

# ENVIRONMENTAL NOTES

May 2018

## CLEAN AIR ACT NEW SOURCE REVIEW IN 2018: RE-THINKING YOUR STRATEGY FOR COMPLIANCE

BY: LIZ WILLIAMSON

New Source Review (“NSR”) remains a focus of enforcement for EPA. Between last year and now, EPA finalized eight settlements with manufacturers and one with a utility, asserting NSR violations for allegedly not obtaining a pre-construction permit before making physical or operational changes to the plant. The industries covered by the settlements were petroleum, carbon black, and glass manufacturing.

Guidance issued by EPA in December, 2017 addressed the Trump Administration’s approach on NSR enforcement and provided industry with a clear roadmap (the “December Guidance”). The December Guidance said that EPA will not

second-guess actual-to-projected-actual emissions analyses for projects unless there is “clear error.” Instead, the enforcement focus will be on emissions during the five or ten-year recordkeeping or reporting period after the project is completed.

The most recent guidance issued by EPA addresses how a source conducts an emissions analysis (the “March Guidance”). The March Guidance departs from previous EPA decisions by allowing a project’s emissions decreases to be credited against emission increases in the first step of the NSR analysis. If the project’s overall emissions profile is not over PSD significance thresholds, then netting is not required. The March Guidance simplifies the complexities of the NSR analysis and is expected to reduce the length of the permitting process.

EPA’s shift in NSR enforcement focus is instructive in three ways when considering your NSR litigation risk-avoidance and plant project strategy this year:



- When in doubt, do an emissions analysis. The December Guidance means EPA will give your facility deference as long as the facility documents that it examined the project in a way that is consistent with the NSR regulations. EPA has signaled that it is not in the business of agreeing or disagreeing with judgment calls on emission factors, capacity factors, and exceptions (e.g., routineness) used in the emissions analysis.
- Consider tracking and analyzing post-project emissions of your facility. EPA has stated that it plans to evaluate NSR enforcement opportunities on the basis of actual emissions. Companies must submit emissions data to EPA to comply with various other Clean Air Act programs. Companies would be well-served to determine if emissions are trending upwards on an annual basis, such that enforcement risk might increase. If an analysis identifies an upward emissions trend, the reasons for that trend should be examined and documented. Many other

variables exist that could influence emissions that are not related to a plant improvement.

- Consider doing plant efficiency improvements. Emission reductions can be credited against increases, simplifying the permitting process.

Companies enthusiastic about the December and March Guidance documents should be wary because the favorable policies they established can be reversed just as easily as the Trump EPA put them in place. For example, a new President in 2020 can revert back to the Obama Administration's policy of pursuing enforcement without waiting for five or ten years of emissions after the project. With respect to the December Guidance, companies should be mindful of environmental groups, which still pursue alleged NSR violations through citizen suits and Title V permit objections. Companies should continue to ensure that actual-to-projected-actual analyses contain accurate, defensible emissions estimates as prescribed by 40 CFR § 52.21.

Another variable is NSR reform. EPA has identified NSR reform as a priority and has created a task force to review reform opportunities. Meanwhile, Congressman Griffith from Virginia introduced H.R. 3128 on June 29, 2017 to make changes to NSR regulations. H.R. 3128 proposes to define that a “modification” to a unit for NSR purposes would be based on the much less stringent hourly emissions rate test rather than the actual-to-projected-actual test required by 40 CFR § 52.21. The bill is presently in the Committee on Energy and Commerce. That Committee held a hearing on February 14, 2018 to start the NSR reform discussion. Prominent speakers for industry, states, and environmental groups spoke to Committee members concerning the general concept of NSR reform, including whether it is advisable, the utility of the NSR program generally, and specific ideas for improvements. It is unclear whether reform efforts will be successful. We will be monitoring progress and gauging the impact of these reform efforts on facility compliance.

“New Source Review Preconstruction Permitting Requirements: Enforceability and Use of the Actual-to-Projected-Actual Test in Determining Major Modification Applicability” (Memo from Scott Pruitt, December 7, 2017).

“Pruitt signals ‘task force’ could inform NSR reform push,” (Inside EPA, September 21, 2017).

