

**THE ATTORNEYS GENERAL OF NEW YORK, CALIFORNIA, DELAWARE, HAWAII,
ILLINOIS, MASSACHUSETTS, MINNESOTA, NEW JERSEY, OREGON,
RHODE ISLAND, VERMONT, WASHINGTON, AND THE DISTRICT OF COLUMBIA,
AS WELL AS THE CALIFORNIA AIR RESOURCES BOARD**

April 20, 2026

Via Electronic Filing

Docket ID No. EPA-HQ-OAR-2025-0207

Administrator Lee Zeldin
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

**Re: *National Emission Standards for Marine Tank Vessel Loading Operations:
Technology Review; Proposed Rule, 91 Fed. Reg. 10559 (Mar. 4, 2026)***

Dear Administrator Zeldin:

The Attorneys General of New York, California, Delaware, Hawaii, Illinois, Massachusetts, Minnesota, New Jersey, Oregon, Rhode Island, Vermont, Washington, and the District of Columbia, as well as the California Air Resources Board (together, the “States”) submit these comments regarding the U.S. Environmental Protection Agency’s (“EPA” or the “Agency”) proposed rule concerning National Emission Standards for Marine Tank Vessel Loading Operations (“MTVLO”): Technology Review (the “Proposed Rule”), 91 Fed. Reg. 10559 (Mar. 4, 2026).

While the States support the adoption of technological controls to reduce emissions of hazardous air pollutants (“HAPs”) and volatile organic compounds (“VOCs”), the States oppose two aspects of the Proposed Rule. First, the States oppose EPA’s decision “not [to] attempt to monetize the health benefits” of emission reductions in the Proposed Rule. *Id.* at 10,575. It is arbitrary and capricious for EPA to conduct a cost-benefit analysis that focuses exclusively on compliance costs to industry. Further, EPA’s decision to stop monetizing health benefits in this rulemaking (and in three other recent rulemakings¹) represents a stark departure from EPA’s longstanding methodology and violates agency guidance materials. Second, the States oppose EPA’s new position that Section 112(f)(2) of the Clean Air Act prohibits the Agency from updating its residual risk reviews of the national emission standards for hazardous air pollutants,

¹ See New Source Performance Standards Review for Stationary Combustion Turbines and Stationary Gas Turbines, 91 Fed. Reg. 1910, 1964 (Jan. 15, 2026); Rescission of the Greenhouse Gas Endangerment Finding and Motor Vehicle Greenhouse Gas Emission Standards Under the Clean Air Act, 91 Fed. Reg. 7686, 7757 (Feb. 18, 2026); National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units: Final Repeal, 91 Fed. Reg. 9088 (Feb. 24, 2026).

even when those reviews become obsolete. Here, the data suggests that EPA’s residual risk review for MTVLO is obsolete and that EPA should have updated its residual risk review in conjunction with the Proposed Rule.

EPA’s decision not to monetize health benefits and its new interpretation that risk reviews cannot be updated, even when obsolete, will inevitably lead to weaker regulations of HAPs, which will harm the States and their residents.² The States urge EPA to reconsider these changes and to restore the Agency’s longstanding practice of monetizing the health benefits of avoided emissions, as well as the Agency’s previous understanding that Section 112 of the Clean Air Act allows EPA to update residual risk reviews to incorporate new science.

I. EPA Should Continue to Monetize the Health Benefits of Reducing Emissions

For more than three decades, EPA maintained a consistent practice of monetizing the public health benefits of reducing emissions of hazardous air pollutants when conducting cost-benefit analysis. This practice was consistent with Executive Order 12866 of 1993, which provides:

In deciding whether and how to regulate, agencies should assess all costs and benefits of available regulatory alternatives, including the alternative of not regulating. **Costs and benefits shall be understood to include both quantifiable measures (to the fullest extent that these can be usefully estimated) and qualitative measures of costs and benefits that are difficult to quantify, but nevertheless essential to consider.** Further, **in choosing among alternative regulatory approaches, agencies should select those approaches that maximize net benefits** (including potential economic, environmental, public health and safety, and other advantages; distributive impacts; and equity), unless a statute requires another regulatory approach.

See Exec. Order No. 12866, 58 Fed. Reg. 51735 (Oct. 4, 1993) (emphasis added). Over the years, EPA developed considerable expertise in quantifying and monetizing the benefits of emission reductions, which helped to ensure that EPA’s rules and regulations for regulating air toxics “maximize net benefits,” including “public health benefits,” as Executive Order 12866 directs—rather than simply minimizing costs borne by regulated industries.

