ATTACHMENT 4

to CEJA's Request for Intervenor Compensation, R.12-03-014

Resumes of Deborah Behles, Shanna Foley, Shana Lazerow and Julia May

DEBORAH NICOLE BEHLES

415-369-5336; dbehles@ggu.edu

EMPLOYMENT

ASSOCIATE PROFESSOR AND STAFF ATTORNEY July 2010 - present Aug. 2008 - July 2010 VISITING ASSISTANT PROFESSOR AND STAFF ATTORNEY Golden Gate University School of Law San Francisco, CA

Co-Teaching the Environmental Law and Justice Clinic and Seminar. Teaching Students How to Litigate and Problem Solve in Complex Setting. Leading and Supervising Students Work on Environmental and Energy Law Cases.

- ffi Leading Clinic Litigation in Energy and Air Pollution cases
- ffi Led Clinic Team to Overturn Decision to Exempt New Biodiesel Facility from **Environmental Review**
- ffi Led Clinic Team to Successful Agency Decision Requiring Consideration of Conservation and Renewables
- ffi Wrote Several Public Comments Related to Federal Pollution and Climate Change Regulations
- ffi Drafted and Filed Briefs Related to Pollution and Energy Issues
- ffi Developed New Teaching Materials for Seminar

TRIAL ATTORNEY Oct. 2001 - Aug. 2008 Washington, DC

United States Department of Justice

Litigated Civil Environmental Claims. Participated in Four Trials. Took and Defended Over Fifty Depositions. Worked with Numerous Health, Energy and Engineering Experts. Conducted Cross and Direct Examination of Experts at Trial. Wrote Discovery and Summary Judgment Motions and Briefs. Negotiated Judicial Settlements.

- ffi Honors Attorney
- ffi New Source Review Utility Initiative Litigation Team, 2002-2008, Resulting in Over a Million Ton Reduction of Air Pollution
- ffi Honors Attorney Hiring Committee
- ffi Taught Clean Air Act Classes at National Advocacy Center

EDUCATION

JURIS DOCTOR, magna cum laude May 2001 University of Minnesota Minneapolis, MN

- ffi Associate Articles Editor, Minnesota Law Review
- ffi Legal Writing Student Instructor
- ffi First Year Legal Writing Honors
- ffi Environmental Law Society Chair
- ffi Extern for the Honorable Michael Davis, District of Minnesota Federal Judge
- ffi Intern for the Minnesota Center for Environmental Advocacy

BACHELOR OF SCIENCE, with highest distinction May1998

Purdue University West Lafayette, IN

- ffi Graduated in Civil Engineering with an Environmental and Structural Emphasis
- ffi Chi Epsilon, Civil Engineering Honor Society, Member
- ffi Golden Key Honor Society, Member and Secretary
- ffi Community Service Chair, American Society of Civil Engineers

SB GT&S 0172987

HONORS AND AWARDS

- ffi Department of Justice John Marshall Award Recipient
- ffi U.S. Environmental Protection Agency Gold Medal Recipient
- ffi Department of Justice Special Commendations for Work on the Duke Energy, Illinois Power Trial, Westvaco Trial, and Power Plant Appellate Teams
- ffi Department of Justice Outstanding Performance Awards in 2004 and 2007
- ffi Mortar Board Graduate Fellowship
- ffi Bloodgood Memorial Scholarship for Outstanding Environmental Engineer
- ffi Recipient of Society of Woman Engineering Scholarships
- ffi Civil Engineering Page Speech Competition Winner

PUBLICATIONS

From Dirty to Green: Increasing Energy Efficiency and Renewable Energy in Environmental Justice Communities, 58 VILLANOVA L.R EVIEW 25-67 (2013).

An Integrated Green Urban Electrical Grid, 11 WM. & MARY ENVIL. L & POL'Y REV. 671-712 (2012).

Why California Failed to Meet Its RPS Target, 17 HASTINGS W.-NW. J. ENVIL. L. & POL'Y 163-188 (2011).

