



## Vasiliki Keramida, Ph.D., President & CEO

### EXPERT WITNESS EXPERIENCE

Dr. Keramida has been retained by law firms and financial institutions in hundreds of cases since 1989 to provide technical review and expert testimony in complex environmental disputes. All of the cases in which Dr. Keramida has been involved as an expert have been won at trial (and reaffirmed by Appellate Court, when appealed) or settled favorably on behalf of KERAMIDA's clients.

#### INSURANCE COVERAGE

- Retained by law firms representing insurance companies to provide technical review and expert testimony in numerous cases involving insurance coverage of contaminated properties. Several cases were settled favorably after written expert opinion was submitted.

#### CONTAMINATION/CLEANUP

- Provided technical oversight, support, review and expert testimony in litigation involving cost recovery under CERCLA, for private response actions at a contaminated site. The scope of work included an evaluation of work quality for compliance with QAPP requirements under the NCP, risk assessment, and determination of remedial actions and cleanup standards. The case was tried in federal court and won.
- Retained as an expert witness to provide technical assistance in litigation involving alleged surface water, soils and groundwater contamination from the operational practices of an industrial client. The scope of work included an extensive review of all technical information available, including data generated over a five-year period by the litigants and regulatory agencies, and the presentation of a report documenting the review and conclusions. The case was favorably settled.
- Retained by a law firm to provide technical review and expert testimony in litigation involving the contamination of soil and groundwater by petroleum hydrocarbons at several gas stations.
- Expert witness in litigation involving a proposed multi-million dollar remediation of soil and groundwater contamination from a gas station. The case involved lateral and vertical contamination of an extensive aquifer with BTEX and chlorinated solvents, and the contamination of residential drinking water wells. Provided technical expertise regarding the age, source, and extent of contamination; remediation requirements and costs; and cleanup standards. The case was won both in jury trial and on appeal.
- Expert witness in litigation involving petroleum contamination of an industrial property, the source of the contamination, and remedial costs. The case involved several adjacent properties with past petroleum concerns. The case was settled after the technical review was presented.
- Technical assistance and expert testimony provided in a case involving the releases of petroleum into sewers from spills at a gas station and alleged impacts on indoor air quality in neighboring homes. The case was settled after a technical review was performed.
- Expert witness in litigation involving a Superfund site; provided technical review of the funds required for remediation and the timing constraints of the remedy. The case was tried and won.
- Expert witness in litigation involving the soil contamination of a petroleum bulk terminal: Dr. Keramida provided expert testimony regarding the source and extent of contamination, remediation requirements and costs, and cleanup standards. The case was favorably settled.
- Expert testimony and technical assistance in a cost recovery action involving petroleum contamination, including an assessment of the age, source and extent of the releases. The case went to trial and was won.

- Expert witness in litigation involving petroleum contamination from a gas station. Testimony was presented challenging the adequacy of the remedial design, the remediation performance, and the timing of completion. The remedial design was amended as a result of Dr. Keramida's expert testimony, and the case was won at trial.
- Expert witness in litigation involving contamination of soils at industrial facility from alleged petroleum releases through storm sewers. The case was favorably settled after deposition.
- Expert witness in litigation involving the contamination of soils at a petroleum bulk terminal. The issues involved the age and source of the releases and the appropriateness of proposed remedies. Dr. Keramida's testimony demonstrated that the one-million dollar proposed cleanup was not needed, and the case was favorably settled during mediation proceedings.
- Expert witness in litigation involving petroleum contamination from leaking USTs. The case involved the determination of the source of contamination and the evaluation of possible pathways of migration of contamination from off-site sources. The case was favorably settled.
- Expert witness in litigation involving the contamination of a large closed manufacturing facility. The issues included the source and extent of contamination, and appropriate remedies. The case was favorably settled and KERAMIDA is overseeing the remedial activities.
- Expert witness in litigation involving contamination at an old gas station, and the determination of remedial requirements. The case was favorably settled after the issuance of Dr. Keramida's report.
- Expert witness in litigation involving previous contamination at a gas station, and the presence of petroleum vapors inside the building constructed at the property after the closing of the gas station.
- Expert witness in litigation involving the groundwater contamination of private properties from releases of gasoline at a gas station and the migration of BTEX vapors into the homes. The issues include vapor migration pathways, soil vapor modeling, toxicology of benzene, health impacts of benzene, and required short-term and long-term remedies.