Despite that longstanding policy and practice, EPA states in Section IV.E of the Proposed Rule that it did not attempt to monetize the health benefits of HAP and VOC reductions due to “methodology and data limitations” and “uncertainties . . . regarding the potential benefit estimates from reduction in exposure from fine particulate matter (PM_{2.5}) and ozone.” 91 Fed. Reg. at 10575. In effect, the cost-benefit analysis in the Proposed Rule gives full weight to the

² Commenting States that contain marine tank vessel loading facilities subject to this regulation include California, Delaware, Hawaii, Illinois, Massachusetts, New York, New Jersey, Oregon, and Washington. *See* EPA, EPA-HQ-OAR-2025-0207-0031, List of Facilities Subject to the MTVLO NESHP (Mar. 4, 2026), <https://downloads.regulations.gov/EPA-HQ-OAR-2025-0207-0031/content.pdf>.

compliance costs borne by industry while giving no weight to public health benefits, essentially reducing the value of human life to zero.

EPA's decision to disregard public health benefits based on purported concerns about uncertainty is arbitrary and capricious under Section 706 of the Administrative Procedure Act. *See* 5 U.S.C. § 706(2)(a). First, to the extent that some amount of uncertainty is inherent in monetizing health benefits, it does not logically follow that the solution is to completely disregard health benefits in the Agency's quantitative cost-benefit analysis. *See Mont. Wilderness Ass'n v. McAllister*, 666 F.3d 549, 559 (9th Cir. 2011) (“[T]he proper response to [uncertainty] is for the Service to do the best it can with the data it has, not to ignore [it].”); *Ctr. for Biological Diversity v. NHTSA*, 538 F.3d 1172, 1198 (9th Cir. 2008) (holding that it was arbitrary and capricious not to monetize benefits of emission reductions when agency monetized other uncertain factors). Indeed, when the data is uncertain, “the agency’s job is to exercise its expertise to make tough choices about which of the competing estimates is most plausible, and to hazard a guess as to which is correct, even if . . . the estimate will be imprecise.” *Pub. Citizen v. Fed. Motor Carrier Safety Admin.*, 374 F.3d 1209, 1221 (D.C. Cir. 2004). If EPA suddenly lacks the confidence to make those tough choices, it could still discharge its statutory duties by considering a range of health benefits. *See Chamber of Com. of U.S. v. SEC*, 412 F.3d 133, 143 (D.C. Cir. 2005) (finding that although an agency sometimes “can determine only the range” of costs or benefits due to uncertainty, the agency still must conduct an economic analysis under those circumstances). Either of those options would be better than declining to monetize benefits whatsoever.

Second, it is arbitrary and capricious not to monetize public health benefits based on purported concerns about uncertainty while continuing to monetize regulatory costs when such costs are also uncertain and rely on various assumptions and estimates. *See, e.g.,* RTI Int'l, Technology Review for National Emission Standards for MTVLO 24 (Sept. 4, 2025)³ (“We assumed that electronic reporting would reduce recordkeeping and reporting burden by two technical hours per year per facility.” (emphasis added)); *id.* (“We estimated that there would be approximately 200 control devices at major source MTVLO facilities. We assumed that 50 of these control devices are vapor recovery systems (carbon adsorbers, refrigerated condensers, or absorbers), 100 are thermal oxidizers, and 50 are flares.” (emphasis added)). Ultimately, calculating compliance costs with precision while declining to calculate benefits arbitrarily elevates industry interests over other interests, *see Ctr. for Biological Diversity*, 538 F.3d at 1198 (holding that an agency “cannot put a thumb on the scale by undervaluing the benefits and overvaluing the costs of more stringent standards” when conducting cost-benefit analysis), and fails to account for “an important aspect of the problem” of emissions regulation, *see Motor Vehicle Mfrs. Ass'n of the U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983); *Michigan v. EPA*, 576 U.S. 743, 753 (2015) (explaining that “reasonable regulation ordinarily requires paying attention to the advantages and the disadvantages of agency decisions”); *Bus. Roundtable v. SEC*, 647 F.3d 1144, 1148-49 (D.C. Cir. 2011) (explaining that an agency acted arbitrarily and capriciously when it “inconsistently and opportunistically framed the costs and

³ Available at <https://downloads.regulations.gov/EPA-HQ-OAR-2025-0207-0051/content.pdf>.

benefits of the rule” and “failed adequately to quantify the certain costs or to explain why those costs could not be quantified”).

