Versus Under Trump 2.0 (2025). Bars are labeled with the percentage of zero-dollar federal penalty cases; also for 2025, with the percentage change from 2024. Note: Annual cases tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

Inspection Activities

Equally troubling for how EPA's enforcement has changed in 2025 are the declines in inspections and other monitoring activities such as information requests and audits, self-reporting from industries, and electronic data collection (grouped together here as "inspection activities"). These constitute the front end of the enforcement pipeline, enabling EPA to actually find violators and to gather reliable information for possible legal cases. While numbers of inspection activities recovered modestly during the Biden years following their drops during Trump's first term and the COVID epidemic, the 2025 totals for most types of inspection activities have declined.

In 2025, inspection activities targeted at CAA-regulated facilities dropped 14% compared to 2024 (Figure 5). Among the different types of air inspections, full on-site air inspections (which EPA mostly expects to be done by states) fell 9%, and the much more common partial inspections (on-site as well as off-site, on which EPA concentrates) fell more drastically, by 34 percent. Waste inspection activities in 2025 fell by 14% compared to 2024 and by 33% from 2021 (Figure 5). For inspections under the Clean Water Act, the decline from 2024 to 2025 was less marked, under 5%.

Other more specialized inspection activities fell off more dramatically from 2024 to 2025: about 15% for drinking water, 36% for toxic substances, and about 40% for lead paint (Figure 6).

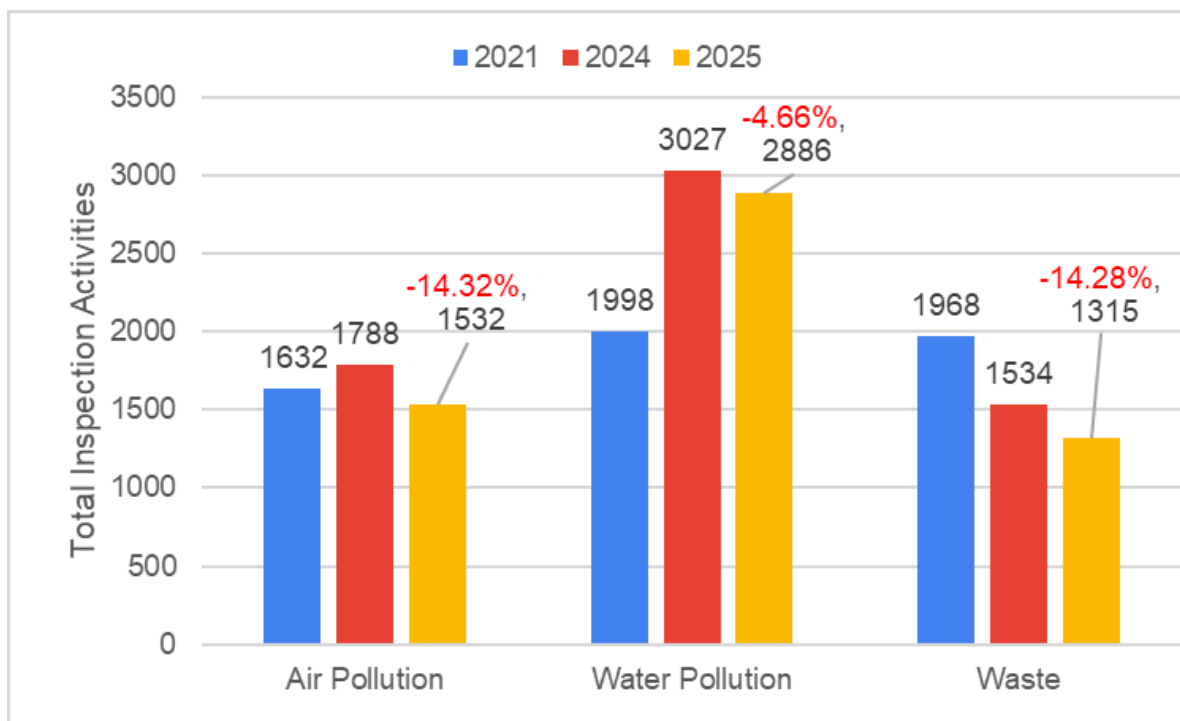


Figure 5. Total Inspection Activities for Air Pollution, Water Pollution, and Waste Under Biden (2021, 2024) Versus Under Trump 2.0 (2025). Bars are labeled with totals; also for 2025, with the percentage change from 2024. The air pollution data refers to activities completed under the Clean Air Act; water pollution, under the Clean Water Act; and waste (including both toxic and solid) under the Resource Conservation and Recovery Act and the Comprehensive Environmental Response, Compensation, and Liability Act. Note: Annual activities tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

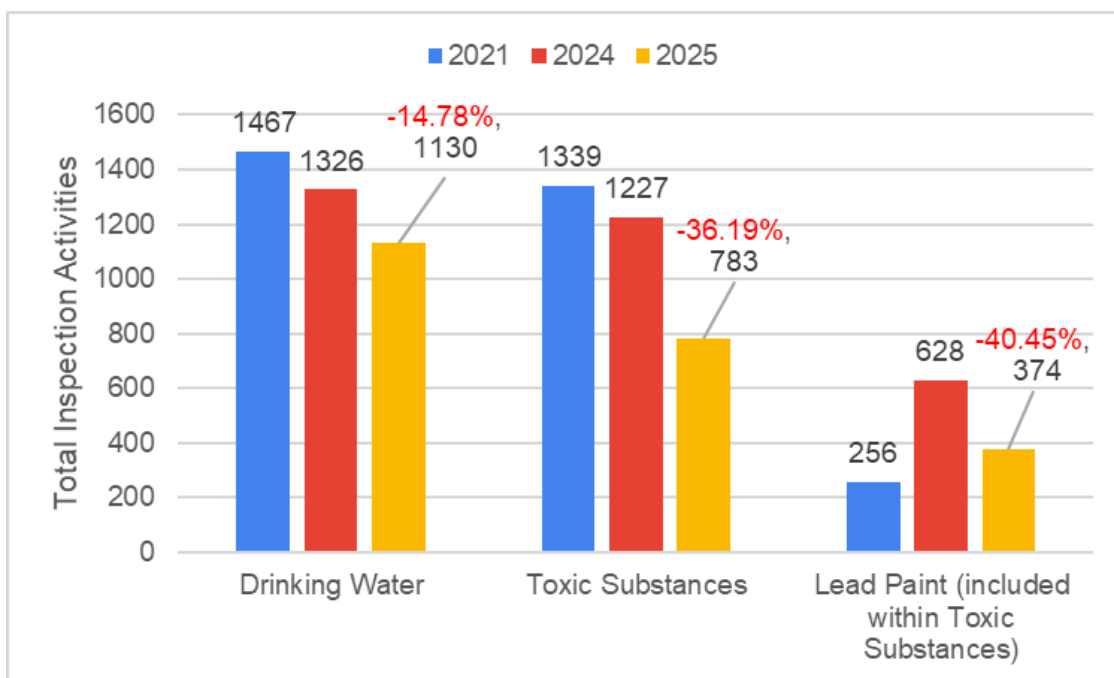


Figure 6. Total Inspection Activities for Drinking Water, Toxic Substances, and Lead Paint from ICIS-FE&C Under Biden (2021, 2024) Versus Under Trump 2.0 (2025). Bars are labeled with totals; also for 2025, with the percentage change from 2024. The drinking water data refers to activities completed under the Safe Drinking Water Act (SDWA); toxic substances activities as well as those for lead paint under the Toxic Substances Control Act. There may also be additional data on these activities not included in ICIS-FE&C, though SDWA data outside ICIS-FE&C is not as frequently updated. Note: Annual activities tracked from January 21 through November 30 each year. Source: ICIS-FE&C in EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

A Longer View of EPA Enforcement Under Trump 2.0

While the Zeldin-led EPA of 2025 reduced many enforcement activities compared to the EPA during the Biden years, this trend is even more concerning when considered over the longer term. For all of Trump and his appointees' obsessions with Biden, they are perpetuating and accelerating a historic trajectory that the Biden EPA was only partly able to correct. The first EPA Administrator William Ruckelshaus famously declared that for EPA to be effective, it had to become a "[gorilla in the closet](#)," stepping in forcefully against polluters when states would not. But since the early years of the 21st century, this agency has undergone a sweeping retreat from robust oversight of polluters and vigorous implementation of federal environmental law. The Trump 2.0 leadership seems determined to further impair the EPA, making it [more sheep than gorilla](#).

As Figure 7 shows, of 18 categories of enforcement activity studied for which higher numbers means more enforcement activity, many 2025 numbers constitute either the lowest (four) or the second lowest (also four, and second only to 2020, when COVID struck) annual figures for the entire 20-year period under study. Of six categories of enforcement studied for which higher numbers means fewer or lesser penalties (such as the percentage of zero-dollar penalties), most 2025 numbers constitute either the highest (three) or the second highest (one) for the entire 20-year period under study. Overall, of 24 enforcement metrics studied from 2005-2025, 29.17% (seven) were worst and 20.17% (seven) were second-worst in 2025.

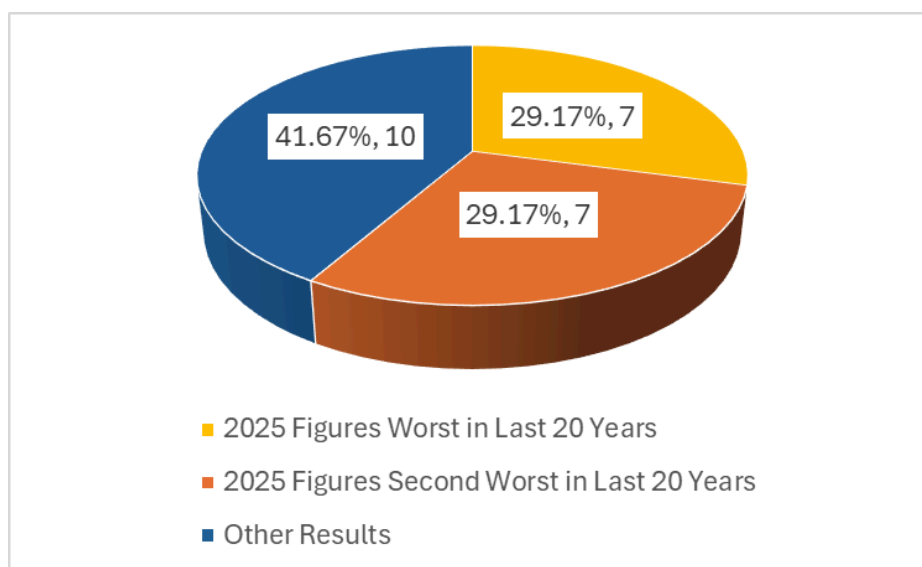


Figure 7. EPA's 2025 Enforcement Record Compared to Last 20 Years, 2005-2025. Summary tabulation of results from the 24 metrics examined in this report. Note: Enforcement record tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

Inspection Activities

For most of the inspection activities we studied, fewer activities were conducted during 2025 than during the Biden years (Figures 5, 6), but the trend was more extreme when a longer time frame was examined. Our summary tabulation of all inspection activities examined (Figure 8) shows that the 2025 total falls far below the median and average for the period 2005–2024. As seen in Figures 9–13 and 15–18, 2025 numbers for most types of inspections approached, or in two cases (partial air and toxic substance inspections) fell below, 2020—the year COVID began and the lowest year in every chart. The exception was inspection activities for the Clean Water Act, which underwent a more modest slide during the 2010s into the early 2020s (Figure 12).

