

JACKSON & CAMPBELL, PC
Multiple Sites in Texas, California, Washington, Indiana, and New Jersey

Technical Environmental Consulting and Litigation Support

Jackson and Campbell, PC retained Geolex, Inc. (Geolex) and Alberto A. Gutiérrez as principal in charge on behalf of their client, AIG, to evaluate releases and associated remedial investigation and remedial action implementation costs associated with various RSR Corporation lead smelter facilities throughout the United States. These sites, located in Texas, California, Washington State, Indiana, and New Jersey, included facilities that had an over 70-year history of lead smelting operations and associated environmental impacts.

Geolex was tasked to evaluate the causes for the environmental contamination resulting from these facilities and to determine whether this contamination resulted primarily from sudden and accidental occurrences versus routine operating practice. As part of this evaluation, Geolex performed extensive historical aerial photography analysis to evaluate the types and timing of air quality control devices emplaced at the facilities. In addition, Geolex did detailed ICSCT air modeling to determine the extent and magnitude of environmental impacts associated with accidental releases and normal operations at the facilities. The effort included an evaluation of remediation technologies and remediation costs associated with the cleanup of a variety of soil and groundwater contamination problems associated with the facilities and with waste disposal conducted by RSR at non-owned facilities.

Mr. Gutiérrez provided expert testimony in two depositions related to this case. After approximately two and a half years of effort, this case was settled favorably prior to commencement of trial.

Major Project Elements:

- Aerial photography
- Air modeling
- Litigation support
- Hydrogeology
- Remedial design
- Remedial cost investigation
- CERCLA
- RCRA
- Expert witness testimony