Examining the Air We Breathe: EPA Should Evaluate Cumulative Impacts When It Promulgates National Ambient Air Quality Standards, 28 PACE ENVIL. L. REVIEW 200-236 (2010).

The New Race: Speeding Up Climate Change Innovation, 11 NORTH CAROLINA J. OF LAW & TECHNOLOGY 1-50 (2009).

Why CEQA Exemption Decisions Need Additional Notice Requirements, 33 Environs 111-134 (2009).

A Wrong Turn Crushes Protective Air Regulations: American Trucking Ass'ns v. EPA, 85 MINNESOTA LAW REVIEW 319-365 (2000).

Roadmapping and Legal Writing, 8 Perspectives: Teaching Legal Research and Writing 134 (with Brad Clary) (2000).

PRESENTATIONS

Stanford Environmental Law Society, *Increasing Renewable Energy in Environmental Justice Neighborhoods* (November 2012).

Public Interest Environmental Law Conference, University of Oregon School of Law

- ffi Presenter, California Energy (February 2012).
- ffi Presenter, Slowing Down the Natural Gas Rush (February 2010).
- ffi Presenter, The Role of Environmental Clinics (February 2009).

Department of Justice Office of Legal Education, New Attorney Training

ffi Instructor, Overview of Clean Air Act (February 2008).

National Advocacy Center, Environmental Enforcement Conferences

- ffi Instructor, Emerging Issues in Clean Air Act (Spring 2007).
- ffi Instructor, New Source Review Issues, Calculating Emissions (Spring 2005).

SHANNA FOLEY

536 Mission Street, San Francisco CA 94105 Phone: 415-369-5351 Email: sfoley@ggu.edu

California State Bar No. 274996

Law Journal:

EDUCATION

Golden Gate University School of Law, San Francisco, CA

Doctor of Jurisprudence, with honors, May 2010

Certificate of Specialization with Distinction in Environmental Law, Public Interest Law

Class Rank: Top 10%

Honors: Outstanding Achievement in Public Interest Law

Dean's List: Fall 2007 - Summer 2008; Fall 2009 - Spring 2010

Environmental Law Program Scholar Jesse Carter Society Honoree

Witkin Awards for Academic Excellence: Contracts II, Torts II

CALI Excellence Awards: Writing & Research, Appellate Advocacy, Criminal Law Golden Gate University Environmental Law Journal, Pacific Region Edition Editor

Activities: Public Interest Law Foundation Co-Chair

National Lawyers Guild, GGU Chapter

Environmental Law Society

Southern Oregon University, Ashland, OR

Bachelor of Science cum laude in History, June 2007

EXPERIENCE

Golden Gate University Environmental Law & Justice Clinic

San Francisco, CA

Graduate Legal Fellow

January 2011 - March 2013

Draft motions and other legal pleadings, communicate with opposing council on various aspects of cases and negotiate settlements and stipulations. Communicate with clients about case strategy and updates. Research various legal issues including California and federal civil procedure requirements, collections law, and various environmental issues. Arrange and prepare for deposition. Coordinate and work with law student clinicians.

Graduate Staff Attorney

June 2011 – September 2011

Researched issues related to energy procurement and renewable energy integration in California for procurement proceeding before the PUC, including transparency and oversight issues over public utilities, and compliance with California's loading order and Renewable Portfolio Standard. Analyzed PG&E's procurement plan and related documents to identify legal and factual issues. Wrote briefs, motions, and testimony for PUC proceeding arguing for no additional procurement of fossil-fuels and increased procurement of renewable energy. Draft examination and cross-examination questions in preparation for PUC hearings. Attended meetings with PG&E and other parties and discussed case strategy with client.

Research Assistant September 2010 - May 2011

Drafted and submitted Public Records Act requests. Researched various constitutional and procedural issues such as 10th Amendment disputes under the Clean Air Act and rules and standards for intervening and relating cases. Researched case load and backgrounds of federal judges in preparation for filing of major case. Met with supervising attorneys and clients to discuss case strategy. Reviewed student memorandum to give feedback.

