

Paul Jacobson

Partner

Contact

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Overview

Paul guides businesses through their environmental and workplace safety legal challenges involving the EPA, OSHA, state environmental and workplace safety agencies, and private third parties.

In the environmental context, Paul helps manufacturing, mining, and energy (oil and gas, and renewables) companies understand and comply with federal and state requirements pursuant to the Clean Air Act, RCRA, CERCLA, Clean Water Act, and state corollaries. Paul navigates site remediation challenges under CERCLA and RCRA Corrective Action. He assists companies in responding to agency investigations, information requests, and enforcement efforts, minimizing the distraction and impact of such activities, and creatively resolving penalty actions. Paul works on civil and criminal environmental and toxic tort litigation. He helps clients obtain and renew environmental permits. He assists with reinstatement following federal debarment for environmental matters. Paul helps companies with immediate and long-term responses to environmental disasters, including those that implicate Risk Management Plan and Process Safety Management requirements. Paul also helps clients achieve compliance and respond to challenges with California Proposition 65 product labeling requirements.

In the workplace safety context, Paul assists clients with all stages of OSHA inspections and enforcement, including OSH Review Commission litigation. Paul aims to manage enforcement response in a way that protects company interests but does not monopolize the time of company leadership. Paul has experience defending inspections involving a wide range of OSHA standards, including Process Safety Management, Permissible Exposure Limits, hazard communication, electrical protection, trenching, and robotics guarding.

Paul strives for responsiveness, clear communication, and to be a level-headed partner with clients.

Paul is on the Board of Directors of the Midwest Section of the Air & Waste Management Association. He regularly speaks and writes on environmental health and safety issues. While at the University of Missouri School of Law, Paul served as managing editor of the *Missouri Law Review*.

Education

- University of Missouri – Columbia School of Law (J.D.), *magna cum laude*
- St. Olaf College (B.A.)

Bar Admissions

- Kansas
- Missouri

Court Admissions

- U.S. District Court for the Western District of Missouri
- U.S. District Court for the Eastern District of Missouri
- U.S. District Court for the District of Kansas

Distinctions

- *Missouri & Kansas Super Lawyers*, Rising Star, 2023

Presentations and Publications

- ["The Future of the Exceptional Events Rule,"](#) *Environmental Manager Magazine*, October 2024
- "RMP, Not as You Know It: How to Plan and Respond," Midwest Environmental Compliance Conference, September 2024
- ["EPA's RMP Rule Changes Create Compliance Concerns,"](#) *Industry Today*, May 2024
- "Recent Changes to RMP and PSM," REGFORM Missouri Air Compliance Seminar, November 2023
- "RMP and PSM Are Changing – What You Need to Know," Midwest Environmental Compliance Conference, September 2023
- "Chemical Process Safety Updates," A&WMA Midwest Annual Technical Conference, May 2023
- "OSHA Inspection Management," Midwest Construction Safety Conference, March 2023
- "Intro to Environmental Law," University of Missouri Business School Class, October 2022
- ["EH&S Compliance During COVID-19,"](#) AWMA Midwest Monthly Meeting, September 2022
- "Will You Take OSHA Citations for \$10,000? – Top 10 OSHA Developments of 2022," Spencer Fane WorkSmarts Seminar, September 2022
- ["Real Estate Environmental Considerations CLE,"](#) Plaza Lights Institute, Kansas Bar Association, December 2021
- "Working with Environmental Regulations," Air & Waste Management Association, Midwest Section, 2020 Young Professionals Conference, October 2020
- "Regulatory Review and Forecast," Air & Waste Management Association, Midwest Section, Annual Conference, October 2019
- ["Hazardous Waste Generator Improvements Rule,"](#) Air & Waste Management Association, Midwest Section, Annual Technical Conference, February 2017

Related Experience

- Assisting with wide-ranging aftermath of third-party ethanol plant's improper disposal of solid waste byproducts.
- Counseled mining clients on obtaining air and water permits.

- Obtained dismissal with prejudice of CAA citizen suit against animal feedyard following briefing.
- Successful resolution of RCRA air emission compliance matter with chemical manufacturing plant through voluntary disclosure through EPA's audit policy.
- Successful defense of multi-year RCRA compliance investigation at LQG facility resulting in no enforcement referral.
- Successful defense of specialty chemical manufacturer in workplace fatality involving robotic palletizer with no OSHA enforcement action.
- Successful defense of food manufacturing company involving OSHA investigation following a large explosion and fire in industrial dryer.
- Successful defense of OSHA enforcement case against mechanical, electrical, and plumbing contractor in workplace fatality.
- Successful defense of OSHA enforcement case against bridge construction company involving workplace fatality.
- Represent lead-acid battery secondary lead smelter and battery manufacturing plants, including air, water, and waste permitting and compliance and enforcement matters.