## **SURFACE WATER**

- Retained by a law firm representing a major petroleum pipeline company to provide technical assistance and expert testimony in litigation involving water quality issues concerning an NPDES permit and the hydrogeologic relationship between groundwater discharge and stream flow.
- Retained by a law firm to provide technical comments and testimony in the appeal of an industrial NPDES permit. Dr. Keramida's testimony resulted in the state agency withdrawing the draft permit and denying issuance of the permit.
- Dr. Keramida's testimony to a zoning board, on NPDES and other surface water issues, resulted in the successful granting of the requested siting for a steel mill.
- Retained by a law firm to provide technical assistance in a major fish kill case that included both civil and criminal charges. On behalf of the accused industrial discharger, KERAMIDA provided an extensive investigation of the fish kill, including the circumstances of the fish kill, river studies, fish sampling and cause of death determination, breakdown of chemicals in surface waters and modeling of dispersion. The technical review included an extensive evaluation of POTW operations and the presence of toxic compounds in sewers. The case was settled. A secondary insurance coverage case is pending.
- Retained by a law firm to provide technical assistance and expert testimony in a case involving the filing of a lawsuit by U.S. EPA against an industry for alleged stormwater and pretreatment violations.

## **HEALTH AND SAFETY**

- Expert witness in litigation involving the exposure of a worker to a release of mercaptans. KERAMIDA provided an assessment of the appropriateness of the standard of practice of disassembling chemical storage tanks, the dispersion of the compounds through air modeling, and the health effects of the compounds. The case was won in a trial by jury.

## **AIR**

- Retained by a law firm representing a foundry to provide technical assistance and expert testimony in a case where it was alleged that the foundry contaminated the soils of surrounding properties with lead from its air emissions.

## **SOLID WASTE/LANDFILLS**

- Case involving the appeal of an ash landfill permit: KERAMIDA performed extensive technical research of the area, which had a highly complex hydrogeology, and prepared a report about the hydrogeologic characterization of the resource recovery ash monofill site and its relationship to the surrounding land within a five-mile radius. The case was favorably settled and the permit was issued.
- Provided technical review and expert testimony in litigation involving RCRA violations. KERAMIDA performed a characterization of the hazardous waste, and an assessment of the contamination of a 60-acre landfill by deposition of wastes, and the remediation cost. The case was favorably settled after deposition.
- Retained by a law firm to provide expert testimony in a case involving the alleged impact of a landfill on an adjacent private property. The case was settled.
- Retained by a law firm to provide technical assistance and expert testimony in a case involving the valuation of an operating municipal waste landfill. The case was favorably settled.

## **OTHER**

- Dr. Keramida assisted with the liability assessment of an abandoned manufacturing company for a major potentially responsible party in a state "superfund" action. KERAMIDA reviewed recommendations by other consulting firms regarding the environmental assessment of USTs and contamination of soils and groundwater, and prepared a technical report.
- Retained by a law firm to evaluate the cost of demolishing contaminated structures in a performance bond case. The case was favorably settled.
- Retained by a law firm, in litigation involving the cost recovery for remedial work, to evaluate the quality of work conducted and the reasonableness of costs incurred in a major petroleum spill cleanup. The case was favorably settled.
- Expert witness in litigation involving cost recovery for remedial work performed by a contractor. The case was settled after technical review was performed.
- Expert witness in litigation involving the cost recovery for remedial work performed by a contractor. The case was settled.
- Expert witness in litigation involving the adequacy of an environmental site assessment (Phase I) performed by a consulting firm at an industrial site. The case was favorably settled after deposition.

### **Examples of Cases**

Steve E. Schmitt, et al. v. Whirlpool Corporation, et al.

Bowens et al. v. 7-Eleven, Inc., et al.

Blue River Services, Inc. v. Texaco, Inc., et al.

Hightshue v. Roberts Pipeline Construction Company, Inc.

Mears v. Alt Witzig

Indiana Gas et al v. Aetna Casualty, et al.

Hydro Conduit Corp. v. Overnite Transportation Co.

Meyer v. Shell, et al.

NRC Corp. v. Amoco

Blue Lake v. Chrysler

Hoosier Limited Partnership v. State of Indiana, Sunoco (R&M), Hahn Oil Co., et al.

Sara Lee v. Prudential Insurance Co.