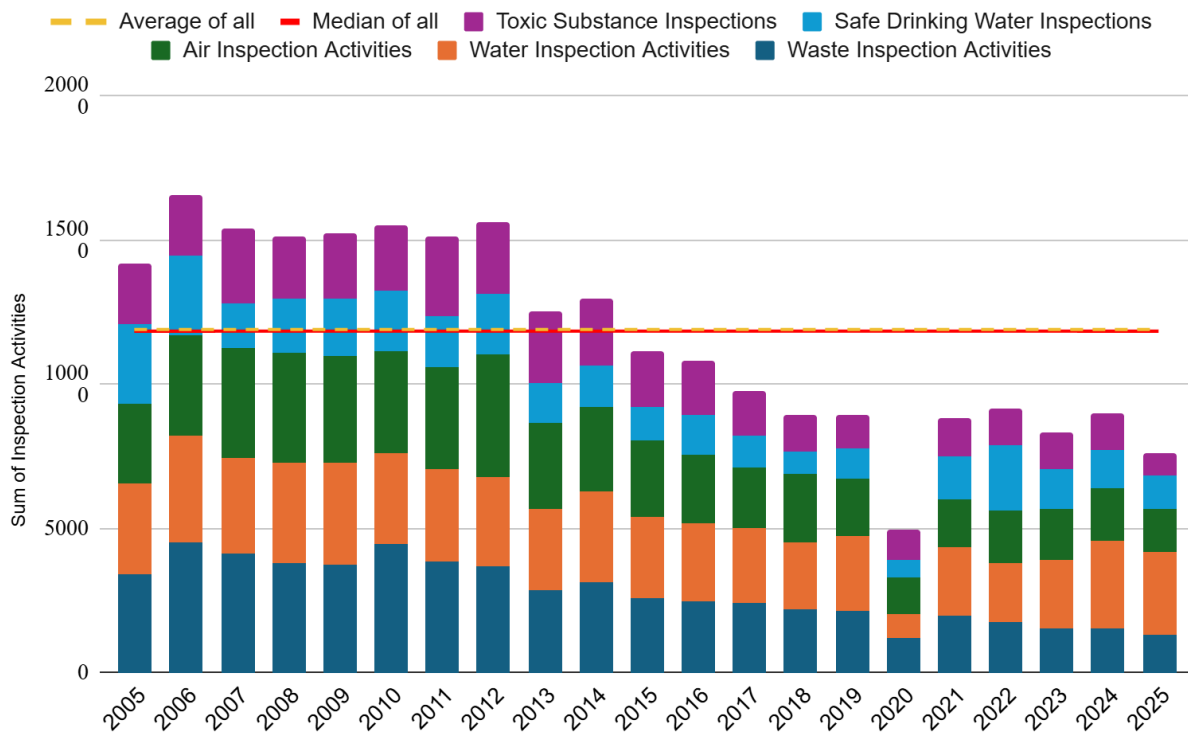


Figure 8. Annual Number of Summed Inspection Activities, 2005–2025. Summary tabulation of the major EPA inspection programs whose activities are documented in ECHO data. Note: Annual inspections and related activities tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

Air Inspection Activities

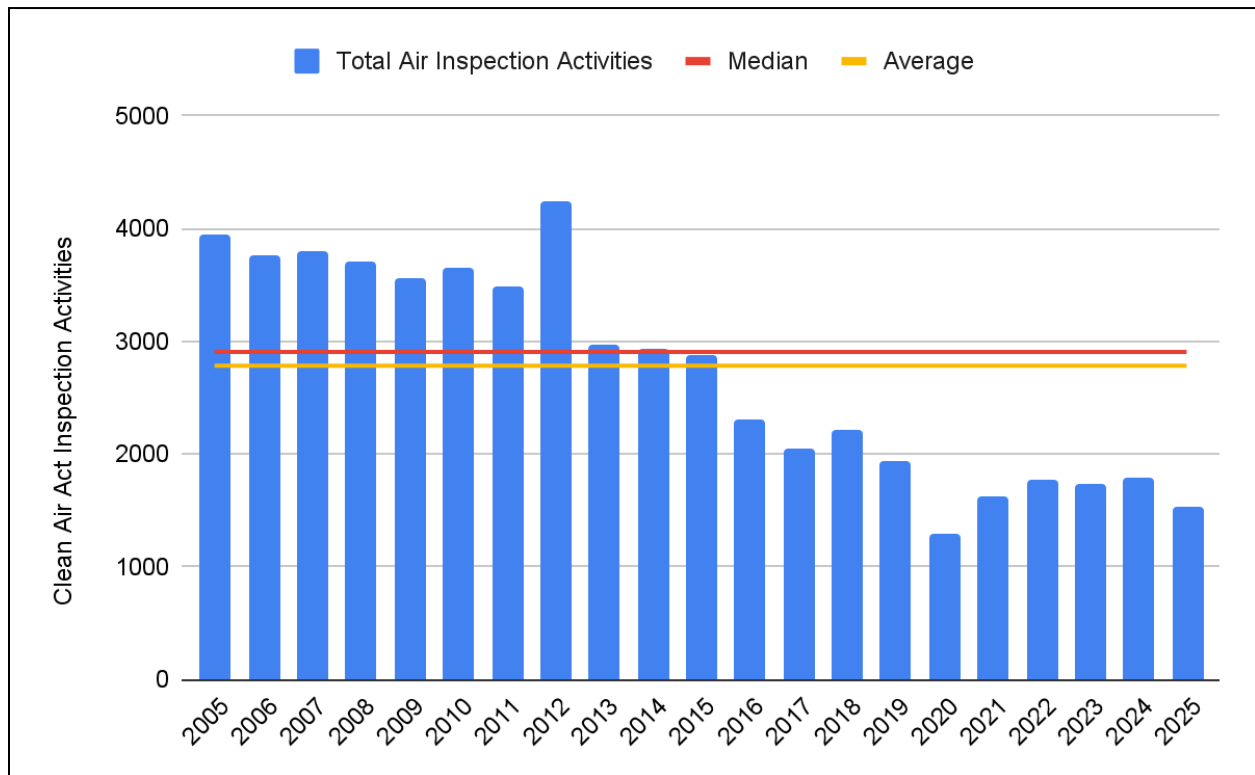


Figure 9. Annual Number of Clean Air Act Inspection Activities, 2005–2025. Note: Annual inspections tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

Total air inspection activities averaged 3,802 from 2005–2008 during the Bush administration and 3,739 from 2009–2012 during Obama’s first term. Total air inspections peaked in 2012 when 4,246 inspections were conducted (Figure 9). Total air inspections have been in decline since then. They reached their lowest point in 2020 (1,289), under the first Trump administration (during the COVID-19 epidemic) and then increased somewhat during the Biden administration, ranging from 1,633 to 1,789 per year. Between the 2012 peak and 2025, there has been a 63.9% decrease in total air inspections. Between 2005 and 2025 total air inspections have declined by 61.1 percent.

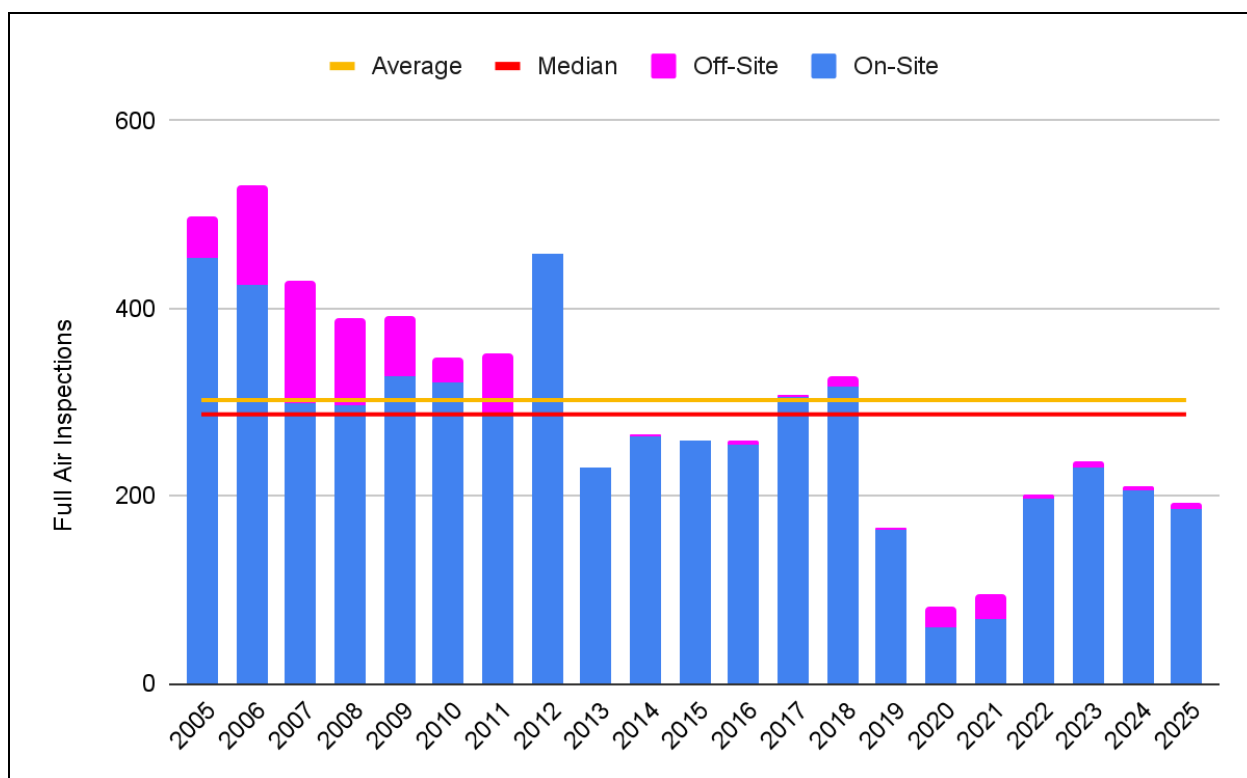


Figure 10. Annual Number of Full Air Inspections, On-Site and Off-Site, 2005–2025. Note: Annual inspections tracked from January 21 through November 30 each year; EPA terms these “compliance evaluations” but we have developed standard terminology consistent with that of other EPA programs. Source: From entries with PGM_SYS_ID_ICIS; search for ICIS-Air and air-related FE&C data in EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

Among EPA air inspections, those classified as “full,” or involving the most complete scrutiny of potential polluters were highest in 2005 (498) and 2006 (532) and have shown a long-term decline despite another peak in 2012 (Figure 10). The vast majority of full inspections are conducted through site visits to regulated facilities, though during the 2000s and again during COVID many were conducted offsite. Already decreasing toward the end of Trump’s first term, their numbers plummeted during the COVID-19 epidemic. After the Biden administration partially restored these inspections by 2023, they fell the next year from 238 to 211, and then another 9% under Trump 2.0 to 192. That figure is 58.1% below the 2012 spike and 63.9% below the 2006 peak.

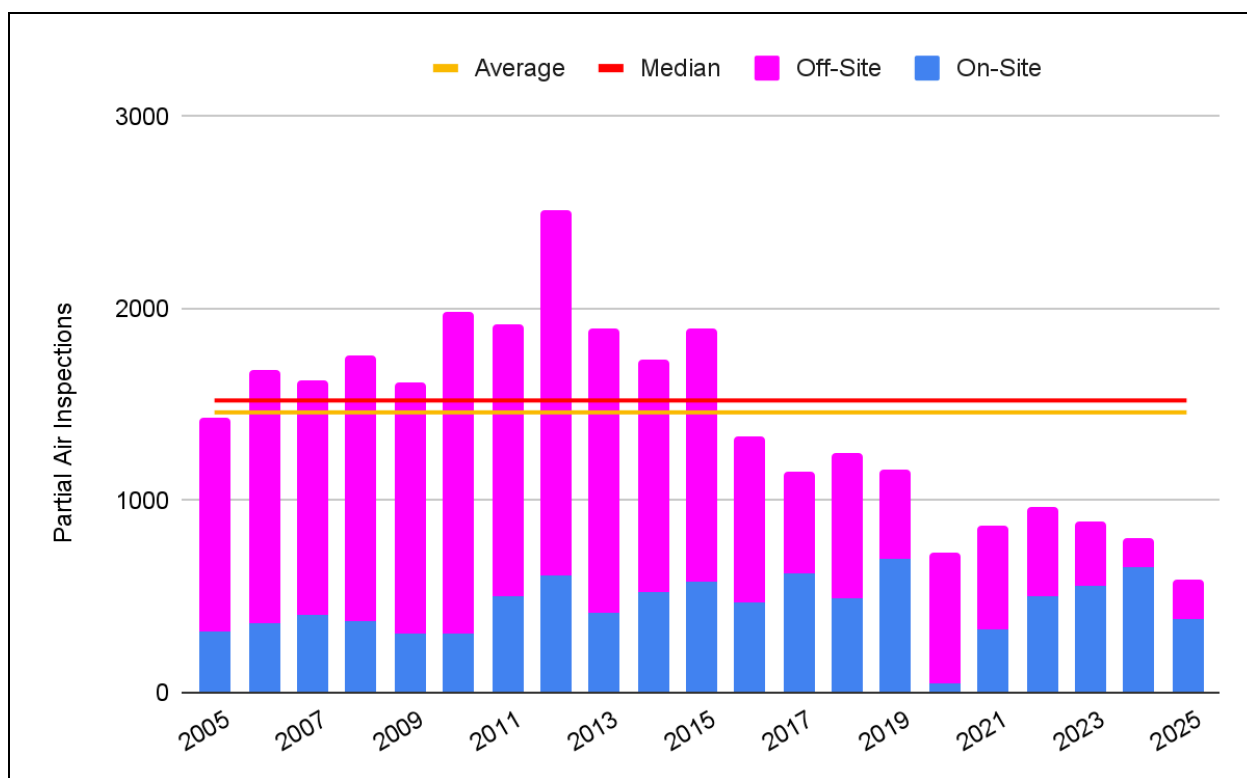


Figure 11. Annual Number of Partial Air Pollution Inspections, On-Site and Off-Site, 2005–2025. Note: Annual inspections tracked from January 21 through November 30 each year; EPA terms these “compliance evaluations” but we have developed standard terminology consistent with that of other EPA programs. Source: From entries with PGM_SYS_ID_ICIS; search for ICIS-Air and air-related FE&C data in EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

Partial Inspections, concentrating [only on a “subset”](#) of what a full inspection encompasses, constitute the great majority of inspections conducted under the Clean Air Act and have seen an equally dramatic decline over the past 20 years. After peaking at 2,509 in 2012 (Figure 11), they declined over the 2010s especially during Trump 1.0, punctuated by the shrinkage of on-site partial inspections to only 50 during the COVID-19 epidemic. Partial air inspections began to increase during the Biden administration to 864 in 2021 and 799 in 2024. In 2025 these inspections declined to 590, a 26% drop from 2024. There has been a 76.5% decline in partial inspections between 2012 and 2025 and a 58.6% drop since 2005.