Student Clinician August 2009 - May 2010

Conducted extensive legal and factual research on numerous environmental laws and renewable energy issues, such as permitting requirements under the Clean Air Act and status of renewable energy projects across the state. Analyzed agency documents and environmental impact reports for comment letters to agencies. Drafted briefs, comment letters, discovery requests, and witness testimony.

California Public Utilities Commission

San Francisco, CA

Energy Division Intern

October 2011 – December 2011

Reviewed and analyzed proposed renewable projects and wrote resolutions approving, modifying, or rejecting rate recovery for projects. Reviewed and summarized comments submitted by various parties on proposed decisions, staff proposals, and other PUC documents to identify legal issues. Submitted data requests to utilities and communicated with utility contract managers

to address issues that arose when reviewing contracts. Worked with the Energy Division renewable procurement team to develop schedule for approving renewable contracts. Met with Administrative Law Judge to discuss proceeding status and identify major issues in the proceeding. Meet with utilities and other stakeholders to hear their concerns on various issues.

Graduate Law Fellow: Admissions Office

San Francisco, CA

Admissions Ambassador

March 2011 - June 2011

Conducted outreach to admitted students and answered their questions via phone, email, and in person meetings. Conducted tours, facilitated class visits, and spoke on student panels. Put mailing packets together, organized files, and processed seat deposits.

PlasticBagLaws.Org San Francisco, CA

Researcher

September 2010 – January 2011

Conduct research for website on plastic bag reduction ordinances, including information on jurisdictions that have banned plastic bags, recent CEQA litigation, and the impacts of Proposition 26. Update website with new information and studies regarding environmental impacts of plastic bags and write articles on plastic bag issues.

Law Offices of Stephen C. Volker

Oakland, CA

Legal Clerk

May 2009 - December 2009

Drafted and revised motions and sections of briefs, conducted research and wrote memoranda on various points of environmental and procedural law. Reviewed Environmental Impact Statements and Reports, among other agency documents. Wrote FOIA requests and organized and analyzed documents received through those requests. Compiled and summarized documents for settlement conferences, organized administrative records, and wrote comment letters to various agencies.

Center for Biological Diversity

San Francisco, CA

Legal Intern

September 2008 - April 2009

Conducted research, wrote memoranda on various points of environmental, procedural, and international law. Drafted and revised briefs, complaints, FOIA requests, and 60 day notice letters, wrote NEPA/CEQA comment letters.

Homeless Advocacy Project

San Francisco, CA

Student Clinician

June - August 2008

Represented a tenant in a housing dispute, including communicating with opposing attorney to reach a settlement agreement allowing tenant to remain in residence. Completed coursework on tenant's rights; conducted intake, and interviewed tenants.

Rainforest Action Network

San Francisco, CA

Media Intern

September 2005 - October 2004

Collected information for, and maintained, media databases. Conducted media research into various publications in preparation for publishing of articles and editorials. Drafted and revised press releases and advisories.

VOLUNTEER EXPERIENCE:

Common Ground Relief: Relief worker in post-hurricane New Orleans; March to Save Women's Lives: Co-organizer of student trip to march on Washington; Greenpeace: Volunteer with Ancient Forest campaign; Klamath Salmon Media Collaborative: Co-organizer of PacifiCorp protest and fundraising event.

SHANA LAZEROW

STATE BAR # 195491

1904 Franklin Street, Suite 600 Oakland, California 94612 510.302.0430 slazerow@cbecal.org

PROFESSIONAL EXPERIENCE

Communities for a Better Environment

November 2005-Present

Chief of Litigation

Prosecute environmental justice lawsuits on behalf of CBE and its members, represent CBE at hearings before State and Federal courts and before administrative agencies responsible for enforcing state and federal environmental laws, advise community members in areas affected by toxic pollution. As CBE Chief of Litigation, coordinate CBE's litigation load. Litigate using Federal Clean Air Act, Federal Clean Water Act, California Environmental Quality Act, and other environmental statutes.

University of California, Berkeley School of Law

August 2005-October 2005

Lecturer

Taught first year legal research and writing course.