February 14, 2018 Hearing on “New Source Review Permitting Challenges for Manufacturing and Infrastructure” at <https://energycommerce.house.gov/hearings/new-source-review-permitting-challenges-manufacturing-infrastructure/>

“Project Emissions Accounting Under the New Source Review Preconstruction Permitting Program” (Memo from Scott Pruitt, March 13, 2018).

## FIVE QUESTIONS EVERY INDUSTRIAL FACILITY SHOULD ANSWER BEFORE APPLYING FOR A PRETREATMENT PERMIT

BY: RYAN W. TRAIL

Dischargers of industrial wastewater face a complex and nuanced set of federal, state, and local regulations aimed at protecting the water bodies into which they discharge. Industries discharging to local Publicly Owned Treatment Works (POTWs) are often required to obtain an Industrial Pretreatment Permit. This permitting process can be difficult to navigate, but planning and proper analysis of your facility and applicable regulations can help make it tolerable. Below are five important questions every facility should answer before applying for a pretreatment permit.

### Where do you fit?

Federal regulations establish uniform national standards applicable to specific industrial categories for pretreatment of wastewater. These effluent limitations -- called Categorical Pretreatment Standards -- are technology-based and will be included in your Pretreatment Permit. Each Categorical Pretreatment Standard is intended to represent the greatest pollutant reductions economically achievable for an industry. There are 58 categories, regulating everything from the dairy industry to steel manufacturing. Within each industry category are subcategories.

It's important for you to determine precisely what category and subcategory apply to your facility. Subcategories are often very similar in scope to another subcategory, but contain dramatically different limits. For instance, within the Textile

Manufacturing category, subcategories of Wool Scouring and Wool Finishing have significantly different daily maximum BOD limits (10.65 kg and 22.4 kg respectively). Even subtle variations in the type of business conducted can result in much different permit limits. Be diligent in ensuring your application specifies the correct category and subcategory and in ensuring the permitting authority doesn't mistakenly classify your facility as something it is not.

### **Are you fundamentally different?**

Even if an applicant fits squarely into a Categorical Pretreatment Standard, if it can show the facility and its discharge have factors that are fundamentally different from those considered by EPA when developing the standard, the applicant may be eligible for a variance from those standards. For example, if the nature of the pollutants in the discharge or the volume of the discharge is uncharacteristic of the industrial category, an applicant may apply for a fundamentally different factor variance. Also, if the facility has unique treatment technologies not typically used in the industry, a variance may be possible.

### **Are you a Significant Industrial User?**

Many sewer use ordinances require a pretreatment permit only if the applicant is considered a "Significant Industrial User" (SIU). If the applicant will discharge below a certain threshold volume of wastewater (typically 25,000 gallons/day) or contribute less than a certain percentage capacity of the treatment plant (typically 5%), it may not be an SIU. In these instances, many POTWs will accept wastewater from a facility under a less formal arrangement, such as a Letter of Acceptance. An important distinction here is that all applicants covered by a federal Categorical

Pretreatment Standard are automatically considered SIUs.

### **Are you eligible for removal credits?**

Another potential variance from strict Categorical Pretreatment Standards exists for facilities discharging to a POTW where the POTW has technologies already in place to remove the type of pollutant found in the facility's discharge. This variance is called a removal credit. If the POTW can achieve consistent removal of the pollutant and if granting the credit would not cause a violation of its own permit, the POTW may give a facility a removal credit for as much as the POTW's consistent removal rate of the pollutant. This variance could potentially save a facility significant expense it would otherwise incur in pretreatment costs.

### **Does the POTW have a full understanding of your discharge?**

It is important the POTW has a complete and accurate understanding of an applicant's processes and waste streams. Most POTW's have detailed permit application forms, where vital information regarding a facility's discharge must be provided. The application typically contains a detailed description of the facility's manufacturing activities, along with a list of raw materials and process chemicals used, as well as the products produced. Full disclosure in this portion of the application ensures the POTW can precisely anticipate the nature of pollutants in the discharge. The application



also typically contains operational characteristics, such as whether the facility discharges continuously or in batches, and whether there are seasonal variations or scheduled shutdowns. This information ensures the POTW can anticipate the correct volume of wastewater from the facility. Knowing the nature of the pollutants in a facility's discharge and the expected volume of wastewater helps POTWs plan for treatment and ensures there are no surprises.