Water Pollution Inspection Activities

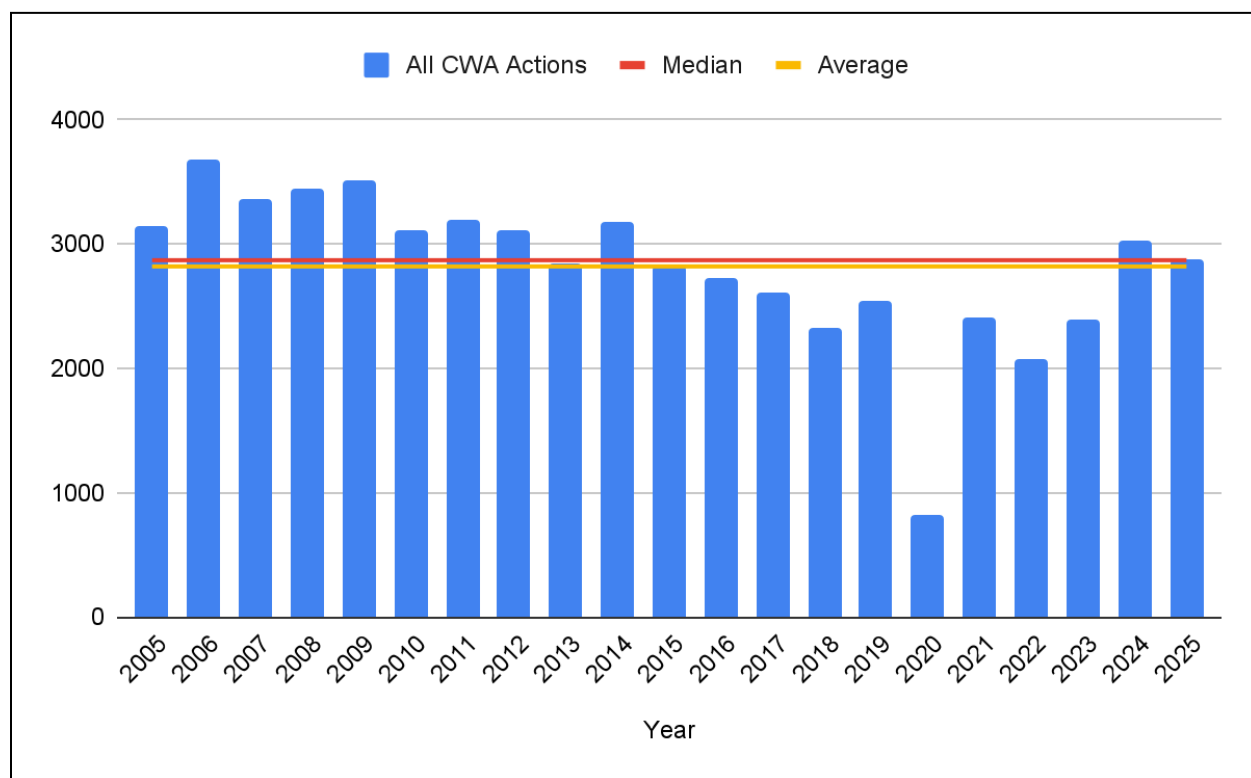


Figure 12. Annual Number of Clean Water Act (CWA) Inspection Activities, 2005–2025. Data combined from National Pollutant Discharge Elimination System (NPDES) and Federal Enforcement and Compliance (ICIS-FE&C) Systems. Note: Cases tracked from January 21 through November 30 each year. Source: EPA ECHO and ICIS accessed January 20, 2026; see EDGI data compilation linked [here](#).

With the exception of a sudden decline in 2020 during the COVID-19 epidemic, total inspection activities related to the CWA have remained fairly consistent, with a moderate decrease over time (Figure 12). Since in its last year the Biden administration returned clean water inspection activities to a level close to those of the G. W. Bush and Obama years, the number of clean water related inspections has remained the most stable of the three major programs (air, water, and waste).

Solid and Hazardous Waste Inspection Activities

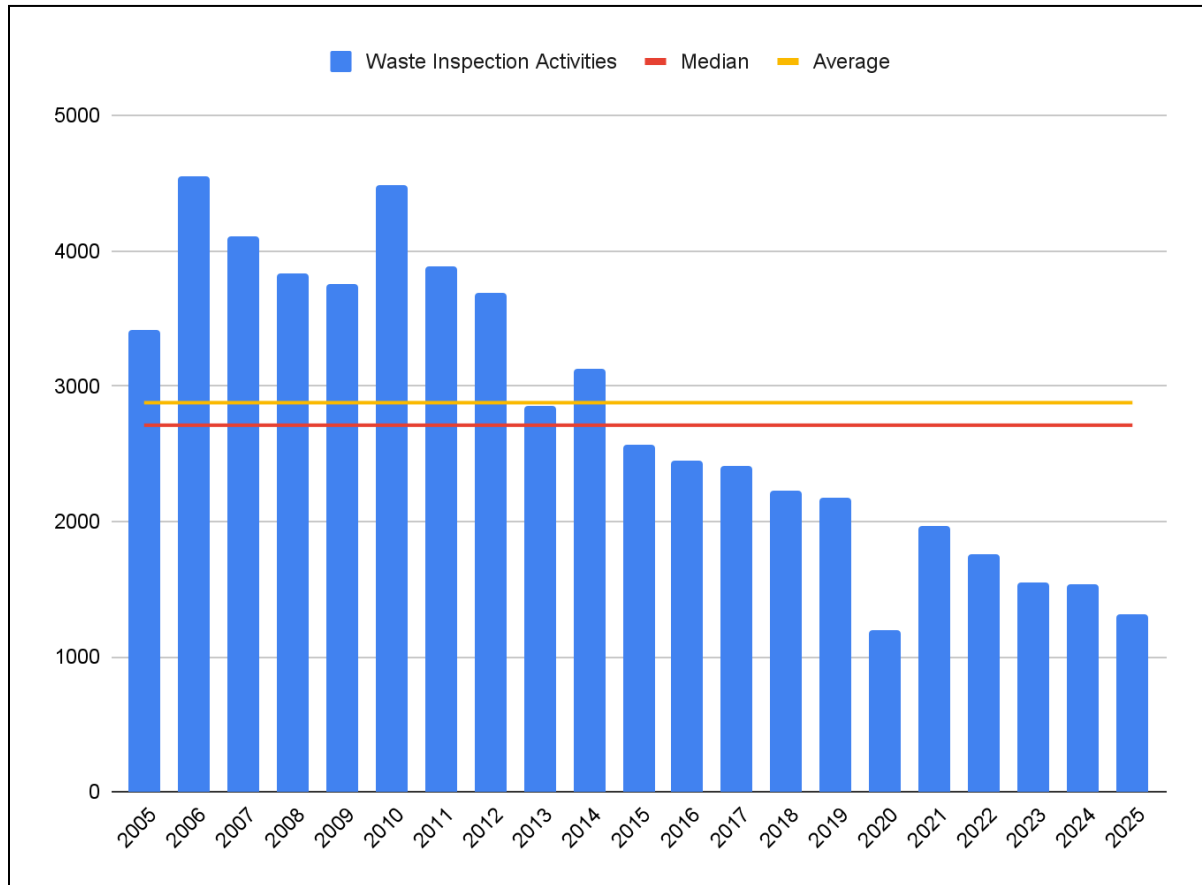


Figure 13. Annual Number of Solid and Hazardous Waste Inspection Activities, 2005–2025. Inspection activities authorized by the Resource Conservation and Recovery Act. Note: Annual inspections tracked from January 21 through November 30 each year. Source: From RCRAInfo and ICIS-FE&C systems in EPA ECHO, accessed January 20, 2026; see EDGI data compilation linked [here](#).

Generally, inspection activities for solid and hazardous waste have steadily declined over the 21st century, particularly since 2012 (Figure 13). Both the second G. W. Bush administration and Obama maintained averages of well over 3,000 RCRA inspections per year. Trump 1.0's average fell by over one-third to an average of just over 2,000 actions, culminating in the low of 1,200 during the 2020 COVID crisis (Figure 13). Biden was unable to recover to pre-2020 levels and the average over his administration was only 1,702 activities. The first year of the second Trump administration saw only 1,315 inspections, the lowest since 2005 for any given year excluding 2020.

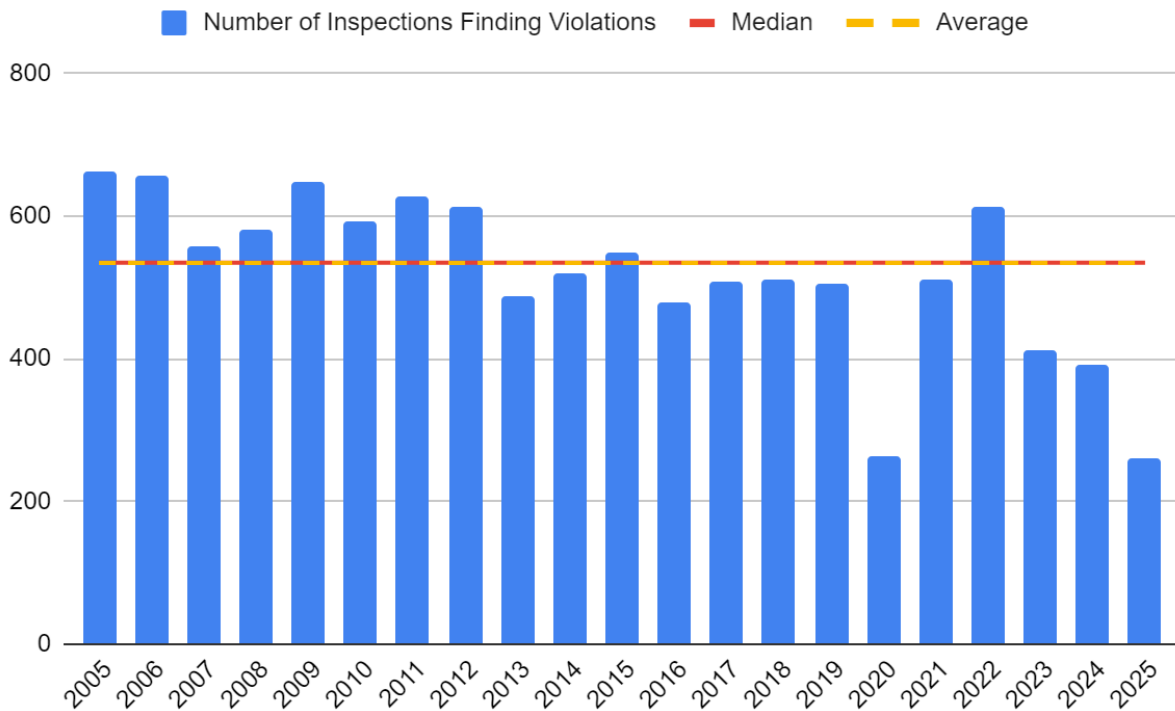


Figure 14. Number of Solid and Hazardous Waste Inspections Finding Violations Under the Resource Recovery and Conservation Act as Recorded in RCRAInfo, 2005-2025. Note: RCRAInfo is one of two EPA databases, along with ICIS FE&C, where RCRA inspection activities are recorded; annual inspections tracked from January 21 through November 30 each year. Source: From RCRAInfo in EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

The number of RCRA inspections finding violations each year, as recorded in EPA’s RCRAInfo database, have been more consistent over time and administrations. Generally, these numbers have ranged between 400 and 600 inspections with violations most years, with an average of about 521 over the period from 2005 to 2025. Multiple G.W. Bush and Obama years reached over 600, as did one Biden year (Figure 14). The number has only dipped below 400 three times—during the COVID crisis in 2020, again in 2024 under Biden, and in 2025 under Trump 2.0. As with the total number of RCRA activities, Trump 2.0 holds the record for lowest number of inspections finding violations found for any year or administration since 2005.