Third, EPA’s failure to quantify and monetize public health benefits violates a range of guidance materials. These materials include Circular A-4, the Office of Management and Budget’s (“OMB”) longstanding guidance to federal agencies on the development of regulatory and economic analyses.⁴ According to Circular A-4, “[s]ound quantitative estimates of benefits and costs, where feasible, are preferable to qualitative descriptions of benefits and costs because they help decision makers understand the magnitudes of the effects of alternative actions.” OMB Circular A-4, at 26 (Sept. 17, 2003).⁵ When cost and benefit estimates are uncertain, OMB directs agencies to “report benefit and cost estimates . . . that reflect the full probability distribution of potential consequences” and emphasizes that an agency “should monetize quantitative estimates whenever possible.” *Id.* at 18, 27.

EPA’s own guidance is consistent with OMB guidance on the topic of monetization. For example, EPA’s Guidelines for Preparing Economic Analyses, all of which underwent external peer review, include detailed guidance about how to prepare mortality risk valuation estimates. EPA, EPA-240-R-24-001, Guidelines for Preparing Economic Analyses app. B (3d ed. Dec. 2024).⁶ The Guidelines also describe how to address and account for analytic uncertainty, which is a part of every cost-benefit analysis, and explain that in assessing uncertainty, EPA should present outcomes or conclusions based on the most plausible values and perform sensitivity analysis on key assumptions. *See id.* at 5-29 to -34. As the Guidelines point out, “[e]ven for highly uncertain benefits[,] zero is not usually the best quantitative weight, and available evidence can often be used to produce some estimate that is more accurate than assuming these effects do not occur.” *Id.* at 7-9. Further, the advisory committee review that EPA cites for the proposition that the health benefits of the Proposed Rule are too uncertain to calculate, *see* EPA, Economic Impact Analysis for the Proposed Rule 12 (Dec. 2025),⁷ merely offers suggestions for improving EPA’s consideration of uncertainty and does not in any way suggest that monetization of health benefits is unwarranted, *see* EPA Sci. Advisory Bd., EPA-SAB-24-003, Review of BenMAP and Benefits Methods (Jan. 17, 2024).⁸

⁴ Although the Biden Administration issued an updated Circular A-4 in 2023, President Trump directed OMB to rescind that update in 2025 and reinstate the 2003 version of the document. *See* OMB, Circular No. A-4 (Nov. 9, 2023), <https://bidenwhitehouse.archives.gov/wp-content/uploads/2023/11/CircularA-4.pdf>; Exec. Order No. 14192 § 6(b), 90 Fed. Reg. 9065, 9067 (Feb. 6, 2025).

⁵ Available at <https://www.whitehouse.gov/wp-content/uploads/2025/08/CircularA-4.pdf>.

⁶ Available at https://www.epa.gov/system/files/documents/2024-12/guidelines-for-preparing-economic-analyses_final_508-compliant_compressed.pdf.

⁷ Available at https://www.epa.gov/system/files/documents/202603/eia_marinevesselloading_proposal_2026-02_0.pdf.

⁸ Available at https://sab.epa.gov/ords/sab/f?p=114:0:12861925547572:APPLICATION_PROCESS=REPORT_DOC::REPORT_ID:1124.

Fourth, EPA’s failure to provide a reasoned explanation for its change in longstanding practice is arbitrary and capricious under the change-in-position doctrine. Since 1993, EPA has employed the best available science to quantify and monetize benefits of regulatory changes aimed at reducing pollution. In fact, to ensure compliance with Executive Order 12866, EPA has been at the forefront of developing the rigorous, peer-reviewed methodologies that have allowed the agency to consider and communicate to the public the economic value of reductions in adverse health outcomes and avoided hospitalizations and deaths. In the Proposed Rule, EPA fails to even acknowledge its abrupt departure, much less confront the voluminous scientific evidence and guidelines underlying past practice, nor does it point to new scientific evidence to justify the agency’s change in policy. While EPA obliquely asserts that its prior practice of monetizing health benefits “may not have presented the full range of uncertainties and associated confidence level regarding the potential benefit estimates from reduction in exposure,” 91 Fed. Reg. at 10575, EPA does not explain what has changed to prompt its change in position, nor does EPA explain its decision not to comply with Executive Order 12866 or agency guidance that directs agencies to quantify benefits when feasible, *see FCC v. Fox Television Stations, Inc.*, 556 U.S. 502, 514-15 (2009).