By asking and answering these questions early in the permitting process, you can avoid receiving an unreasonable permit and mitigate the risk of unexpected violations down the road.



**COURTS AND EPA CONTINUE TO DEBATE ROLE OF GROUNDWATER IN CLEAN WATER ACT JURISDICTION AND NPDES PERMITTING**

BY: HENRY R. "SPEAKER" POLLARD, V

EPA recently announced that it is seeking comments on how to address one of the more vexing issues involving EPA's jurisdiction under the Clean Water Act ("CWA"): whether discharged wastewater or stormwater that passes through groundwater before reaching regulated surface waters is subject to permitting under the CWA's National Pollutant Discharge Elimination System ("NPDES") program. As noted in our past newsletters, this is not a new concern, and evolving

court decisions do not suggest any consensus. (See the January and May, 2017 editions at <http://www.williamsmullen.com/environews>.) EPA has now decided to reexamine whether this groundwater "pass-through" effect may serve as a basis for NPDES permit applicability.

Under the CWA, "the discharge of any pollutant" is generally prohibited unless it is authorized by a permit or otherwise allowed by the CWA. The CWA defines "discharge of pollutants" as "any addition of any pollutant" from a point source to navigable waters, waters of the contiguous zone or the ocean. The term "navigable waters" is defined in the CWA as "waters of the United States, including the

territorial seas," which, in turn, is defined by NPDES regulations to include certain surface water features and wetlands, but not groundwater. A point source is "any discernable, confined and discrete conveyance . . . from which pollutants are or may be discharged." Examples include a pipe, ditch, lagoon, or well, among other devices or features. Typical diffused or fractured geologic formations containing groundwater do not readily constitute a "discernable, confined and discrete conveyance." Thus, a discharge of pollutants to groundwater before reaching jurisdictional waters would not appear to be an addition of pollutants to "waters of the United States" – at least not directly – and so would not appear to be a regulated discharge subject to NPDES permitting. However, EPA guidance opines that groundwater pass-through situations may trigger NPDES permit requirements

or violations where there is a “direct hydrological connection” in the groundwater between a discharge’s point source and “waters of the United States.” (Note that state NPDES programs must be at least as stringent as EPA’s, so they generally follow EPA’s lead here.) These are fact-specific situations involving a variety of hydrogeological and evidentiary factors.

Federal courts continue to address this issue with some varied and significant recent developments. Following the federal district court in *Sierra Club v. Virginia Electric & Power Company* adopting EPA’s policy related to seepage from a coal ash pond in Virginia (see the May 2017 newsletter), a Tennessee federal district court followed suit. A Kentucky federal district court went the opposite way, holding that no NPDES permit was required for coal ash pond seepage into regulated waters via groundwater. More recently, two federal circuit courts have ruled on the issue, creating an apparent and significant split among at least four federal circuit courts as to how far NPDES jurisdiction extends into and through groundwater to traditional regulated surface waters.

First, in *Hawai’i Wildlife Fund v. County of Maui*, the U.S. Court of Appeals for the Ninth Circuit held that the plaintiffs only needed only to show that “the pollutants are fairly traceable from the point source” through the groundwater to the receiving regulated waters to demonstrate an unpermitted discharge. The court said it was “of no import” that the pollutants had to travel from the point source (here,

wastewater injection wells releasing to groundwater) through groundwater to reach regulated surface waters (here, ocean waters). “To hold otherwise would make a mockery of the CWA’s prohibitions.”

Second, in *Upstate Forever v. Kinder Morgan Energy Partners, L.P.* – a case concerning a pipeline spill in South Carolina – the Fourth Circuit recently ruled that spilled petroleum travelling via groundwater to nearby regulated surface waters is indeed subject to the CWA’s prohibition of a discharge without an NPDES permit. Deferring to EPA’s policy and overturning the lower district court decision, the Fourth Circuit held that NPDES permits are required for pollutants discharged from

a point source indirectly to regulated waters where there is a “direct hydrological connection” between the two. Importantly, the Fourth Circuit took this position even though the release had been stopped, ending the actual discharge and arguably ending any ongoing violation necessary for

a citizen suit under CWA as brought in this case. Even though the activity causing the violation had ended, the court opined that the violation itself had not necessarily ended due to alleged continuing migration of the residual contamination plume.