Other Inspections

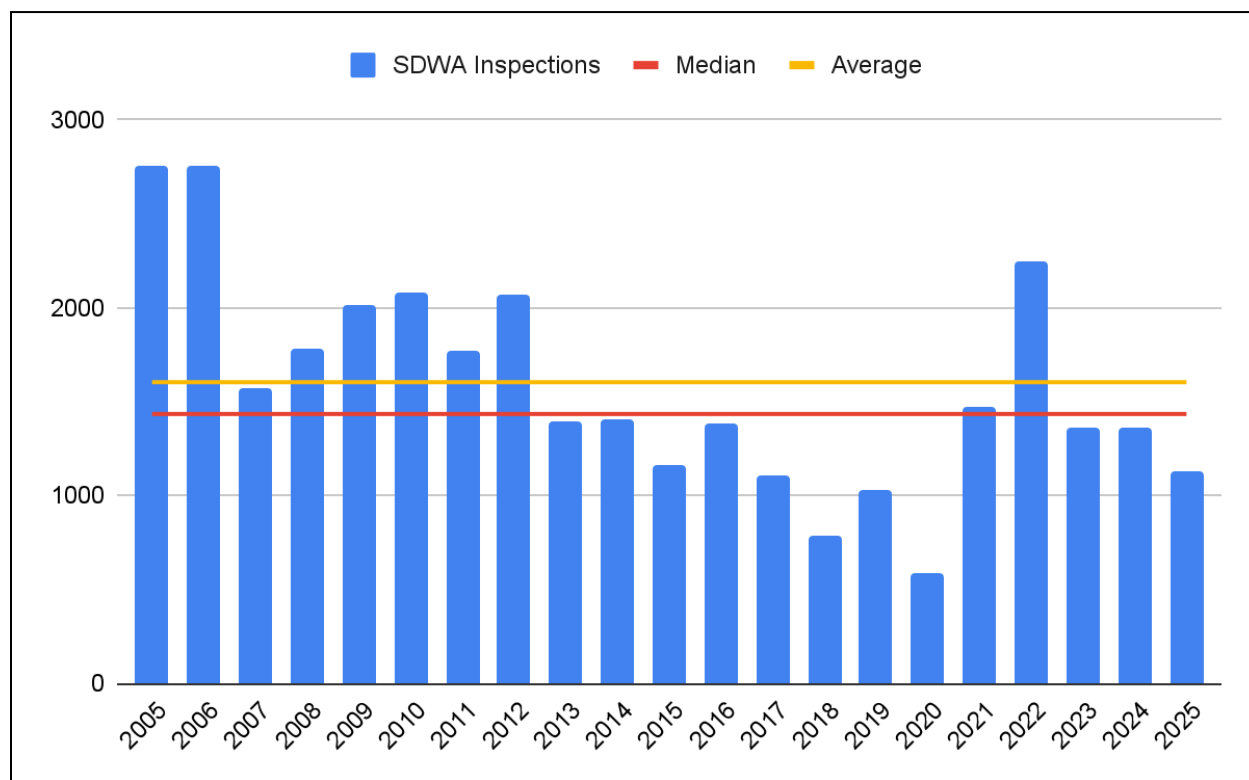


Figure 15. Annual Inspections Under the Safe Drinking Water Act (SDWA), 2005–2025. Note: Annual inspections tracked from January 21 through November 30 each year. Source: From ICIS-FE&C in EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

An examination of the number of annual inspections pertaining to the Safe Drinking Water Act (SDWA) from 2005 to 2025 (Figure 15) reveals that inspections related to the SDWA peaked in 2005 and 2006 at 2,756 for each of those years. In 2020 (during the COVID-19 epidemic), SDWA inspections reached the lowest point in this time frame, falling to 593 inspections. Trump’s first term saw some of the lowest counts of annual SDWA inspections, averaging about 877 per year. By comparison, during the Biden administration, SDWA inspections averaged 1,611 annually. Only two years saw fewer than 800 SDWA inspections per year (2018 and 2020), both occurring during Trump’s first administration. In this first year of the second Trump administration, there have been 1,128 SDWA inspections, down 29.98% from the average annual number of inspections under Biden, and down 17.48% compared to 2024.

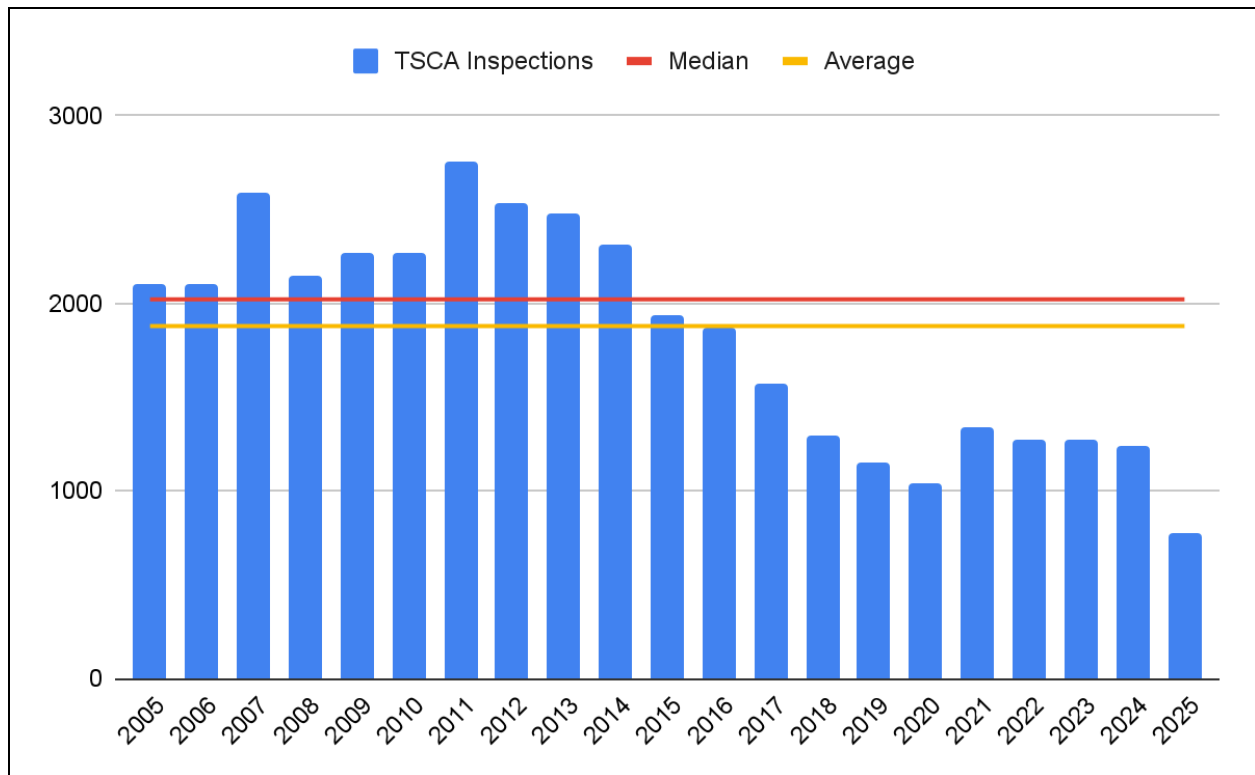


Figure 16. Annual Inspections Under the Toxic Substances Control Act (TSCA), 2005–2025. Note: Annual inspections tracked from January 21 through November 30 each year. Source: From ICIS-FE&C in EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

An examination of the number of annual inspections related to the Toxic Substances Control Act (TSCA) from 2005 to 2025 shows TSCA inspections peaked in 2011 at 2,761 and then generally declined each year through 2020 (Figure 16). TSCA is among those enforcement mandates that [EPA is forbidden from delegating](#) to the states, so when EPA doesn't enforce this law, no other agency can step in. While TSCA inspections increased slightly during the Biden administration, they hit a 20-year low of only 772 in the first year of Trump's second term. By comparison, during the Biden administration, TSCA inspections averaged 1,278 annually. TSCA annual inspections in 2025 are down 39.59% compared to the average annual inspections conducted during the Biden administration. They are also down 37.54% compared to 2024 (1,236 versus 772).

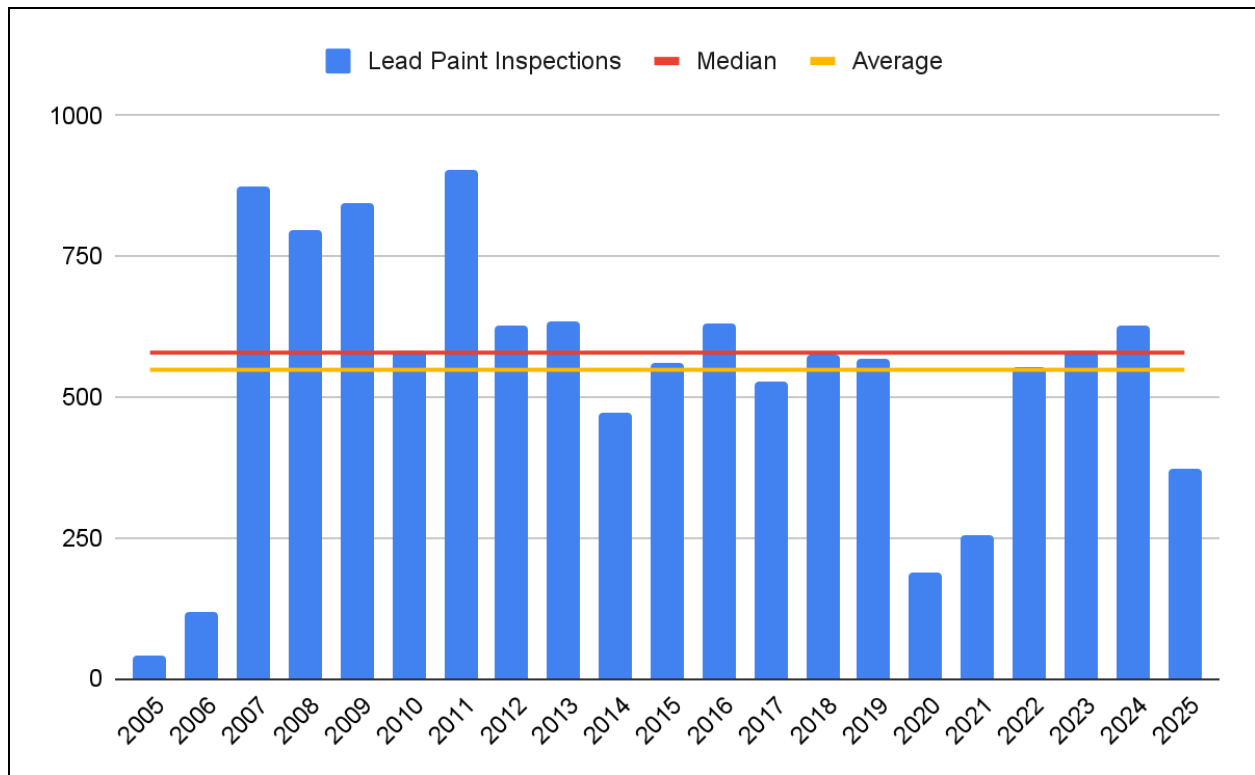


Figure 17. Annual Inspections for Lead Paint (a Subset of Those for Toxic Substances), 2005–2025. Note: Annual inspections tracked from January 21 through November 30 each year. Source: From ICIS-FE&C in EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

During the period of 2005–2025 lead paint inspections peaked in 2011 at 902 during the Obama administration (Figure 17). In 2020 and 2021 (during the COVID-19 epidemic) lead paint inspections were at their lowest levels since 2006, falling to 190 in 2020 and 256 in 2021. In 2022, annual lead paint inspections increased to nearly pre-pandemic levels and then continued to increase each year under the Biden administration to 629 in 2024. In 2025 annual lead paint inspections dropped to 374—a 40.54% decline from 2024.

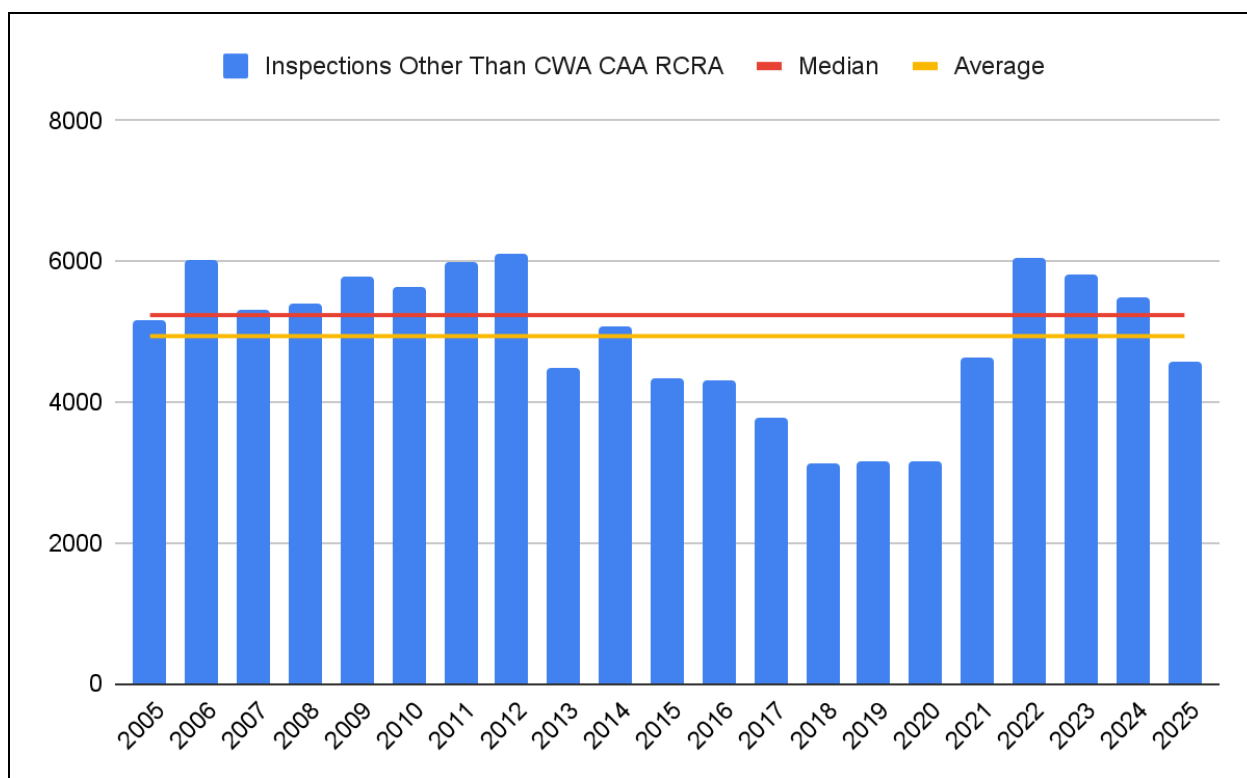


Figure 18. Annual Inspections Other Than for CWA, CAA, or RCRA, 2005–2025. This chart summarizes inspections for drinking water, toxic substances including lead paint, and other miscellaneous types (Figures 14-16). Note: Annual inspections tracked from January 21 through November 30 each year. Source: From ICIS-FE&C in EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

Among inspection activities EPA conducts in areas other than for the CWA, CAA, or RCRA, are those as for the Federal Insecticide, Fungicide, and Rodenticide Act and PCBs for example. From 2005 through 2025 (Figure 18), these types of inspections peaked during the Obama administration at 6,107 in 2012. While after 2012 there was a general decline in inspections for nearly a decade, 20-year lows came in Trump’s first term when annual inspections fell below 3,800 all four years. The average number of annual inspections during Trump’s first term was 3,307 inspections per year. During the Biden administration, the annual average rose to 5,491. Though total inspections in 2025 increased 38.46% from the average number during Trump’s first administration, they decreased 16.61% from the average under Biden. From 2024 to 2025, the number of inspections fell from 5,478 to 4,579—a 16.41% decline.

