

Environmental Rulemaking

Experience

- Developed extensive public comments on U.S. EPA's proposed "Interpretive Statement on Application of the Clean Water Act National Pollutant Discharge Elimination System Program to Releases of Pollutants from a Point Source to Groundwater."
- Developed extensive public comments on U.S. EPA's proposed "Reconsideration of Supplemental Finding and Residual Risk and Technology Review" of the Mercury Air Toxics Standards (MATS) for coal-fired power plants.
- Advised and assisted a client in a successful petition to U.S. EPA for approval to use an Alternate Test Method for fugitive opacity measurements in lieu of unproven digital camera system.
- Appealed U.S. EPA's national emission standard for hazardous air pollutants (NESHAP) for the ferroalloys industry based on "maximum achievable control technology (MACT) standards to the U.S. Circuit Court of Appeals for the DC Circuit, resulting in the promulgation of revised standards proposed by the client.
- Represented a ferroalloys producer with respect to U.S. EPA's development of proposed "residual risk" NESHAP, including negotiations with U.S. EPA during data collection, rule development, and appeal to the DC Circuit.