



Environmental

Alert

May 2017

New Delegation Centralizes Largest Superfund Cleanup Decisions

In a move designed to streamline approvals of and ensure consistency among the largest Superfund cleanups, EPA Administrator Scott Pruitt last week approved a new delegation of authority giving him and his yet-to-be-named deputy the final signature authority to approve large Superfund cleanups over \$50 million. Prior to the revision, approval authority rested with EPA's 10 regional administrators and the assistant administrator of the Office of Land and Emergency Management.

Some are hailing the change as a necessary improvement in a cumbersome Superfund process that often slows cleanup of the nation's most complicated and contaminated sites; however, those familiar with the workings of EPA may recognize that the change may produce a logiam in the administrator's office, as scientifically and legally complicated decisions and documents are routed to a single person for signature.

Potentially responsible parties, citizens, and other stakeholders will now be required to navigate the bureaucracy of EPA's Washington, D.C. headquarters.

About Greenberg Traurig's Environmental Practice

Greenberg Traurig's Environmental Practice assists clients with issues under the environmental and natural resource laws that affect their businesses. The firm's environmental attorneys, some of whom previously worked at EPA headquarters, assist with securing permits and approvals; negotiate and close transactions; defend clients in enforcement actions; handle a broad range of environmental and toxic tort litigation; ensure the understanding and satisfaction of regulatory requirements; prepare for and respond to emergencies; craft approaches for legacy cleanup issues; and develop solutions for product regulation, market access, and environmental policy challenges.

This GT Alert was prepared by Bernadette M. Rappold. Questions about this information can be directed to:

- > Bernadette M. Rappold | +1 202.331.3127 | rappoldb@gtlaw.com
- > Or your Greenberg Traurig attorney

Albany	Delaware	New York	Silicon Valley
+1 518.689.1400	+1 302.661.7000	+1 212.801.9200	+1 650.328.8500
Amsterdam	Denver	Northern Virginia	Tallahassee
+ 31 20 301 7300	+1 303.572.6500	+1 703.749.1300	+1 850.222.6891
Atlanta	Fort Lauderdale	Orange County	Tampa
+1 678.553.2100	+1 954.765.0500	+1 949.732.6500	+1 813.318.5700
Austin	Houston	Orlando	Tel Aviv^
+1 512.320.7200	+1 713.374.3500	+1 407.420.1000	+03.636.6000
Berlin¬ +49 (0) 30 700 171 100	Las Vegas	Philadelphia	Tokyo¤
	+1 702.792.3773	+1 215.988.7800	+81 (0)3 4510 2200
Berlin-GT Restructuring +49 (0) 30 700 171 100	London*	Phoenix	Warsaw~
	+44 (0)203 349 8700	+1 602.445.8000	+48 22 690 6100
Boca Raton	Los Angeles	Sacramento	Washington, D.C.
+1 561.955.7600	+1 310.586.7700	+1 916.442.1111	+1 202.331.3100
Boston	Mexico City+	San Francisco	Westchester County
+1 617.310.6000	+52 55 5029.0000	+1 415.655.1300	+1 914.286.2900
Chicago	Miami	Seoul∞	West Palm Beach
+1 312.456.8400	+1 305.579.0500	+82 (0) 2.369.1000	+1 561.650.7900
Dallas	New Jersey	Shanghai	
+1 214.665.3600	+1 973.360.7900	+86 (0) 21.6391.6633	

This Greenberg Traurig Alert is issued for informational purposes only and is not intended to be construed or used as general legal advice nor as a solicitation of any type. Please contact the author(s) or your Greenberg Traurig contact if you have questions regarding the currency of this information. The hiring of a lawyer is an important decision. Before you decide, ask for written information about the lawyer's legal qualifications and experience. Greenberg Traurig is a service mark and trade name of Greenberg Traurig, LLP and Greenberg Traurig, P.A. ¬Greenberg Traurig's Berlin office is operated by Greenberg Traurig Germany, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ¬Berlin - GT Restructuring is operated by Köhler-Ma Geiser Partnerschaft Rechtsanwälte, Insolvenzverwalter. *Operates as a separate UK registered legal entity. **Greenberg Traurig is not responsible for any legal or other services rendered by attorneys employed by the strategic alliance firms. +Greenberg Traurig's Mexico City office is operated by Greenberg Traurig, S.C., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ∞Operates as Greenberg Traurig LLP Foreign Legal Consultant Office. ^Greenberg Traurig's Tel Aviv office is a branch of Greenberg Traurig, P.A., Florida, USA. ¤Greenberg Traurig Tokyo Law Offices are operated by GT Tokyo Horitsu Jimusho, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ~Greenberg Traurig's Warsaw office is operated by Greenberg Traurig Grzesiak sp.k., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. Certain partners in Greenberg Traurig Grzesiak sp.k. are also shareholders in Greenberg Traurig, P.A. Images in this advertisement do not depict Greenberg Traurig attorneys, clients, staff or facilities. No aspect of this advertisement has been approved by the Supreme Court of New Jersey. ©2017 Greenberg Traurig, LLP. All rights reserved