Broadly: Inspections for SDWA, TSCA, Lead Paint, and other (non CAA, CWA, RCRA) inspections all fell from 2024 to 2025 (Figures 15-18).

Cases

Civil Administrative Cases—Filed

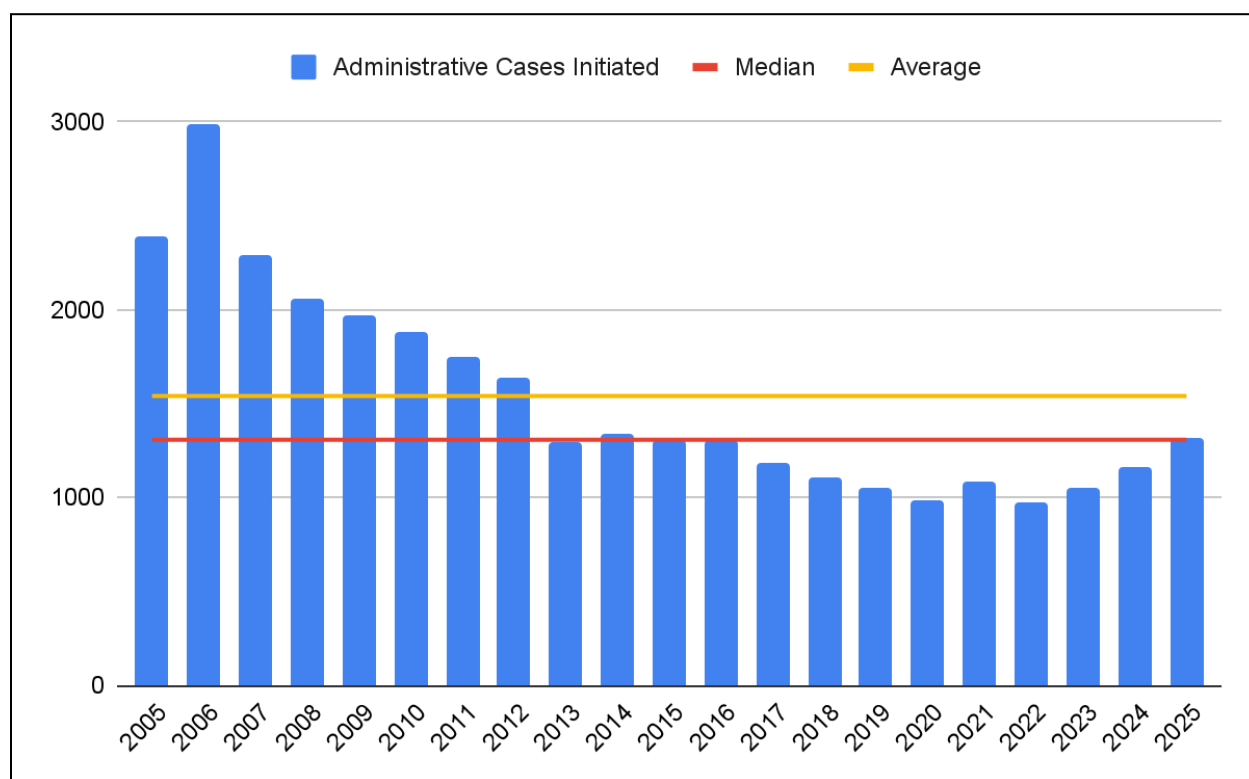


Figure 19. Annual Number of Civil Administrative Cases Filed by EPA, 2005–2025. Note: Cases tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

To understand the number of annual administrative civil cases filed by the EPA, we analyzed EPA ECHO data (Figure 19). These are cases that have been filed in a given year, without necessarily being concluded that year. From 2005 to 2025, the number of cases filed peaked in 2006 at 2,988 and then declined, twice dipping below 1,000 in 2020 (986 cases) and 2022 (978 cases). The number of cases filed has, however, increased every year for the past three years. In 2025, 1,319 cases were filed, which is the highest number of annual cases filed since 2014 (when 1,338 cases were filed).

Many of these initiated cases stemmed from inspection activities actually conducted the previous year under the Biden administration, which therefore deserves some credit for the continued rise in 2025. At the same time, declining inspection activities in 2025 point to a likely decline in cases initiated in 2026.

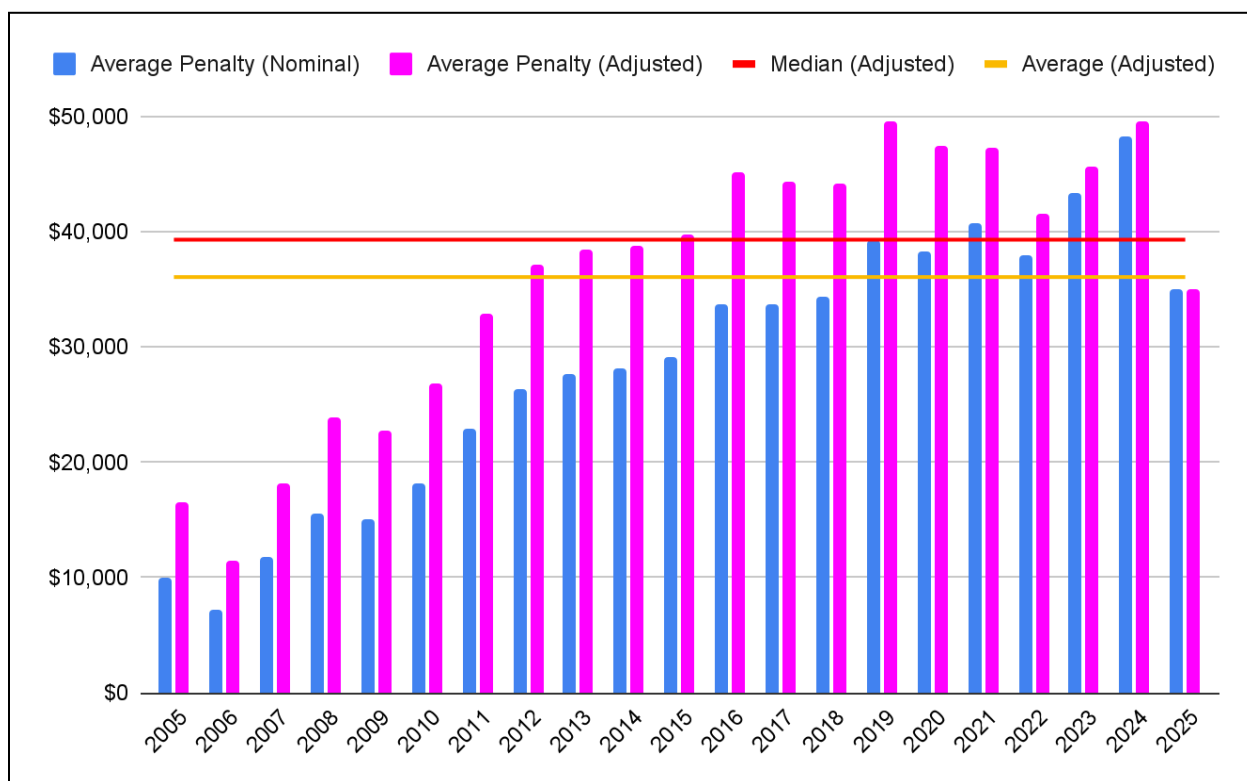


Figure 20. Average Annual Federal Penalty for Civil Administrative EPA Cases Filed, 2005–2025. Penalties are presented as both nominal and inflation-adjusted values (2025 dollars). Median and averages are presented for inflation-adjusted values only. Note: Cases tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

The average annual penalty for civil administrative EPA cases filed from 2005 to 2025 generally increased (Figure 20). Adjusting for inflation, the average annual federal penalty for civil administrative EPA cases peaked in 2019 at \$49,492.96. From 2024 to 2025, the average annual federal penalty, adjusted for inflation, declined from \$49,479.05 to \$35,042.79—a 29.18% decline. This drop represents the largest one-year decline in average annual federal penalties for civil administrative EPA cases in 20 years.

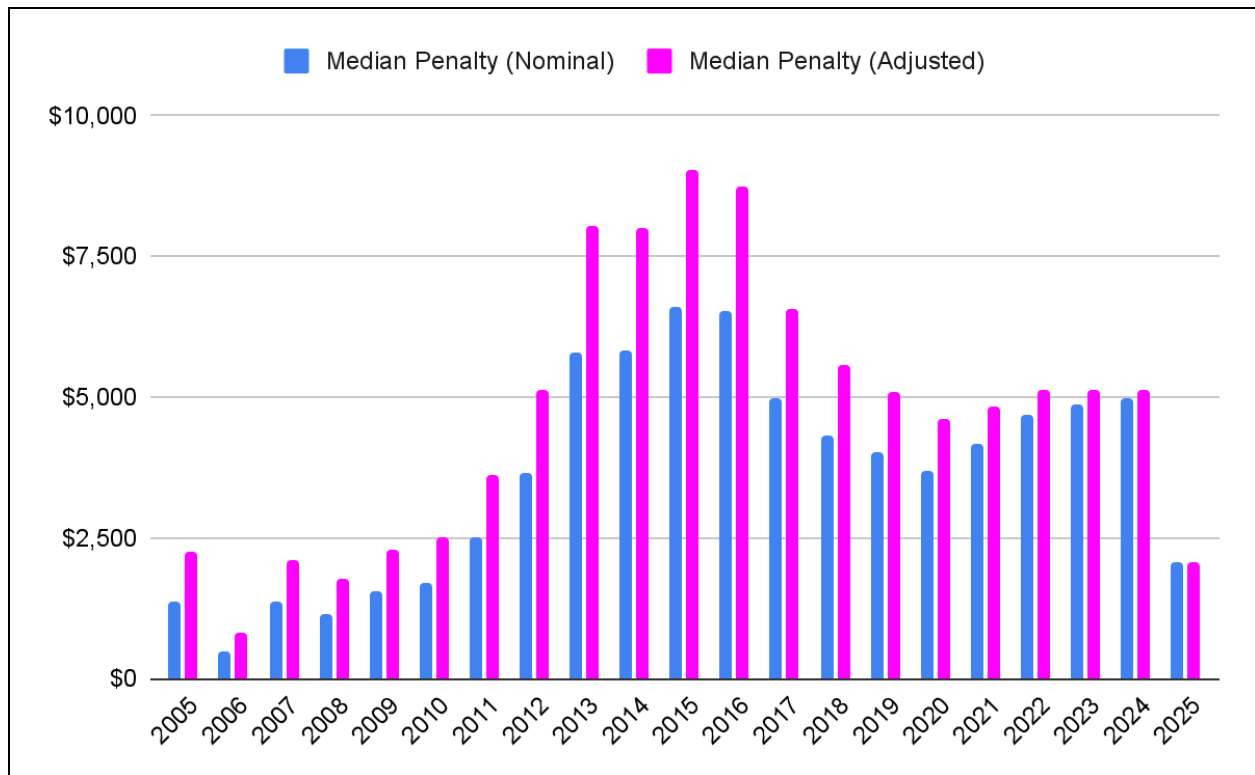


Figure 21. Median Annual Federal Penalty for Civil Administrative EPA Cases Filed, 2005–2025. Penalties are presented as both nominal and inflation-adjusted values (2025 dollars). *Note:* Cases tracked from January 21 through November 30 each year. *Source:* EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

Comparing *median* (Figure 21) with *average* (Figure 20) federal penalties for civil administrative EPA cases from 2005 to 2025 reveals more nuanced findings. First, median dollar amounts are much smaller than average penalty amounts: The largest median penalty occurred in 2015 and was \$6,600 (\$9,035.40 adjusted for inflation) compared to an average penalty in 2015 of \$29,043.84 (\$39,761.02 adjusted for inflation). The median penalty was its lowest in 2006 at \$500 (\$802.50 adjusted for inflation). There was a 58.25% drop in median penalty from 2024 (\$5,000) to 2025 (\$2,087.50)—the largest one year decline in 20 years.

