

**Chet M. Thompson**

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Practice Areas

- Environment & Natural Resources
- Administrative & Regulatory
- Torts
- Product Risk Management
- Litigation
- Trade Associations
- Latin America Practice

Chet M. Thompson is a partner in the Washington, D.C. office of Crowell and Moring and a member of the firm's Environment & Natural Resources Group. Chet is the former deputy general counsel and associate deputy general counsel of the U.S. Environmental Protection Agency (EPA), positions he held between 2004 and 2006. His practice includes counseling, litigation, and regulatory and legislative representation of a wide array of clients under the major environmental statutes, including the Clean Air Act (CAA), the Resource Conservation and Recovery Act (RCRA), and the Comprehensive Environmental Response, Compensation, Liability, and Recovery Act (CERCLA).

As EPA's deputy general counsel, Chet provided legal advice to the EPA administrator, the general counsel, and various program offices, particularly the office of air and radiation (OAR), the office of enforcement and compliance assurance (OECA), and the office of solid waste (OSW). During his tenure, Chet oversaw the agency's air and radiation law office and the legal aspects of many of the Bush Administration's hallmark CAA initiatives, including off-road engine and low-sulfur diesel standards, the Clean Air Interstate Rule (CAIR), the Clean Air Mercury Rule (CAMR), New Source Review (NSR) reforms, designations and implementation of the revised national ambient air quality standards (NAAQS) for ozone and particulate matter, and implementation of the CAA's residual risk program. He also supervised the agency's legal defense and appellate dockets and the day-to-day legal support of EPA's CAA title V, New Source Performance Standards (NSPS), NSR, and prevention of significant deterioration (PSD) programs. Additionally, Chet provided legal counseling on a number of energy issues, including permitting of oil and gas exploration and processing plants, coal-fired power plants, and liquefied natural gas (LNG) facilities.

Chet also supervised the agency's solid waste and emergency response law office, which provides legal support for CERCLA and RCRA issues. He was the United States' lead negotiator in multi-year negotiations that culminated in a

landmark settlement with a Canadian mining company over the extraterritorial application of CERCLA and liability associated with the historic contamination of the Upper Columbia River in Washington State. The settlement guaranteed full-funding for a comprehensive, multi-year study of human health and ecological risks at the site and avoided years of protracted litigation between the United States and Canada that could have had negative ramifications for U.S. industries.

Prior to joining EPA, Chet was a partner in the environmental practice group of another major D.C. law firm. He represented trade associations and companies in the steel, nonferrous metals, petroleum, and forest and paper industries on a number of CAA and RCRA regulatory and litigation matters.

Chet received a B.A. in Political Science, *cum laude*, from Boston College in 1990, and his J.D. from Catholic University, the Columbus School of Law in 1993, graduating in the top five percent of his class. He is admitted to the bars of the District of Columbia and Maryland.

Education

- Boston College, B.A. Political Science (1990) *cum laude*
- Catholic University of America, Columbus School of Law, J.D. (1993)

Affiliations

Admitted to practice: District of Columbia, Maryland

Publications

- "Climate Change: Things Are Starting to Heat Up," *Crowell & Moring Mining Law Monitor*, Vol. 23, Issue 1 (Fall/Winter 2006). Co-Authors: Ann R. Klee and Chet M. Thompson.
- "Dust in the Wind: EPA Revises the PM National Ambient Air Quality Standards," *Crowell & Moring Mining Law Monitor*, Vol. 23, Issue 1 (Fall/Winter 2006). Author: Chet M. Thompson.

Alerts & Newsletters

- "Commission Approves Climate Disclosure Guidance," *Environment & Natural Resources Law Alert* (February 3, 2010). Contacts: Chet M. Thompson, Bryan Brewer.

- "EPA Announces Plans To Reconsider Ozone Air Quality Standards," *Environment & Natural Resources Law Alert* (September 18, 2009). Contacts: Chet M. Thompson, Robert Meyers.
- "EPA Proposes Greenhouse Gas Endangerment Finding," *Environment & Natural Resources Law Alert* (April 17, 2009). Contact: Chet M. Thompson.
- "Congress Tightens Toxics Release Inventory Reporting for 2008 Chemical Data," *Product Risk Management Alert* (March 18, 2009). Contact: Chet M. Thompson.
- "EPA Releases Proposed Rule for Mandatory Greenhouse Gas Reporting," *Environment & Natural Resources Law Alert* (March 11, 2009). Contact: Chet M. Thompson.
- "EPA Proposes Significant Expansion of Audit Policy to Encourage Environmental Clean Up at Newly Acquired Facilities," *Environment & Natural Resources Law Alert* (August 8, 2008). Contact: Chet M. Thompson.

Speaking Engagements

- "Green is the New Black / Emissions Trading in a Cap and Trade world," webinar, SAS Institute Cary, NC (May 26, 2010). Panelists: Mike Gill and Chet Thompson.
- "EPA Regulation of Greenhouse Gases Under the Clean Air Act," Energy and Mineral Law Foundation Annual Institute (May 2009). Co-Presenters: Jessica A. Hall and Chet M. Thompson.