Earthjustice Environmental Law Clinic at Stanford

January 2005-July 2005

Project Attorney Litigated mandamus actions targeted at securing effective regulation of agricultural and logging discharges under CEQA and the Porter Cologne Act. Enforced Clean Water Act permiting requirements concerning dioxin discharges in San Francisco Bay watershed. Co-taught seminar focusing on equiping students to become environmental lawyers. Subjects included civil and administrative procedure, ethics and advanced legal writing. Met several times weekly with clinicians to hone written and oral advocacy technique. Designed assignments to provide high quality educational experiences for students and secure best possible outcomes for clients, such as: drafting and filing briefs with the California Court of Appeal and Superior Court, assisting clients in administrative advocacy before State Water Board and San Francisco PUC, and preparing for dispositive federal and state court hearings.

Stanford Law School

August 2004-December 2004

Lecturer

Taught first year legal research and writing course.

WaterKeepers Northern California, San Francisco

June 2001-June 2004

Program Director January 2003-June 2004

Represented public interest organizations (San Francisco BayKeeper and DeltaKeeper) at administrative hearings regarding health of regional and statewide waterways. Researched and drafted written comments concerning discharge permits, clean up plans, proposed regulations. Coordinated environmental litigation strategy and served as client in enforcement cases. Organized and participated in statewide coalitions to spur change at administrative and legislative levels.

Intern Supervisor June 2001-June 2004

Supervised legal and policy interns, including teaching written and oral advocacy technique to law student interns. Supervised in-house environmental law clinic. Recruited participants. Designed projects that both advanced ongoing litigation and provided stimulating educational experiences for clinicians. Research and writing projects ranged from federal motion to strike expert testimony to analysis of uses of California Fish and Game Code to protect water quality. Provided feedback to improve clinician performance. Supervised fifteen clinicians.

Staff Attorney June 2001 - April 2003

Prosecuted environmental enforcement actions under federal and state laws, including federal Clean Water Act, Proposition 65, B&P Code 17200, CEQA. Assessed relative merits of prospective prosecutions; coordinated motion practice between in-house and outside counsel; negotiated and drafted settlement agreements; oversaw compliance monitoring.

Public Interest Lawyers Group, San Francisco

February 1999 - June 2001

Attorney

Litigated on behalf of public interest, grass roots organizations under Clean Water Act. Researched and drafted motions concerning substantive and procedural issues, assisted drafting appellate motions; drafted CWA 60-Day Notices; propounded and responded to discovery; maintained client contact. Enforced judgments and consent decrees. Defended client in retaliatory declaratory judgment actions.

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EDUCATION

University of California, Los Angeles School of Law

JD

Journals: Environmental Law Journal, Women's Law Journal.

December 1997

University of San Diego School of Law Summer Abroad, Paris

Certificate

International Contracts.

August 1994

University of Pennsylvania

AB

Honors: Degree awarded cum laude, departmental honors.

English Literature

Wrote honors thesis analyzing role of mother as icon in Joyce's *Finnegans Wake*.

May 1993

REPRESENTATIVE PUBLICATIONS AND PRESENTATIONS

Lazerow, Shana Once Adequate, Always Adequate - The Courts Are Getting the Clean Water Act Notice Requirements Right. Hastings West-Northwest Journal of Environmental Law and Policy, Volume 9, No. 2.

University of Oregon, Public Interest Environmental Law Conference

March 2010, March 2012

Panelist Stemming the Flow – Addressing New Gas Power Plants; Transitioning to Renewables

Environmental Law Section of the California Bar Conference at Yosemite

October 2011

Panelist CEQA Year in Review

University of California, Berkeley School of Law

October 2010

Guest Lecturer Environmental Justice as a Legal Career

Law Seminars International California Environmental Quality Act Conference

August 2010

Panelist "Baseline Determinations Following CBE v. SCAQMD"

Clean Power, Healthy Communities

February 2010; May 2012

Presenter "Stopping Dirty Energy"; "Solar for All"

University of Oregon Public Interest Environmental Law Conference

March 2008

Panelist "Lawyering for Environmental Justice and Social Change"

New College of Law

April 2006

Guest Lecturer Environmental Justice as a Legal Career

State Bar of California 2004 Environmental Negotiation Competition

March 2004

Judge Judged team negotiation competition regarding impacts of a proposed gravel mine alteration.