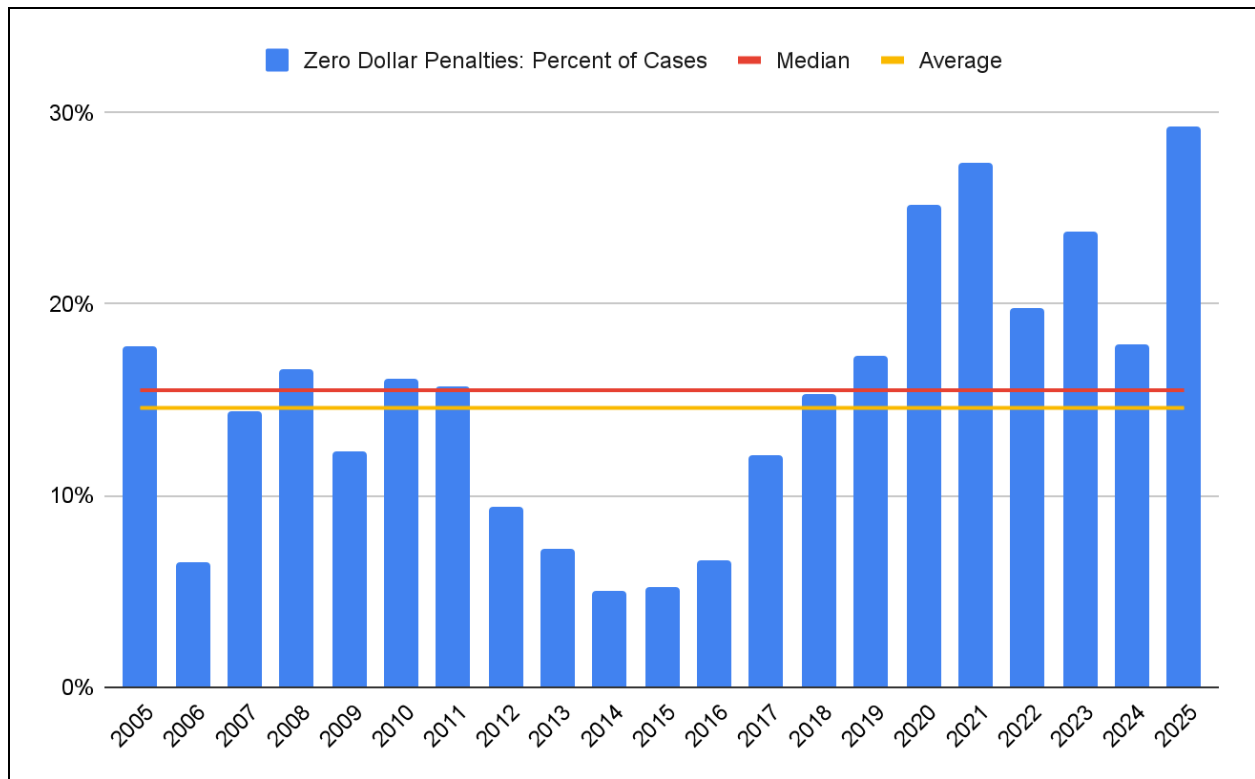


Figure 22. Percentage of EPA Administrative Cases Filed with Zero Dollars in Federal Penalties, 2005–2025. These figures only include cases that were both filed and settled in a given year. Note: Cases tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

The percentage of administrative cases concluding in zero dollars in federal penalties provides some indication of the seriousness with which an administration regards environmental violations. The percentage of cases with zero dollars in federal penalties grew every year during Trump’s first administration (2017 through 2020), reaching 25.23% in 2020 (Figure 22). The percentage of cases resulting in zero dollars in penalties fluctuated annually under Biden, ranging from 27.33% in 2021 to 17.91% in 2024. The first year of Trump’s second term (2025) saw the highest annual percentage (29.24%) of cases with zero dollars in federal penalties in 20 years.

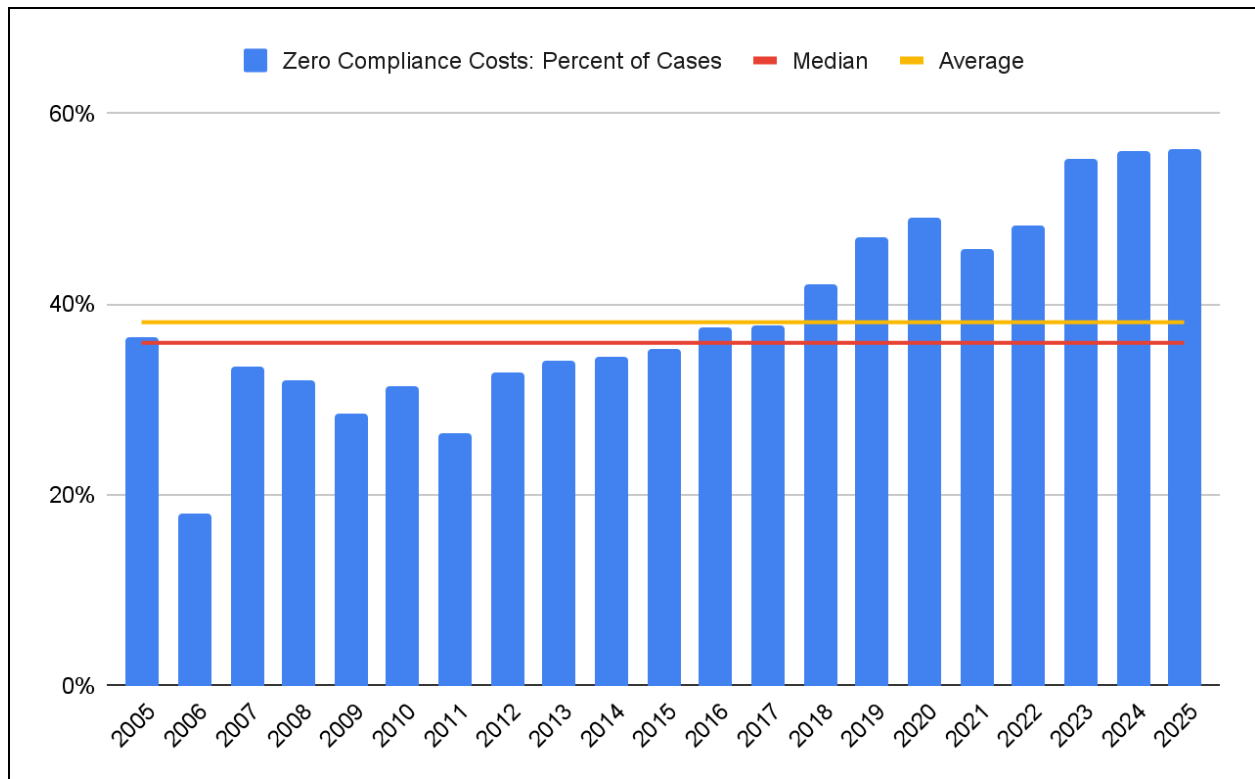


Figure 23. Percentage of EPA Administrative Cases Filed with Zero Dollars in Compliance Costs, 2005–2025. These figures only include cases that were both filed and settled in a given year. Note: Cases tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

Examining the annual percentage of filed administrative cases concluding in zero dollars in compliance costs indicates settlements that require no expenditures by those charged to bring facilities into compliance with environmental laws. Since 2012, the percentage of cases with zero dollars assessed in compliance costs has generally increased (Figure 23). In 2025, 56.34% of cases resulted in zero dollars in compliance costs, the highest annual percentage in 20 years. That said, for each of the last three years (2023–2025) over half of all EPA administrative cases filed annually have incurred zero dollars in compliance costs.

Civil Administrative Cases—Concluded

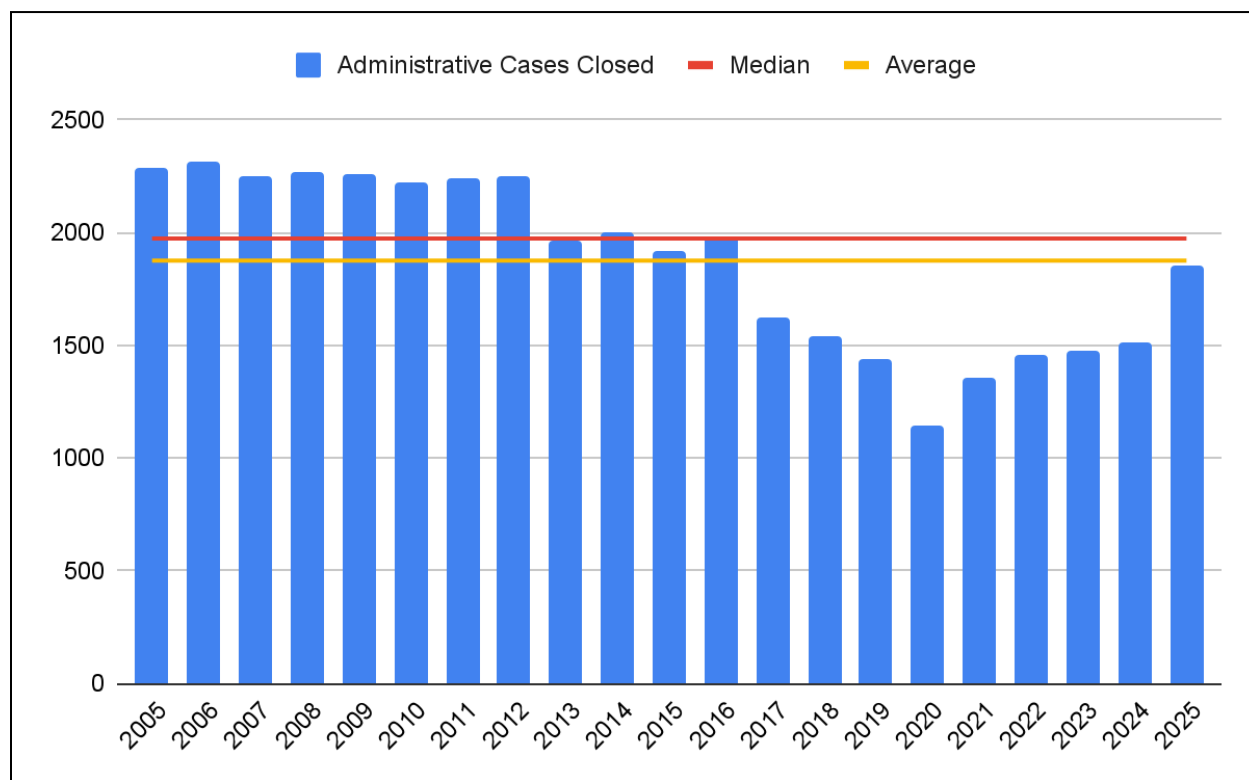


Figure 24. Annual Number of EPA Administrative Cases Concluded, 2005–2025. Compared to “cases filed,” more of these cases began in the Biden years. Note: Cases tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

An examination of EPA’s ECHO data also shows the number of administrative cases concluded annually from 2005 through 2025 (Figure 24). Unlike the entries for administrative cases *filed*, these figures include cases that may have begun earlier than the year of conclusion. Many concluding in 2025 started with inspections accomplished by the Biden EPA, which should share the credit for that year’s rise. Over the twenty years under study, the number of concluded administrative cases peaked in 2006 at 2,313. These cases decreased each year during Trump’s first term, falling from 1,621 in 2017 to 1,143 in 2020 and increased each year of the Biden administration, from 1,355 in 2021 to 1,517 in 2024. In the first year of Trump’s second term, the number of closed administrative cases increased to 1,854—the highest number since 2016.

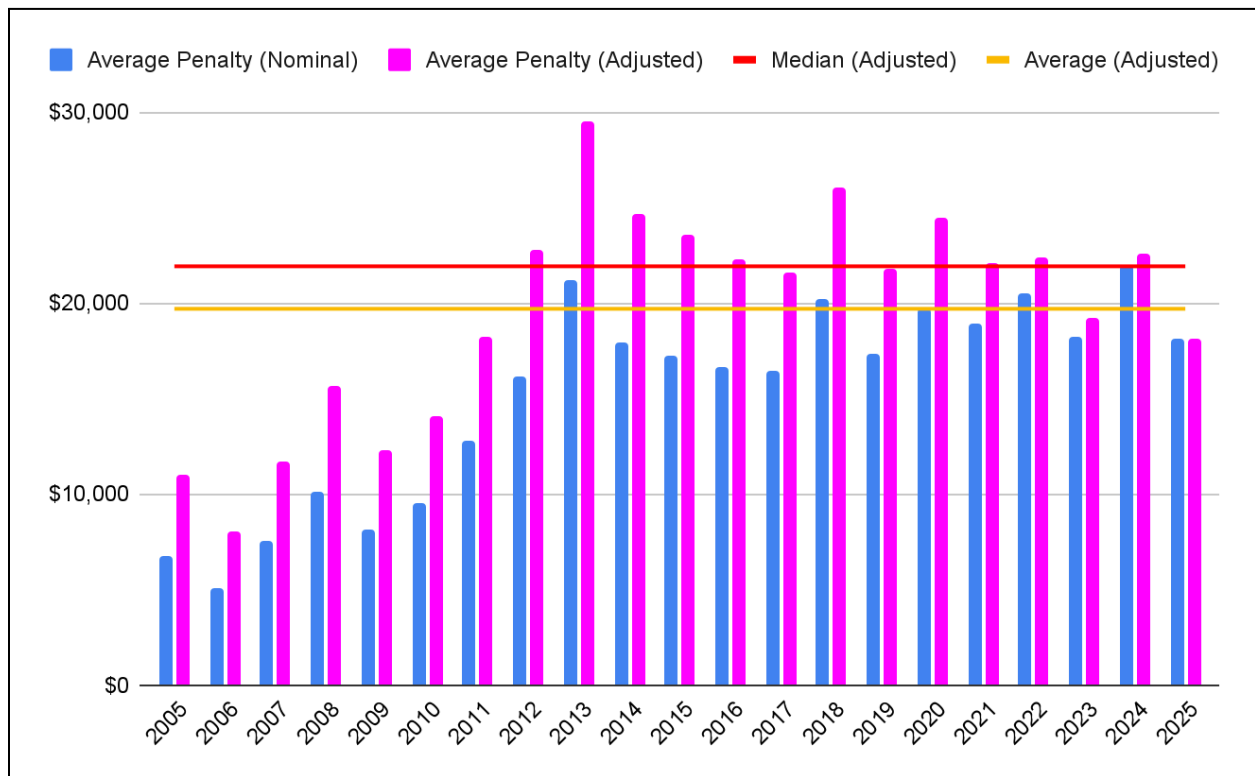


Figure 25. Average Annual Federal Penalty for Civil Administrative EPA Cases Concluded, 2005–2025. Penalties are presented as both nominal and inflation-adjusted values (2025 dollars). Median and averages are presented for inflation-adjusted values only. Note: Cases tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

Next, we examined the average annual penalty for civil administrative EPA cases concluded from 2005 to 2025 (Figure 25). Adjusting for inflation, the average annual federal penalty for civil administrative EPA cases peaked during the Obama administration in 2013 at \$29,474.07. After that, average penalties generally plateaued or declined. From 2024 to 2025, the average annual federal penalty adjusted for inflation declined by 19.52% from \$22,542.54 to \$18,141.70.

