

REGULATORY MATTERS WE'VE PARTICIPATED IN

- EPA Post-2010 HCFC production rights allocation rule;
- EPA “pre-charged products” rule;
- Drafted model mercury emission control rule for coal-fired power plants for organizations of state and local air pollution control officials;
- Advised state of Illinois Environmental Protection Agency and participated in hearings before the Illinois Pollution Control Board regarding mercury emission limitations for coal fired power plants in Illinois;
- Creation of industry-wide PAL program as alternative to NSR;
- Various EPA "MACT" rulemakings, including "boiler MACT;"
- EPA HCFC production rights allocation rule;
- EPA “SNAP” proceeding regarding substitutes for certain HCFCs;
- EPA “small refiner” regulations;
- EPA Open Market Trading Guidance;
- Proposed EPA regulation to allow emission offsets among “hazardous air pollutants” under §112(g) of the Clean Air Act;
- EPA “hazardous air pollutant” standards for oil refineries;
- EPA regulations on reformulated gasoline;
- EPA Title V permit regulations;
- EPA revision of National Ambient Air Quality Standards for ozone “smog;"

- EPA monitoring methodology for measuring emissions of sulfur oxides;
- EPA “noncompliance penalty” regulations;
- EPA revision of National Ambient Air Quality Standards for particulate matter to cover “fine particulates;”
- EPA New Source Performance Standards for steam electric power plants;
- EPA rules (and later revisions) on stack height;
- EPA rules on Prevention of Significant Deterioration;
- EPA revision of National Secondary Ambient Air Quality Standard for sulfur oxides;
- EPA review and approval of State Implementation Plans for all 50 States and Puerto Rico under 1970 Clean Air Amendments;
- Involved in many of major federal rulemakings and other regulatory proceedings under the Clean Air Act and other statutes;