Ultimately, EPA’s new practice of systematically failing to quantify and/or monetize the public health benefits associated with emission reductions while continuing to quantify compliance costs will encourage the Agency to adopt weaker regulations that prioritize industry interests over public health. The States urge EPA to reconsider this approach and to restore the Agency’s longstanding practice of monetizing the health benefits of avoided emissions.

II. EPA Should Consider Updated Scientific Information on Risks to Human Health and the Environment from Emission of HAPs

Under Clean Air Act Section 112, EPA sets emission standards for sources of HAPs using a two-step process. First, EPA promulgates technology-based emission standards under Section 112(d). Second, within eight years, EPA must (a) identify and address any remaining risk “in order to provide an ample margin of safety to protect public health” pursuant to Section 112(f)(2) (the “residual risk review”) and (b) revise the standards “as necessary (taking into account developments in practices, processes, and control technologies)” pursuant to Section 112(d)(6) (the “technology review”). EPA must conduct a technology review every eight years. EPA first promulgated emission standards for the MTVLO source category in 1995, 60 Fed. Reg. 48388 (Sept. 19, 1995), and completed its initial residual risk and technology review in 2011, 76 Fed. Reg. 22566, 22571 (Apr. 21, 2011).

In the Proposed Rule, EPA suggests that the Clean Air Act allows it to conduct only one residual risk review to determine whether the emission standards it has adopted provide an ample margin of safety to protect public health—and that the Agency is prohibited from updating those risk reviews, even when they become obsolete. 91 Fed. Reg. at 10562. EPA recently spelled out this new statutory interpretation more explicitly in a proposed rule to reconsider its 2024 final rule concerning ethylene oxide emissions. *See* National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review Reconsideration, 91 Fed. Reg. 12700, 12703 (Mar. 17, 2026). In that proposed rule, EPA asserts that the language of the statute prohibits the Agency from conducting more than one risk review or revisiting an outdated risk review. *Id.* According to EPA, the

language of Section 112(f) “cannot be squared with the [Agency’s previous] assertion of authority to revisit residual risk reviews on an ad hoc, category-by-category basis.” *Id.*

This incorrect statutory interpretation would unlawfully prevent the Agency from adopting the emission standards necessary to protect public health. As a practical matter, EPA’s reading would prohibit the Agency from ever updating its analysis of the risks HAPs pose to human health and the environment, even when old, obsolete analysis fails to accurately reflect the current scientific understanding about risks to public health. As a matter of statutory interpretation, just because Section 112(f)(2)(A) requires one residual risk review does not mean that it prohibits EPA from conducting more than one residual risk review. Moreover, EPA’s attempt to inoculate its regulations from new scientific developments is not supported by general principles of administrative law or by the text and purpose of Clean Air Act Section 112. Relying on obsolete risk reviews is fundamentally inconsistent with the language and aims of the Clean Air Act. *See Lead Indus. Ass’n, Inc. v. EPA*, 647 F.2d 1130, 1152-55 (D.C. Cir. 1980) (recognizing that the “precautionary nature” of the Clean Air Act requires EPA “to err on the side of caution”). Under Section 112(f)(2), EPA must set emission standards that “provide an ample margin of safety to protect public health,” incorporating a presumptive limit on maximum individual lifetime cancer risk of 100-in-1 million.⁹ EPA cannot confirm that the existing emission standards provide adequate protections unless it has first considered the relevant scientific evidence, which may change over time.

Here, EPA should update its MTVLO risk review, as its 2011 residual risk review relied on obsolete data about the human health risks posed by benzene. In its original 2011 residual risk review for the MTVLO source category, EPA analyzed data concerning MTVLO emissions and the health effects associated with those emissions, determining that the existing standards were sufficiently protective of human health and therefore did not require revision. *See* 76 Fed. Reg. at 22571. In reaching that determination, EPA used a reference value for acute benzene exposure that has changed dramatically in the intervening years. *See* EPA, Residual Risk Assessment for 7 Source Categories 41 (Jan. 2011).¹⁰ Specifically, EPA’s 2011 residual risk analysis used an acute one-hour inhalation reference exposure level (“REL”) of 1.3 mg/m³, which the California Environmental Protection Agency (“CalEPA”) had determined to be “the concentration level at or below which no adverse health effects are anticipated” over the course of one hour. *Id.* at 22, 24. In 2014, however, in light of new evidence of benzene’s toxicity, CalEPA updated the one-hour REL to 27 µg/m³ (0.027 mg/m³), decreasing the threshold for the amount of benzene considered safe to inhale on an acute basis by a factor of nearly 50. CalEPA, Technical Support Document for the Derivation of Noncancer Reference Exposure Levels app. D, at 3 (updated

