



CHRIS S. LEASON

Shareholder

Gallagher & Kennedy
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My Practice

ENVIRONMENTAL - Chemical Facility Anti-Terrorism Standards Counseling, Environmental Assessment, Environmental Counseling, Environmental Due Diligence, Environmental Litigation, Environmental Natural Resources, Environmental Regulatory Enforcement, Environmental Regulatory Permitting, Environmental Remediation, Environmental Rulemaking, Hazardous Materials Counseling, Hazardous Materials Enforcement, Occupational Safety and Health Counseling, Occupational Safety and Health Enforcement

ADMINISTRATIVE LAW - Environmental Regulation and Compliance

NATURAL RESOURCES - Agriculture, Air Quality

LITIGATION - Environmental Litigation

GOVERNMENT AFFAIRS & LOBBYING - Regulatory Tactics

PROFESSIONAL SUMMARY

Over the last 25 years, Chris has focused his practice on high-profile civil and criminal environmental investigations and enforcement actions. Educated and working as a chemical engineer in the nuclear industry before deciding to become a lawyer has been invaluable to Chris and to his clients. His unique combination of engineering and law degrees makes him especially well-suited to handle complex environmental matters and interact with both in-house attorneys and technical resources.

Chris is a nationally recognized Resource Conservation and Recovery Act (RCRA) practitioner, counseling clients on issues relating to the identification and management of solid and hazardous wastes, financial assurance, corrective action, permitting, boiler and industrial furnace compliance, underground storage tank testing and removal, and land disposal restriction requirements. Additionally, Chris represents clients in U.S. Environmental Protection Agency (EPA) enforcement actions under RCRA, the Clean Air Act (CAA), the Emergency Planning and Community Right-to-Know Act (EPCRA), and the Toxic Substances Control Act (TSCA), as well as in analogous state actions. He is also experienced in representing the interests of mining and mineral processing companies, utilities and manufacturing entities regarding regulatory compliance.

Within his practice, Chris has developed extensive experience in hazardous materials transportation, occupational safety and health, and chemical facility anti-terrorism standards and issues. In these matters, he routinely works with appropriate federal agencies, including the U.S. Department of Transportation (DOT), the U.S. Occupational Safety and Health Administration (OSHA), and the U.S. Department of Homeland Security (DHS).

In evaluating and developing environmental preventative litigation and risk management strategies, Chris works to understand client objectives to partner in advancing creative and cost-effective solutions. Throughout his career, he has performed over 50 environmental and due diligence audits for clients and ably develops audit programs as needed.

With a high regard for long lasting relationships, Chris has represented the national trade association for the fertilizer industry for over 25 years. As such, he is extremely familiar with the fertilizer industry, the fertilizer manufacturing process, and environmental regulations applicable to the industry. He has prepared numerous comments on EPA, OSHA, DOT, and DHS proposed rules applicable to the industry, testified before these agencies on their proposed rules, challenged these rules in federal court, and negotiated favorable settlements for this client and its members.

REPRESENTATIVE EXPERIENCE

- Representing clients in RCRA national enforcement initiative matters referred to the U.S. Department of Justice (DOJ) for civil enforcement.
- Representing a client in a significant and novel RCRA enforcement matter involving EPA headquarters and several EPA regional offices.
- Representing a Fortune 100 company in a RCRA criminal investigation matter.
- Representing clients in CAA national enforcement initiative matters referred to DOJ for civil enforcement.
- Representing clients in self-disclosures of CAA, RCRA and TSCA violations to EPA.
- Assisting a client in obtaining a correction to the TSCA Inventory for a chemical substance.
- Preparing over 100 comments on EPA, OSHA, DOT, and DHS proposed rules.
- Obtaining a stay of an EPA CAA regulation for a national trade association in the U.S. Court of Appeals for the District of Columbia Circuit.
- Securing the vacatur of an OSHA Memorandum in the U.S. Court of Appeals for the District of Columbia Circuit. The Memorandum would have imposed over \$100 million in compliance costs on thousands of agricultural retailers in the United States.
- Representing clients in Superfund cost recovery actions.

EDUCATION

George Washington University
J.D., with honors, 1993

Pennsylvania State University
B.S., Chemical Engineering, 1987

BAR & COURT ADMISSIONS

- District of Columbia, 1994
- Arizona, 2002
- U.S. Court of Appeals, District of Columbia, 1995
- U.S. District Court, District of Columbia, 2001
- U.S. Court of Appeals, Ninth Circuit, 2002
- U.S. District Court, District of Arizona, 2017

ASSOCIATIONS & MEMBERSHIPS

- State Bar of Arizona, Member
- State Bar of the District of Columbia, Member

HONORS & AWARDS

- AV Preeminent Peer Review Rating, *Martindale-Hubbell*
- *Chambers USA*®, 2008-2019
- *Who's Who Legal: Environment*, 2015
- *Marquis Who's Who*, "Who's Who in American Law"

COMMUNITY & PHILANTHROPY

Circle G at Riggs Homestead Ranch Homeowners Association, Vice President, Board of Directors

PUBLISHED WORKS

- How Will Expansion of Chemical Safety Law Impact Arizona Businesses?, February 21, 2018
- Co-Author, Four Considerations for Challenging Agency Actions, Law360, 2016
- The Most Frequently Asked Questions in Environmental Law, Chapter 4 (Management of Solid and Hazardous Waste), Maricopa County Bar Association, 2011
- The RCRA Practice Manual, Second Edition, Chapter 14 (Regulation of Underground Storage Tanks), American Bar Association, 2013