EarthTeam Student Environmental Leadership Weekend

November 2003

Speaker "Protecting the San Francisco Bay - from Regional Debates to Local Action"

Hastings College of the Law Panel Discussion

January 2003

Panelist "Looking at Clean Water Act Enforcement From a Diversity of Perspectives"

Debated efficacy of Clean Water Act enforcement. Advocated for more effective use of citizen suits.

Golden Gate University School of Law Urban Environmental Law & Policy Seminar

June 2002

Guest Lecturer "San Francisco BayKeeper: Stormwater" -- Private enforcement of water protection law.

State Bar of California 2002 Environmental Negotiation Competition

March 2002

Judge Judged team negotiation competition regarding impacts of a proposed dairy expansion.

SHANA LAZEROW

STATE BAR # 195491

3 COTTAGE ROW SAN FRANCISCO, CA 94115 415.359.1491 lazerow@att.net

SKILLS AND AFFILIATIONS

Member, California State Bar Association, Environment Section.

Fluent French, competent German and Spanish; translated articles from French for kite foundation/archive (1998-99).

Julia E. May

Senior Scientist / Environmental Consultant 510/658-2591 jmay@sbcglobal.net

Experience 1989-present

Industrial Air Pollution & Pollution Prevention Technical Evaluation / Science team manager Identification and quantification of industrial air pollution sources including criteria pollutants, toxics, and greenhouse gases. Identification of pollution prevention methods and engineering solutions for communities facing continuous and episodic chemical releases. Research of best and worst industrial practices, and chemical phase-out methods. Analyzing permitting, emissions and air monitoring data; compiling available health and environmental impacts data. Evaluation of technical basis of regulatory compliance with environmental laws. Working through practical technical issues of regulation, negotiating with industry and government agencies to craft most health-protective policy and regulatory language. Translating inaccessible technical information into lay language and educational materials. Providing technical assistance and cumulative impacts analyses to communities of color that face severe pollution burdens. Assisting communities and workers in developing proposals for environmental health protection regulation, permitting, and policy. Managed four-person science department for statewide environmental organization. Hired by regulatory agency as technical advisor to identify feasible air pollution control methods not previously adopted, and to assist communities submitting comments during regulatory proceedings.

Project examples:

- ffi Evaluation of air emission and other impacts from proposed permits for individual fossil fuel industry expansions including refineries, oil drilling, pipelines, and coal gasification: Evaluation of refinery emissions and solutions regarding permitting of feedstock switches to Canadian tar sands crude oil at ConocoPhilips Wood River, BP Whiting, Detroit Marathon, and proposed new MHA Nation, North Dakota, refineries, as well as dozens of refinery expansions in Northern and Southern California. Evaluation of oil drilling operations, air impacts, public safety hazards, earthquake and subsidence hazards, public nuisance hazards and solutions in residential neighborhood. Evaluation of pipeline transport impacts of crude oil, hydrogen, and other oil industry feedstocks in California and Midwest. Evaluation of coal gasification plant emissions. (1990s to present)
- ffi Development of model California oil industry criteria pollutant regulation, and proposed greenhouse gas regulation and alternatives analysis: Developed multiple proposals ultimately adopted for addition to ozone attainment plans in Northern and Southern California of model oil refinery regulations for flares, pressure relief devices, tanks, leakless fugitives standards, petroleum product marine loading, and others. Technical working group member in State of California regulation of greenhouse gas and copollutants. Developed recommendations for regulation of oil industry greenhouse emissions, sources, alternatives, and reporting; the State found these feasible and recommended regulation. (1990s to present)
- ffi Evaluation of emissions and phaseout opportunities for smaller industrial sources including metal finishing, foam manufacturing, wood finishing, electronics, consumer products, etc.: Evaluation of air emissions and unnecessary use of ozone depletors, carcinogens, and reproductive toxins, direct negotiation with individual companies to identify specific chemical elimination options in lieu of penalties for environmental violations. For example, metal degreasing was replaced with benign alternatives (soap and water) or grease use eliminated, by talking through use with manufacturers. Phaseout of chemicals was over a million pounds of various substances from many sources. (1990s)

Education

1981

B.S. Electrical Engineering, University of Michigan, Ann Arbor Engineering principles, mathematics, thermodynamics, physics, materials science, chemistry, electronic circuit design, solid-state physics, and others.