⁹ 42 U.S.C. § 7412(f)(2)(B); National Emission Standards for Hazardous Air Pollutants; Benzene Emissions from Maleic Anhydride Plants, Ethylbenzene/Styrene Plants, Benzene Storage Vessels, Benzene Equipment Leaks, and Coke By-Product Recovery Plants, 54 Fed. Reg. 38044, 38044-45 (Sept. 14, 1989). EPA itself argued that the Clean Air Act does not limit the Agency to a one-time-only residual risk review in its 2024 ethylene oxide sterilizer rule and subsequent legal briefs filed in its defense. 89 Fed. Reg. 24090, 24093 (Mar. 5, 2024); EPA’s Final Answering Br., *Cal. Comm. Against Toxics v. EPA* at 28, No. 24-1178 (D.C. Cir. Apr. 15, 2025).

¹⁰ Available at <https://downloads.regulations.gov/EPA-HQ-OAR-2010-0600-0405/content.pdf>.

July 2014)¹¹; CalEPA, *Notice of Adoption of Revised Reference Exposure Levels for Benzene* (June 27, 2014).¹² The New York Department of Environmental Conservation subsequently adopted this updated reference value for its own regulatory activities, as has the Massachusetts Department of Environmental Protection. N.Y. Dep't of Env't Conservation, *Guidelines for the Evaluation and Control of Ambient Air Contaminants Under 6 NYCRR Part 212*, at 41, 51 (Feb. 12, 2021);¹³ Mass. Dep't of Env't Prot., *Cumulative Impact Analysis in Air Quality Permitting: Cumulative Impact Guidance and Tools*¹⁴ (providing link to "Inhalation Toxicity Values" spreadsheet, which contains the inhalation health benchmark values to be used in risk characterization for air toxics emissions during cumulative impact analysis in state air permits); Mass. Dep't of Env't Prot., *Inhalation Toxicity Values (v1.0)*, Worksheet Tab "Tox Values" at row 30 (Mar. 28, 2024)¹⁵ (relying on CalEPA in adopting a 30 µg/m³ acute inhalation concentration for benzene).

Given the fact that EPA's 2011 residual risk evaluation relied on a reference value for acute exposure to benzene that is now obsolete, EPA should update its residual risk evaluation for the MTVLO emission standards to ensure an "ample margin of safety to protect public health," as required by Section 112(f)(2).

III. Conclusion

For all of these reasons, EPA should (1) restore its longstanding practice of monetizing the health benefits of avoided emissions and (2) consider the updated scientific evidence concerning the risks associated with benzene emissions when evaluating whether its MTVLO emission standards are sufficiently protective of human health.

Sincerely,

¹¹ Available at <https://oehha.ca.gov/sites/default/files/media/downloads/crn/appendixd1final.pdf>.

¹² Available at <https://oehha.ca.gov/air/crn/notice-adoption-revised-reference-exposure-levels-benzene>.

¹³ Available at https://extapps.dec.ny.gov/docs/air_pdf/dar1.pdf.

¹⁴ Available at <https://www.mass.gov/info-details/cumulative-impact-analysis-in-air-quality-permitting#cia-guidance-and-tools>.

¹⁵ Available at <https://www.mass.gov/doc/inhalation-toxicity-values-v10/download>.