Energized at least in part by the earlier varying caselaw, and in tandem with the pending Clean Water Rule designed to redefine “waters of the United States,” EPA issued a public notice in February seeking comment on how best to address the groundwater pass-through effect in relation to CWA jurisdiction and NPDES permitting decisions. Comments are due by May 21, 2018. In



particular, EPA seeks input on (i) whether or how the groundwater pass-through effect fits within the CWA's text, structure and purposes addressing prohibited discharges and discharge permitting; (ii) whether such discharges are sufficiently addressed or should be addressed through current state law and programs or through different federal regulatory programs and permitting requirements; (iii) whether EPA should amend or clarify its prior guidance and policy statements concerning such discharges to offer increased certainty to regulated parties and the public or to specify the sort of hydrologic connectivity that does (and does not) trigger NPDES permitting obligations; and (iv) if changes to current policy are needed, in which form and by what process should EPA pursue such changes (e.g., memoranda, guidance, or rulemaking).

Even as EPA seeks greater clarity on these issues, these recent cases tend to advance application of the NPDES program where groundwater is involved, increasing uncertainty for regulated parties. In addition, any action by EPA to clarify or modify its existing policy through further interpretive guidance or even regulation is likely to face mixed reviews from stakeholders and could be challenged by parties dissatisfied with any changes that are made. The bottom line is that regulated parties are likely to face continuing uncertainty over these issues until they are presented to and decided by the U.S. Supreme Court.

*“Clean Water Act Coverage of ‘Discharges of Pollutants’ via a Direct Hydrologic Connection to Surface Water,”* 83 Fed. Reg. 7126-7128 (Feb. 20, 2018).



*Sierra Club v. Va. Elec. and Power Co.*, 247 F. Supp. 3d 753 (E.D. Va. 2017); *Tennessee Clean Water Network v. Tennessee Valley Authority*, 273 F.Supp.3d 775 (M.D. Tenn. 2017); *Kentucky Waterways Alliance v. Kentucky Utilities Co.*, No. 5: 17-292-DCR, 2017 WL 6628917 (E.D. Ky. December 28, 2017); *Haw. Wildlife Fund v. County of Maui*, 886 F.3d 737 (9th Cir. 2018); *Upstate Forever v. Kinder Morgan Energy Partners, L.P.*, No. 17-1640, WL 1748154 (4th Cir. Apr. 12, 2018).

## EPA KEEPS LANDFILL METHANE RULES IN PLACE . . . AT LEAST FOR THE MOMENT

BY: JESSICA J.O. KING

Municipal solid waste (MSW) landfills receive non-hazardous waste from residential properties, commercial businesses, and institutions. When MSW is placed in a lined landfill and covered, it decomposes and emits a gas into the air which contains carbon dioxide and methane. According

to its website, EPA considers methane to be “a potent greenhouse gas with a global warming potential more than 25 times that of carbon dioxide.” In 2016, as part of President Obama’s Climate Action Plan, EPA took two actions under the federal Clean Air Act (CAA) aimed at reducing methane-rich gas emissions from MSW landfills. First, EPA issued a final rule updating the 1996 New Source Performance Standards (NSPS) for methane gas emissions from new, modified and reconstructed MSW landfills (“Rule”). Second, it issued new guidelines aimed at reducing emissions from existing MSW landfills (“Guidelines”).

The Rule and Guidelines require MSW landfills to measure and capture about 30 percent more landfill gas emissions, including methane, than required under the 1996 rule. The Emissions Rule applies to MSW

landfills constructed or modified after July 17, 2014 with a design capacity of 2.5 million metric tons and 2.5 million cubic meters of waste or more. The Guidelines apply, through EPA-approved state plans or a federal plan, to MSW landfills constructed on or before July 17, 2014 with 2.5 million metric tons and 2.5 million cubic meters of waste or more (unless the landfill closed within 13 months of the Rule and Guidelines publication). The Rule and Guidelines:

- Reduce the threshold upon which a landfill may stop collecting gas from 50 to 34 metric tons per year;