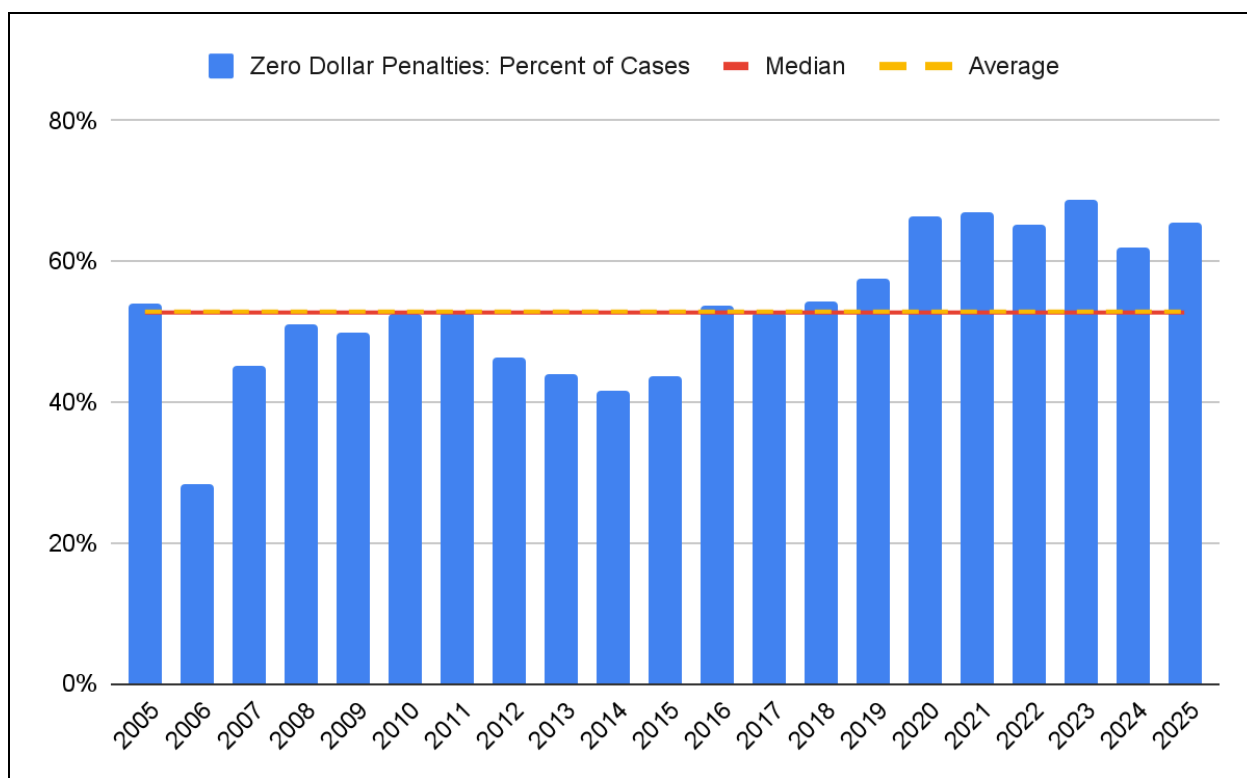


Figure 26. Percentage of EPA Administrative Cases Concluded with Zero Dollars in Federal Penalties, 2005–2025. These figures only include cases that were settled in a given year. Note: Cases tracked from January 21 through November 30 per year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

An examination of the percentage of concluded administrative cases resulting in zero dollars in federal penalties, from 2005-2025, shows that this percentage grew from 52.76% in 2017 to 66.42% in 2020 during Trump’s first administration (Figure 26). During the Biden administration, the annual percentages were similar, ranging from 65.36% to 68.89% from 2020 to 2023, before dropping to 62.09% in 2024. The percentage of EPA administrative cases concluded with zero dollars in federal penalties increased to 65.41% in 2025.

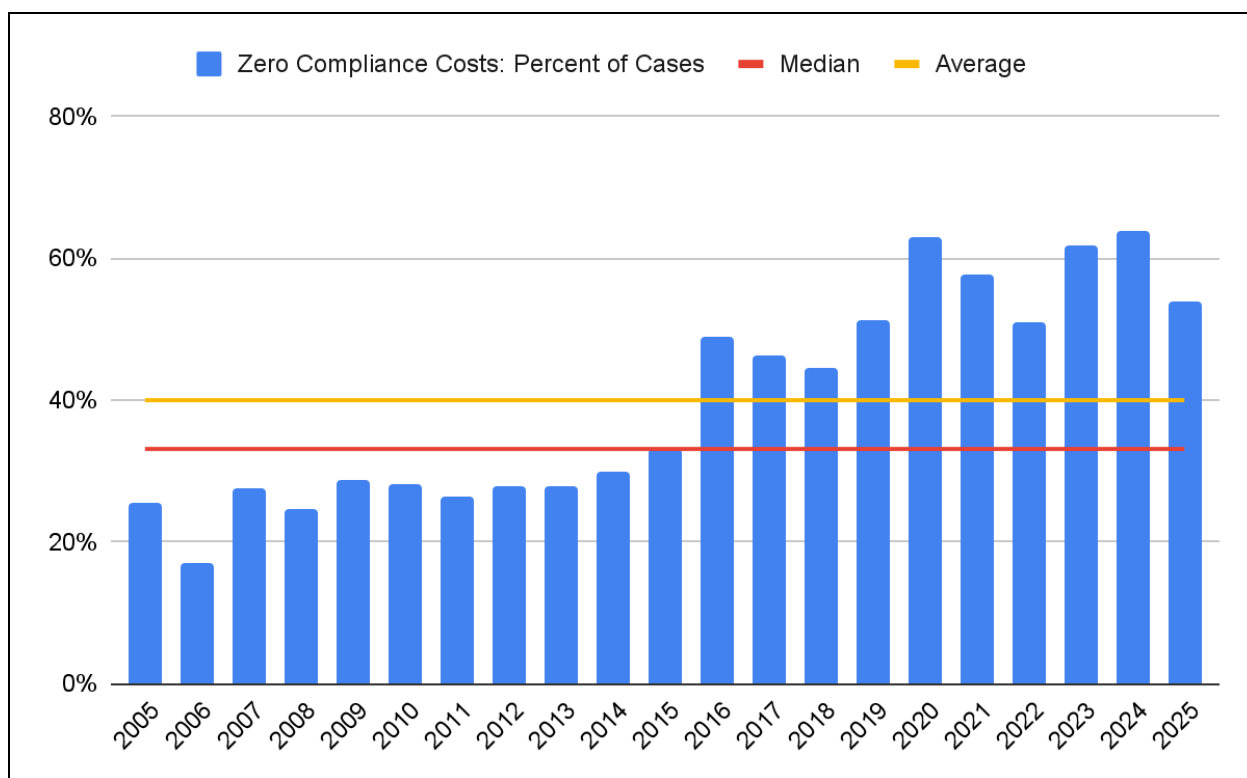


Figure 27. Percentage of EPA Administrative Cases Concluded with Zero Dollars in Compliance Costs, 2005–2025. These figures only include cases that were settled in a given year. Note: Cases tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

Finally, an examination of the percentage of administrative cases concluding in zero dollars in compliance costs showed a general increase annually from 2005 to 2025 (Figure 27). In 2005, only about one in four cases concluded with zero dollars in compliance costs, but in 2025 that figure increased to more than one in two. For each year since 2019, at least half of all administrative cases concluded with zero dollars in compliance costs. In 2024, 63.92% cases concluded with zero dollars in compliance costs, decreasing to 53.87% in 2025.

Civil Judicial Cases—Filed

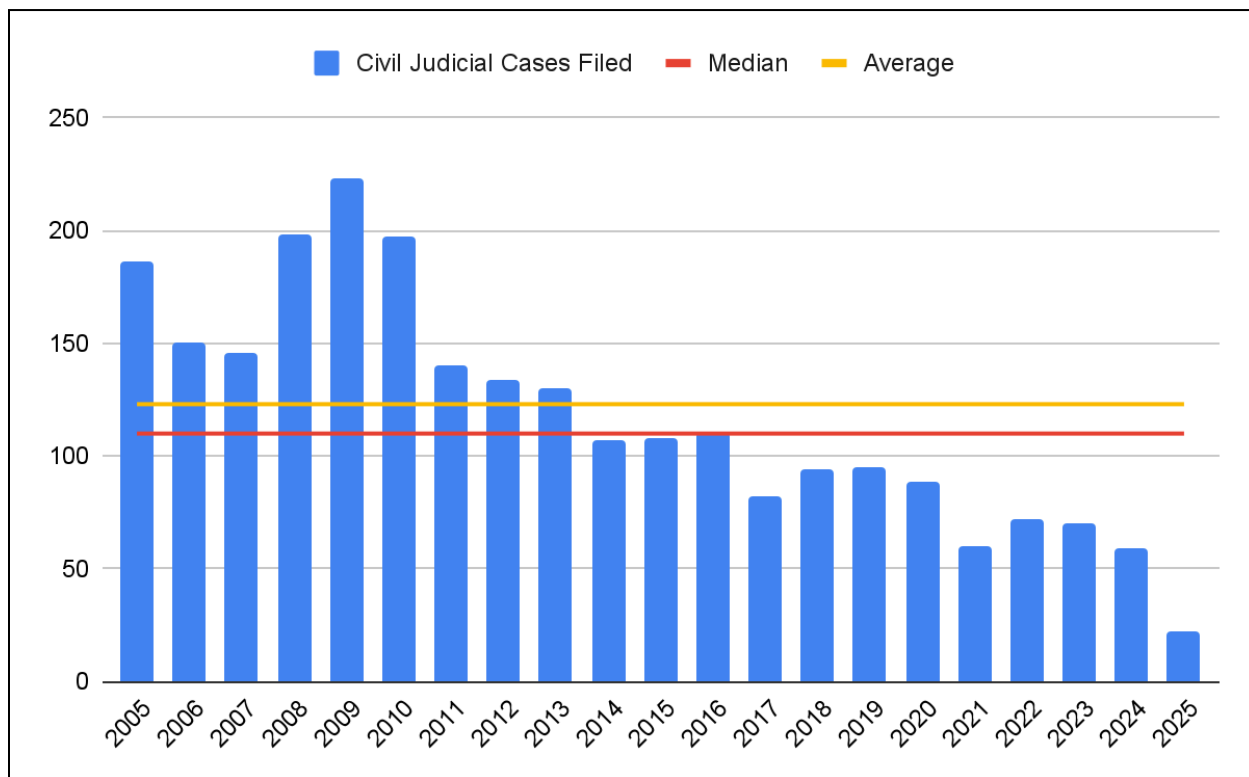


Figure 28. Annual Number of EPA Civil Judicial Cases Filed, 2005–2025. Note: Cases tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 21, 2026; see EDGI data compilation linked [here](#).

We also examined the EPA's ECHO data to determine the number of civil judicial cases filed annually from 2005 through 2025, during which time cases filed peaked in 2009 at 223 (Figure 28). Generally, the number of civil judicial cases filed has trended downward each year since. In 2025, these cases reached a twenty year low of only 22. This is a 62.71% decrease from 2024 (59 cases), a 64.25% decrease from the average during the Biden administration, and a 75.56% decrease from the average during the first Trump administration.