FOR THE STATE OF NEW YORK

LETITIA JAMES
Attorney General of New York

/s/ Matthew Eisenson

Matthew Eisenson

Assistant Attorney General

Libby Dimenstein

Special Assistant Attorney General

Morgan Costello

Deputy Bureau Chief

Amelia Grant Alfieri

D Wu

Staff Scientists

Environmental Protection Bureau

28 Liberty Street, 19th Floor

New York, New York 10005

(212) 416-8481

matthew.eisenson@ag.ny.gov

FOR THE STATE OF CALIFORNIA

ROB BONTA
Attorney General of California

/s/ Monica Heger

Monica Heger

Deputy Attorney General

Christie Vosburg

Supervising Deputy Attorney General

Deborah M. Smith

Acting Senior Assistant Attorney General

California Department of Justice

Environmental Justice & Protection Section

1300 I Street

Sacramento, California 95814

monica.heger@doj.ca.gov

FOR THE CALIFORNIA AIR RESOURCES
BOARD

/s/ Jonathan A. Wiener

Jonathan A. Wiener

Deputy Attorney General

California Department of Justice

Natural Resources Law Section

455 Golden Gate Ave., Suite 11000

San Francisco, California

(415) 510-3549

jonathan.wiener@doj.ca.gov

FOR THE STATE OF DELAWARE

KATHLEEN JENNINGS
Attorney General of Delaware

/s/ Vanessa L. Kassab

Ian R. Liston

Director of Impact Litigation

Ralph K. Durstein

Vanessa L. Kassab

Deputy Attorneys General

Delaware Department of Justice

820 N. French Street

Wilmington, Delaware 19801

(302) 683-8899

vanessa.kassab@delaware.gov

FOR THE STATE OF HAWAII

ANNE E. LOPEZ
Attorney General of Hawai'i

/s/ Lyle T. Leonard

Lyle T. Leonard

Deputy Attorney General

State of Hawaii

Department of the Attorney General

465 South King Street #200

Honolulu, Hawaii 96813

(808) 587-3052

lyle.t.leonard@hawaii.gov

FOR THE DISTRICT OF COLUMBIA

BRIAN L. SCHWALB
Attorney General of the District of Columbia

/s/ Lauren Cullum

Lauren Cullum

Special Assistant Attorney General

Office of the Attorney General for the
District of Columbia

400 6th Street, N.W., 10th Floor

Washington, D.C. 20001

lauren.cullum@dc.gov

FOR THE STATE OF ILLINOIS

KWAME RAOUL
Attorney General of Illinois

/s/ Jason E. James

Jason E. James

Assistant Attorney General

Matthew J. Dunn

*Chief, Environmental Enforcement/
Asbestos Litigation Division*

Joanna Brinkman

Complex Litigation Counsel

Illinois Attorney General's Office

201 W. Pointe Drive, Suite 7

Belleville, Illinois 62226

(217) 843-0322

jason.james@ilag.gov

FOR THE STATE OF MASSACHUSETTS

ANDREA JOY CAMPBELL
Attorney General of Massachusetts

/s/ Amy Laura Cahn

Amy Laura Cahn
Special Assistant Attorney General
Tracy Triplett
Senior Enforcement Counsel
Assistant Attorney General
Energy and Environment Bureau
Massachusetts Office of the Attorney General
One Ashburton Place
Boston, Massachusetts 02108
617-963-2281
Amy.Laura.Cahn@mass.gov

FOR THE STATE OF NEW JERSEY

JENNIFER DAVENPORT
Acting Attorney General of New Jersey

/s/ J. Matthew Novak

J. Matthew Novak
Deputy Attorney General
Richard J. Hughes Justice Complex
25 Market Street, 7th Floor
Trenton, New Jersey 08611
(609) 262-4849

FOR THE STATE OF MINNESOTA

KEITH ELLISON
Attorney General of Minnesota

/s/ Peter Surdo

Peter Surdo
Alyssa Bixby-Lawson
Special Assistant Attorneys General
Environmental & Natural Resources Division
445 Minnesota Street, Suite 600
Saint Paul, Minnesota 55101
(651) 300-6637
peter.surdo@ag.state.mn.us

FOR THE STATE OF OREGON

DAN RAYFIELD
Attorney General of Oregon

/s/ Paul Garrahan

Paul Garrahan
Attorney-in-Charge,
Natural Resources Section
Oregon Department of Justice
1162 Court Street NE
Salem, Oregon 97301-4096
(503) 947-4540
Paul.Garrahan@doj.oregon.gov

FOR THE STATE OF RHODE ISLAND

PETER F. NERONHA
Attorney General of Rhode Island

/s/ Nicholas M. Vaz

Nicholas M. Vaz
Special Assistant Attorney General
Environment and Energy Unit Chief
Rhode Island Office of the Attorney General
150 South Main Street
Providence, Rhode Island 02903
(401) 274-4400 ext. 2297
nvaz@riag.ri.gov

FOR THE STATE OF VERMONT

CHARITY R. CLARK
Attorney General of Vermont

/s/ Melanie Kehne

Melanie Kehne
Assistant Attorney General
109 State Street
Montpelier, Vermont 05609-3201
(802) 828-3186
melanie.kehne@vermont.gov

FOR THE STATE OF WASHINGTON

NICHOLAS W. BROWN
Attorney General of Washington

/s/ Christopher H. Reitz

Christopher H. Reitz
Assistant Attorney General
Office of the Attorney General
P.O. Box 40117
Olympia, Washington 98504-0117
(360) 586-6770
chris.reitz@atg.wa.gov