

Regulatory Consulting

Client Centered

TLI Solutions, Inc. (a TechLaw Company) having over 20 years of regulatory support services understands the policies and regulations that govern all the major environmental programs.

TLI Solutions, Inc. (TLI) has provided environmental support services to government and commercial clients for over 20 years. Our regulatory support experience includes the following:

- Providing assistance to clients in determining which regulations and policies affect them, and with interpreting the applicable provisions regarding thousands of environmental sites;
- Supporting the major environmental programs including the Resource Conservation and Recovery Act (RCRA), the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Clean Water Act (CWA), and the Clean Air Act (CAA);
- Conducting extensive legal research and disseminating information concerning administrative, statutory, and policy reforms on the federal, state, and regional levels, and analyzing the implications of policy implementation.

Cleanup Regulations

Through TLI's expertise regarding environmental regulations, we can assist you in making decisions regarding the technical cleanup approach at a site. We are familiar with many different industry sectors, including the service, manufacturing, and mining industries, and therefore, are cognizant of the types of hazardous wastes that may have been produced and the regulations governing the cleanup of such wastes. Before expending funds on a cleanup, it is necessary to

determine if on-site contamination exceeds allowable levels. TLI conducts regulatory research and uses analytical data to develop, identify, and evaluate Applicable or Relevant and Appropriate Requirements (ARARs). These evaluations have an impact on the cost of remediation, in that ARARs provide a measure of the maximum levels of contaminants acceptable for the site. Different ARARs include significant variability in levels of remedial activity, which directly affects the costs of such activity. Many Brownfields sites are using risk-based cleanups; TLI has risk assessors on staff who assist with the evaluation of whether a risk-based cleanup is the best approach for a particular site.

Liability Regulations

TLI has conducted extensive environmental liability research. We review the known site facts, conduct additional research, and determine the potential liability for a developer or other stakeholder. We also conduct research to identify other potentially responsible parties that can be brought to the table. TLI has prepared over a thousand liability analysis reports identifying parties potentially responsible for environmental contamination under statutes and case law.

TLI Project Examples

Polychlorinated Biphenyl Cleanup

TLI compiled ARARs for U.S. Environmental Protection Agency (EPA)



Region 2 for the Hudson River polychlorinated biphenyls (PCBs) site. This work required the research and identification of federal and New York State statutes and regulations concerning contamination levels in water and river sediments, navigable waters of the United States, recreational use of the rivers of New York, drinking water, and disposal of contaminated media.

Environmental Compliance Assessment System

Under the U.S. Army Corps of Engineers' (USACE) Environmental Compliance Assessment System (ECAS) program, TLI has provided multimedia environmental compliance assessments at active federal facilities. These assessments involve a regulatory review of all state and local regulations within 22 separate environmental areas to determine whether they are more stringent than federal requirements. The environmental areas assessed under the ECAS program include CAA; CWA; Safe Drinking Water Act (SDWA); RCRA-Subtitle C; RCRA-Subtitle D; RCRA Subtitle I and Petroleum, Oils, and Lubricants (POL) management; CERCLA; Toxic Substances Control Act (TSCA); Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA); National Historic Preservation Act (NHPA) and Cultural Resources; Endangered Species Act (ESA) and Natural Resources; National Environmental Policy Act (NEPA); Asbestos Management Program; Noise Abatement Program; Radon Abatement Program; Environmental Program Management; Hazardous Materials Management (HAZMAT); and Pollution Prevention.

Environmental Regulation Experience

TLI has conducted over 325 RCRA corrective action oversight and CERCLA

remedial oversight projects for over 22 years. We have provided review of technical documents, hydrogeological and geological analysis, and field oversight support for all aspects of the remedial process, from the review and preparation of sampling and analysis plans through 5-year reviews, including quality assurance/ quality control (QA/QC) documents, work plans, remedial design actions, risk assessments, and public outreach materials. TLI supports EPA CERCLA and RCRA oversight activities at private and federal facilities; remedial and corrective action technical and field support (RI/FS, RD/RA, RFA, RFI, etc.); sampling, analysis and data management activities; human health and ecological risk assessment; litigation/negotiation support; and unexploded ordnance (UXO) support. This work involves ensuring that the remedial work is being conducted in conformance with all applicable regulations.

Liability Analysis Experience

Since 1983, as a prime contractor or subcontractor on 16 EPA Technical Enforcement Support contracts and 10 USACE district contracts, TLI has performed investigations at over a thousand hazardous waste sites. These investigations have documented the involvement of parties potentially responsible for costs of environmental cleanup, both in terms of assessing potential liability and allocating potential responsibility. TLI analyzes CERCLA, RCRA, and state statutory provisions and relevant case law to evaluate liability. Our experience includes evaluating the appropriateness of costs and remedial activities under the National Contingency Plan regulations.