Positions

2004- present

Independent Environmental Consultant (2004 - ongoing) and Senior Scientist, Communities for Better Environment (2006 - present) -- Industrial pollution quantification, including analysis of proposed and existing industrial permits. Analysis of impacts and solutions to environmental problems including trends in oil industry crude feedstocks, associated equipment changes, emissions of criteria pollutants, toxic emissions, and greenhouse gases. Technical consultant and strategist in community campaigns on industrial regulation and pollution prevention. Geographic areas include Southern California, Northern California, and multiple U.S. states.

2001-2003

Statewide CBE Lead Scientist, CBE, Oakland, CA

Responsible for accuracy and strategic value of CBE's technical evaluations within community and environmental law enforcement campaigns, also led statewide technical staffing. Identified underestimations in electrical power plant expansion air emissions in a community of color which had very high asthma rates; identified alternatives option including sufficient conservation, clean energy generation, and transmission available to prevent need for fossil fuel expansion, documented facts in California Energy Commission proceedings. Analysis of and recommendations on adding regulation to Bay Area Ozone Attainment Plan (concerning flares, pressure relief devices, wastewater ponds, storage tanks, and others) which were ultimately adopted. Evaluated Environmental Impact Reports and Title V permits for refineries and chemical plants; identified emissions, potential community impacts and alternatives. Successfully assisted negotiating Good Neighbor Agreements by identifying technical solutions to environmental violations to bring facilities into compliance.

1990-2001

Clean Air Program Director, Northern California Region, CBE

Analysis of permits, regulation, air pollution inventories and other emissions information for oil refinery, power plant, cement kiln, smelter, dry cleaner, consumer product, lawn mower, mobile source, and other air pollution sources, neighbor and worker health impacts, with pollution prevention policy development. Successfully advocated for national models of oil refinery regulation. Evaluated and documented root causes of industrial chemical accidents as part of community campaigns for industrial safety. Technical assistance to community members negotiating Good Neighbor Agreements with refineries. Successful advocacy for adoption of policies eliminating ozone depletors in favor of benign alternatives.

1987-1990

Research Associate, CBE

Led successful campaign working closely with maritime workers and refinery neighbors for adoption of strict oil refinery marine loading vapor recovery regulation, which became statewide and national model. Member of technical working group at BAAQMD evaluating emissions, controls, safety, and costs. Also analyzed school pesticide use and won policy for integrated pest management on school grounds.

1986

Assistant Editor of appropriate technology publication, Rain Magazine, Portland, OR Production of publication on innovative environmental success models around the U.S. and the world. Compiled, co-edited, wrote, and provided production for non-profit publication.

1981-1985

Integrated Circuits Design Engineer, National Semiconductor Corp., Santa Clara, CA

Electronics engineering design team member for analog-to-digital automotive engine controls for reducing air emissions. Troubleshooting hardware and evaluating fault-analysis software efficacy.

A few special activities

2002-2003

Roundtable on Bay Area Ozone Attainment Progress

Invited member of problem-solving group of decision makers including BAAQMD board members, City Council members, industry CEOs and trade group directors, California Air Resources Board (CARB) and US EPA officials, and others, for reviewing progress and proposing action to control San Francisco Bay Area regional smog.

1995-2003

Negotiator for Optical Sensing Air Pollution Monitoring Equipment on oil refinery fenceline CBE signatory to enforceable Good Neighbor Agreement with Rodeo, California oil refinery, providing technical analysis for community negotiators, resulting in permanent installation of a state-of-the art air pollution monitoring system on the refinery fenceline, using optical sensing to continuously measure air pollution and broadcast data to a community computer screen. Researched and reviewed manufacturer specifications, developed Land Use Permit language, and worked with refinery and manufacturer for better Quality Assurance/Quality Control. Worked with US EPA, Contra Costa County, and community groups evaluating the system and publishing report evaluating monitoring of emissions.