- Require landfills to capture gas by combusting it for energy generation, processing it for sale or re-use, or flaring it;
- Require landfills to monitor surface emissions of methane quarterly at all areas where MSW has been placed;
- Require landfills to have a gas collection system in place unless modeled emissions are between 34 and 50 metric tons per year;
- Landfills who model between 34 and 50 metric tons per year may use alternative site-specific methods (Tier 4 surface monitoring) to determine the need for a gas collection system;
  - Require landfills to monitor temperature and pressure at wellheads on a monthly basis and take corrective action for elevated temperature or positive pressure; and
- Allow landfills to cap or remove landfill gas collection systems from all or part of a landfill after closure and 15 years (or sooner upon showing they are no longer needed) so long as the emissions are less than 34 metric tons per year on three successive tests.

In October of 2016, representatives of the solid waste industry, including the National Waste & Recycling Association (NWRA) and large MSW landfill companies, petitioned EPA to reconsider the Rule and Guidelines and stay their effectiveness



until it could do so. Among other things, the petitioners argued that the Rule and the Guidelines' lower threshold would not provide benefits sufficient to justify the costs and burden. They also argued that some of the compliance standards and timelines are impractical or unachievable.

Shortly after President Trump took office, EPA Administrator Scott Pruitt issued a letter informing the NWRA and the waste industry of a 90-day moratorium on the Rule and Guidelines to allow reconsideration of six issues. Those issues were: (1) surface emission (Tier 4) monitoring; (2) annual liquids reporting; (3) corrective action timeline procedures; (4) overlapping applicability with other rules; (5) the definition of cover penetration; and (6) design plan approval requirements. During the 90-day moratorium, EPA was sued by the Natural Resources Defense Council (NRDC) which argued, among other things, that the agency lack authority under the CAA to delay implementation of the Rule and Guidelines. In September, 2017, the U.S. Court of Appeals for the D.C. Circuit denied NRDC's request to vacate the stay, even though the stay had already expired on August 29, 2017.

Since then, industry groups and environmentalists have been waiting for the results of EPA's reconsideration. In fact, when it issued the 90-day stay, EPA stated it would most likely issue a new proposed rule after reconsideration. However, in late January of 2018, EPA announced it would not continue the stay. EPA's intent in doing so is not clear. Since allowing the stay to expire, EPA stated it will continue to work with states on a path forward but will not demand state implementation plans (SIPs) or prioritize review of SIPS containing the Guidelines. Furthermore, EPA is not actively imposing new compliance deadlines for the Rule and Guidelines. Therefore, state regulators and industry groups remain confused as to: (1) whether

the 1996 or 2016 methane emissions rules and guidelines apply; (2) whether there will be another administrative stay; and (3) when and if EPA will publish a revision to the 2016 Rule and Guidelines.

Confused? Welcome to the world of environmental regulation.

*81 Fed. Reg. 59332 (August 29, 2016)*

*81 Fed. Reg. 59276 (August 29, 2016)*

*Letter from Scott Pruitt to National Waste & Recycling Assoc. and Solid Waste Assoc. of North America (May 5, 2017)*

## NEW APPOINTMENTS MADE AT VIRGINIA DEQ

BY: CHANNING J. MARTIN

Governor Ralph Northam has reappointed David K. Paylor to serve as Director of the Virginia Department of Environmental Quality. Mr. Paylor was first appointed Director by Governor Timothy Kaine in 2006. He was then reappointed by Governor Terry McAuliffe in January 2014 and by Governor Bob McDonnell in 2010. Mr. Paylor has served as Director of DEQ for 12 years, making him the longest-serving Director in the agency's 25-year existence.

A new Deputy Director position has been created at DEQ, and Governor Northam has appointed Christopher Bast to serve in that position beginning June 18. Mr. Bast is presently the Climate Policy Advisor in the City of Seattle, Washington's Office of Sustainability and Environment. He worked for Governor Kaine in constituent affairs and policy from 2006 to 2009 and was the Energy Project Coordinator at the Virginia Department of Mines, Minerals and Energy during 2010. After leaving state government in 2010, Mr. Bast's career has

focused on renewable energy and climate issues. In addition to the Governor's appointments, Director Paylor has made two senior appointments within DEQ. James Golden was appointed Director of Regional Operations (a new position), and all six of DEQ's regional offices will now report to him. Mr. Golden was also appointed Regional Director of DEQ's Piedmont Regional Office. Jeff Steers was reappointed as Director of Central Operations. His responsibilities include overseeing the Divisions of Air, Water Planning, Water Permitting, Land Protection and Revitalization, and Enforcement, as well as DEQ's Pollution Response Program.

