CIBO BOILER MACT LITIGATION UPDATE

LISA M. JAEGER
BRACEWELL & GIULIANI
MARCH 13-14, 2012

- March 21, 2011 Rules
 - DC Circuit
 - BMACT, CISWI, Area, NHSM cases in abeyance
- Delay Notice (EPA Notice delaying effective dates of BMACT and CISWI Rules)
 - DC District Court vacated Delay Notice January 9, 2012
 - DC Circuit case in abeyance
- Completion Case (EPA Notice that CAA §112(c)(6) obligations complete)
 - DC Circuit
 - Briefing through Spring 2012
 - Oral Argument Summer 2012?
- Spring 2012 Reconsidered Rules will be challenged