1998-2002

Program Administrator for Bucket Brigade air pollution monitoring. Coordinated community groups of Contra Costa County Bucket Brigade project (funded by US EPA) who carried out training events in several communities surrounding major Bay Area refineries and chemical plants. The Bucket Brigade used low-tech air pollution monitors community members can build and operate, based on a standard air pollution sampling tedlar bags analyzed at certified laboratories. Provided community information on laboratory results, administered complex federal grant including quality assurance plan.

1997

Installation of Photovoltaic Panels, Solar Energy International, Colorado. Completed practical training on solar energy system design and installation for general electrical energy uses including water pumping, house cooling, etc, and applying energy conservation principles.

1993

Chemistry of Hazardous Materials course, U.C. Berkeley Extension, for environmental professionals

Publications and written comments (examples)

- California statewide Oil Refinery Sector GHG emissions and recommendations, technical comments submitted to
 the State of California on refinery greenhouse gases statewide, entitled: Recommendations on AB 32 Scoping Plan
 on Corn Ethanol Refineries, Electricity Generation, and Oil Refineries from Environmental Justice Organizations,
 by Communities for a Better Environment (CBE), the Environmental Health Coalition (EHC), the Association of
 Irritated Residents (AIR), and the Center on Race Poverty and the Environment (CRPE), May 2008.
- 2. Evaluations of major oil refinery expansions and crude switch modifications at various U.S. refineries: Comments on ConocoPhillips Wood River CORE Project (Coker and Refinery Expansion), New Source Review Permit Application, Comments on BP Whiting Significant Source Modification No.: 089-25484-00453 and Significant Permit Modification No.: 089-25488-00453, Comments on DEIS for Mandan, Hidatsa and Arikara Nation's Proposed Clean Fuels Refinery Project, providing detailed evaluation of a new refinery proposed to be sited without air permits on MHA Nation reservation, among others. CBE's Comments on Chevron Refinery Draft Title V Permit, September 27, 2002, Julia May and Will Rostov, (documenting extensive inadequacies in voluminous Chevron operating permits under Title V of the Clean Air Act).
- 3. Reports on California refinery sources: The Increasing Burden of Oil Refineries and Fossil Fuels in Wilmington, California and How to Clean them Up, a report including information on oil industry concentration in Southern California, trends in heavy crude oil use, and local oil drilling issues, April 2009. Refinery Flaring in the Neighborhood, Report on Refinery flaring in the San Francisco Bay Area, the need for new regulation and better law enforcement, and the community campaign to get there, CBE, Julia May, February 2004
- 4. Optical Open Path Monitors at the Tosco San Francisco Refinery at the Rodeo Fenceline, May 2001, coauthors Julia May (CBE), Elinor Blake, Jim Gallagher, Randy Sawyer (Contra Costa County Health Services), Andy Mechling, Kasha Kessler, and Sandra Dare, (Shoreline Environmental Alliance, SEA), with assistance from US EPA Region IX, and advisory committee made up of the BAAQMD, Cal/EPA, California Dept. of Health Services, Occupational Health and Environmental Health Branches, and the Tosco Rodeo Refinery (now Phillips)
- 5. Evaluation of Ozone Attainment Plans: For example: These Readily-Available Stationary Control Measures should be included in the Bay Area Clean Air Plan, 5/14/2001, to Celia Bloomfield, Planning Office, [AIR-2], Air Division, U.S. Environmental Protection Agency, Region IX, CBE, Julia May, and CBE Comments on the BAAQMD/MTC/ABAG Proposed Final 2001 Ozone Attainment Plan (June 2001 version, July 16, 2001, to Chairperson Randy Attaway and Members of the Board, Bay Area Air Quality Management District (BAAQMD), Richard Toshiyuki Drury, Julia May