## EPA HALTS FINANCIAL ASSURANCE REQUIREMENTS FOR HARDROCK MINING

BY: ETHAN R. WARE

EPA continues to walk-back Obama-era regulations. The beneficiary this time is the mining industry, with EPA stating its intention not to issue a final rule establishing financial responsibility requirements for hardrock mining operations. That rule had been proposed by the Obama EPA just days before President Trump took office.

EPA has authority under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA") to require specific industries to demonstrate they have the financial wherewithal to respond to releases of hazardous substances from their facilities. Specifically, Section 108(b) of CERCLA seeks to minimize the risk that taxpayers will get stuck with unfunded cleanups by authorizing EPA to require certain "classes of facilities" to establish and maintain "financial responsibility" by posting bonds, insurance,

letters of credit, corporate guarantees, or other mechanisms sufficient to remediate any releases of hazardous substances by or from the facility.

The proposed financial responsibility requirements for hardrock mining date back to 2003 when EPA initiated a "120-Day Study" of CERCLA financial responsibility requirements. As a result of the study, EPA suggested financial assurance mechanisms be proposed for "current operating and future risk sites" by 2009. EPA under the Obama Administration expanded the recommendations to include "sites listed on the [CERCLA] NPL before 1990." In a Federal Register "Priority Notice" issued on July 28, 2009, EPA identified the "hardrock mining sector" as the first industry "for which it would... develop financial assurance responsibility requirements." To be conservative, EPA said it was issuing these requirements despite the "impacts of modern Federal and State regulations" that had lessened the risk of unfunded cleanups.

The proposed rule, issued just 11 days before President Trump took office, defined "hardrock mining" facilities as those that "extract, beneficiate, and process metals (e.g., copper, gold, iron, lead, magnesium, molybdenum, silver, uranium, zinc) and non-metallic, non-fuel minerals (e.g., asbestos, phosphate rock, sulfur)." EPA excluded non-hardrock minerals mines such as "sand, gravel, limestone, and stone; oil, oil shale or gas operations; or the mining and preparation of coal" from the list of covered facilities. A regulated hardrock mine would have been required under the proposal to demonstrate financial responsibility for health assessments, releases of hazardous substances, and damages to natural resources from each mining location. EPA proposed a comprehensive electronic registration campaign, as well.



EPA's decision that the rule was "not appropriate" was based on its determination that "modern management practices and modern environmental regulations" reduce the risk of tax-payer funded cleanups, a factor it said was ignored under the proposed regulation. Data EPA cited supporting its decision show that releases identified as a cause of past CERCLA cleanup expenditures are now regulated under the Clean Water Act, Clean Air Act, and Resource Conservation and Recovery Act. As a result, EPA found that mines likely to cause catastrophic releases are no longer in operation. In fact, EPA went so far as to note that the vast majority of CERCLA cleanup costs now being incurred in connection with hardrock mining facilities are to address legacy contamination issues, not releases from mines currently in operation.

The Trump EPA concluded prior data collected for enumerated environmental risks at hardrock mining operations do not support a need for financial assurance. "EPA has reevaluated the administrative record for this rulemaking regarding risk at current hardrock mining operations... and has determined

[the] record does not support the proposed rule and supports, instead, a final Agency action of no rule." This determination was based on an evaluation of the three primary reports the proposed rule relied on to identify risk. According to EPA, all three reports failed to demonstrate a need for a financial assurance mechanism at mining operations.

EPA's decision is good news for the hardrock mining industry. It means the industry no longer faces the imposition of additional costs and regulation for risks that are already minimized through their compliance with environmental regulations.

*83 Fed. Reg. 7556 (Feb. 21, 2018)*

*82 Fed. Reg. 3388 (Jan. 11, 2017)*



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