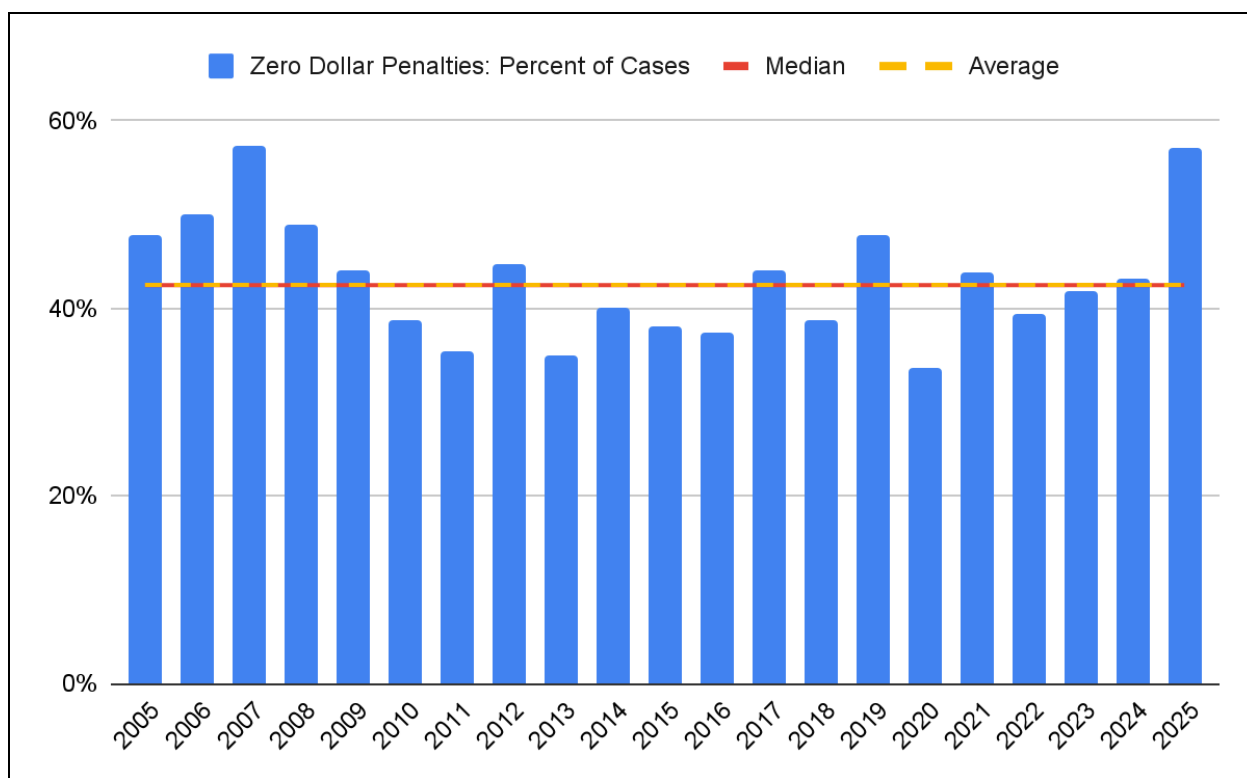


Figure 29. Percentage of EPA Civil Judicial Cases Filed with Zero Dollars in Federal Penalties, 2005–2025. These figures only include cases that were both filed then settled in a given year. Note: Cases tracked from January 21 through November 30 each year. Source: EPA ECHO accessed January 21, 2026; see EDGI data compilation linked [here](#).

Next we examined the percentage of filed civil judicial cases associated with zero dollars in federal penalties (Figure 29) from 2005 to 2025, during which the lowest annual percentage occurred in 2020 (33.7%). From 2024 to 2025, the percentage of civil judicial cases filed with zero dollars in federal penalties increased from 43.14% to 57.14%—the highest annual percentage in the 20-year time frame.

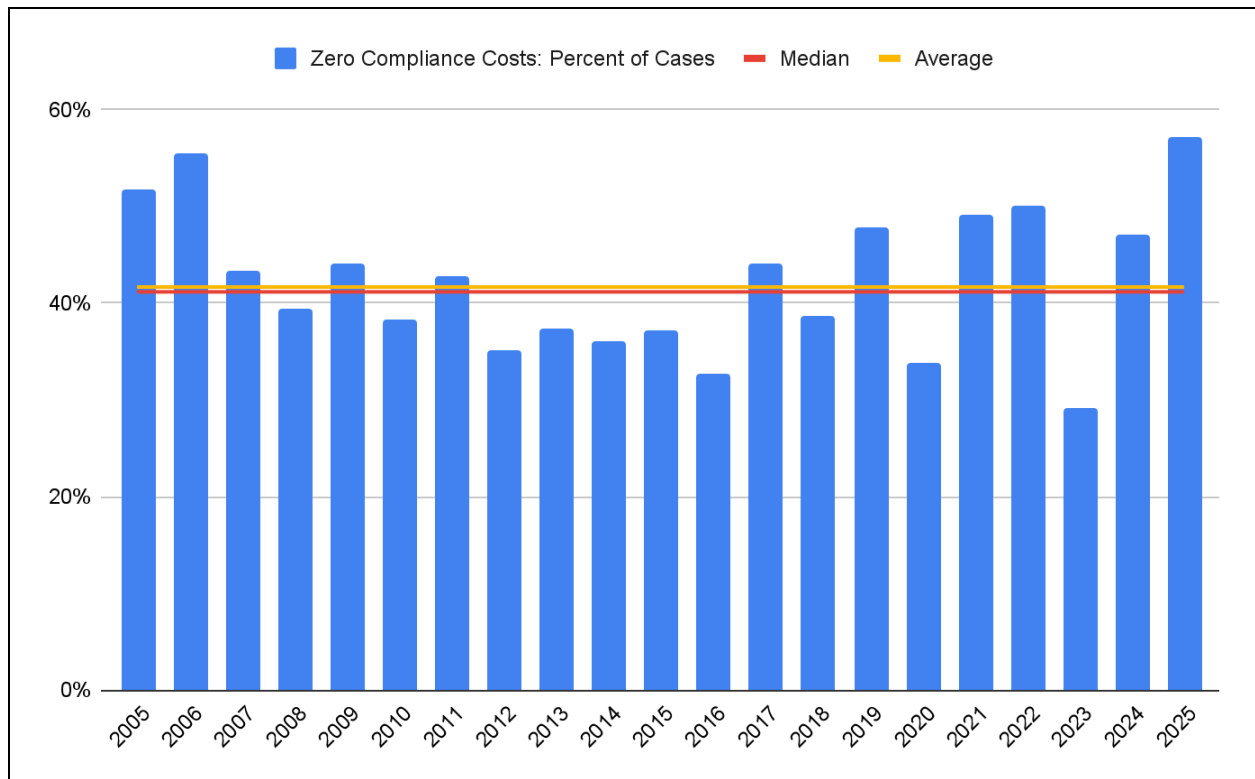


Figure 30. Percentage of EPA Civil Judicial Cases Filed with Zero Dollars in Compliance Costs, 2005–2025. These figures only include cases that were both filed and settled in a given year. Note: Cases tracked from January 21 through November 30 per year. Source: EPA ECHO accessed January 21, 2026; see EDGI data compilation linked [here](#).

Finally, we examined the percentage of civil judicial cases filed that were associated with zero dollars in compliance costs (Figure 30). Annual percentage of such cases hit a 20-year low in 2023 (29.1%) under the Biden administration. By comparison, the percentage of civil judicial cases filed with zero dollars in compliance costs reached 57.14% in the first year of Trump’s second term—a 20-year high.

Civil Judicial Cases—Concluded

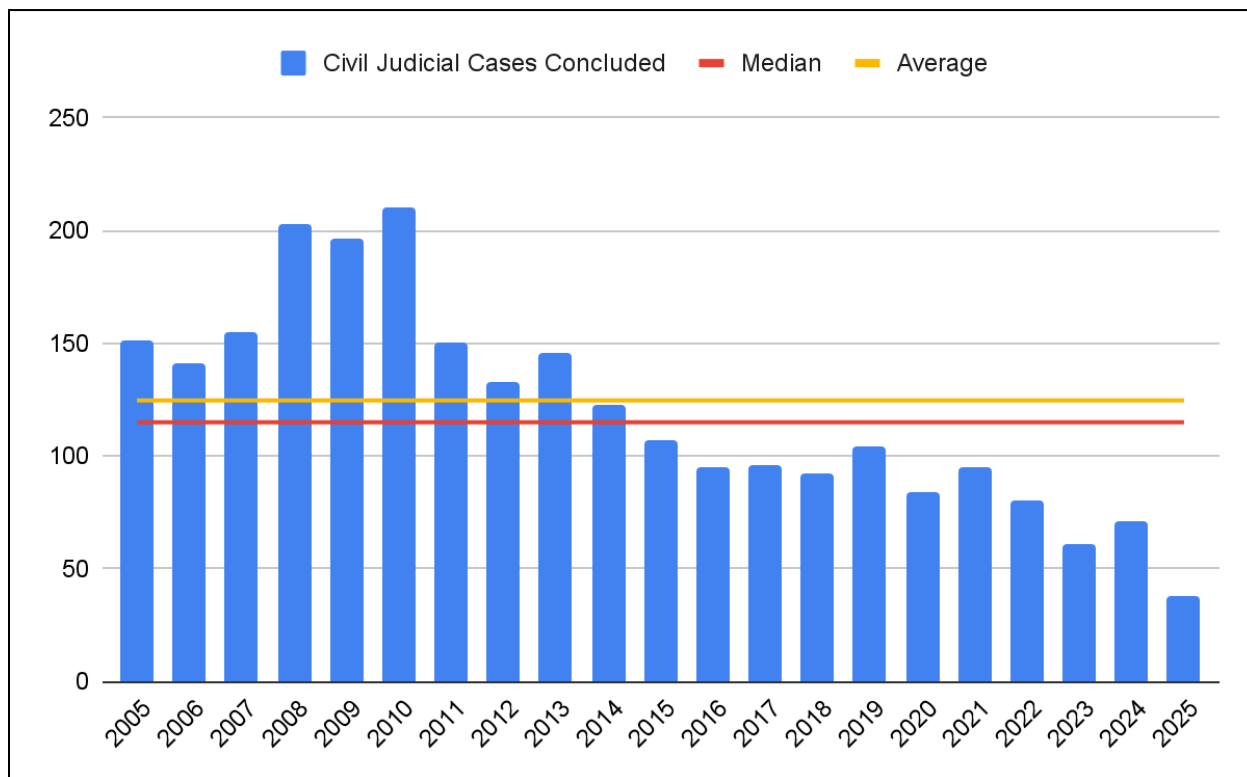


Figure 31. Annual Number of EPA Civil Judicial Cases Concluded, 2005–2025, with Median and Average Number of Cases for 2005–2024. *Note:* Cases tracked from January 21 through November 30 each year. *Source:* EPA ECHO accessed January 20, 2026; see EDGI data compilation linked [here](#).

We examined the EPA’s ECHO data to determine the number of civil judicial cases concluded annually from 2005 through 2025 (Figure 31). (We counted concluded cases as those categorized as “Final Order Entered,” “Concluded,” or “Closed” in ECHO data). In 2025, there were 38 concluded civil judicial cases. This was 46% lower than the previous year (71 cases), and 60% lower than Biden’s first year (95 cases). It was 50% lower than the average for the Biden administration and 60% lower than the average for the first Trump administration.

Judicial cases concluded have never been lower in the past 20 years. The peak since 2005 was in 2010 during the Obama administration (210 cases), followed closely by George W. Bush’s final year in 2008 when there were 203 cases. First years in office are no barrier to high case conclusions, as demonstrated by Obama’s first year in office in 2009, when there were 196 judicial case conclusions.

Judicial case conclusions have trended downward since the late Bush and early Obama administrations, but 2025 is a historic low. The next lowest year, 2023, had 61 cases. Between 2005 and 2024, the average number of judicial case conclusions was 125 and the median was 115. The current year is 70% lower than this historic average and 67% lower than the historic median.

Conclusion

Not so surprisingly, the first year of the EPA under the second Trump administration brought significant diminution in many of the agency's federally mandated enforcement activities. Compared to the Biden years, the agency has taken an ever lighter approach to potential polluters, shrinking its oversight, lessening or abandoning its penalties, and largely retreating from courtrooms. Since inspection activities are how EPA finds violations, their slackening over 2025 does not bode well for the vigor of EPA enforcement both over the coming year and beyond. Perhaps if the current EPA ever makes data on its criminal prosecutions available, evidence will demonstrate a more forceful hand at least against some polluters. But most of the evidence now available shows Trump's EPA adopting a soft touch.

Trump's EPA of 2025 is taking another step downhill along the same descending road that EPA enforcement has been traveling over the last decade and more. From the second G. W. Bush and first Obama administrations, the high point of EPA inspection activities over the last 20 years, the agency's oversight has diminished across nearly every category measured. Trump 1.0 played a role, COVID proved devastating, and the Biden administration proved unable to recover in most measured parameters before a new enforcement-averse Trump administration took over. Certainly, as well, the administration's slashing of staff numbers at the EPA may also play a role. With about a [third fewer staff](#), keeping up previous enforcement metrics would prove difficult in the best of situations.

The Trump 2.0 EPA seems determined to fully restore a freedom to pollute that is utterly contrary to the spirit as well the letter of our nation's environmental laws. As Richard Nixon put it back in 1970: "[B]y ignoring environmental costs we have given an economic advantage to the careless polluter over his more conscientious rival." And it may well take a revival of the "greatness" of pollution in that time for our own leaders to come to the realization of "how precious and how vulnerable our resources of land, water and air really are."