

# **Curriculum Vitae**

Patrice S. Miller, ACEDS

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## **EXPERTISE:**

- Evidence Identification and Compilation for Superfund Liability Cases
  - Allocation Research and Development
  - Records Organization and Management for Pre-Litigation and Trial
  - Electronic Discovery Case Management Planning and Support
  - Environmental Practices and Compliance History Research and Documentation
  - Corporate Succession Research and Identification
  - Facility History Research
  - Hazardous Waste Statutes and Regulations
  - Engineering Project Management
  - Federal Court Witness/Depositions
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## **EDUCATION:**

Louisiana State University, BS - Mechanical Engineering

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## **LICENSES AND CERTIFICATIONS:**

- Certified Electronic Discovery Specialist - Association of Certified E-Discovery Specialists (ACEDS)
  - OSHA 40 Hour Health & Safety Training
  - Federal Contract Management Certification
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## **WORK EXPERIENCE:**

### **Burnside Environmental Group, LLC** **Dallas, Texas**

Associate of Burnside Environmental Group which works on behalf of clients throughout the United States to provide specialized litigation support services, including assistance with development of legal strategies to avoid or defend against civil or criminal environmental enforcement actions.

### **Aredian** **Dallas, Texas**

Founder and principal of Aredian which provides records identification and management services for legal, technical, and scholarly pursuits. After working with clients to identify information needs, Ms. Miller conducts assessments to understand available resources and researches electronic and manuscript sources, both published and unpublished, at libraries and institutions across the country.

### **Senior Enforcement Officer (Office of Regional Counsel)**

**US EPA Region 6  
Dallas, Texas**

Accomplishments included development of an electronic resource for capture of Regional Counsel's workload across all programs and responsibilities. Provided assistance to the Resource Conservation and Recovery Act (RCRA) Enforcement Section Chief with a politically sensitive case to identify, secure, and analyze contract, permit, and guidance documents; develop facility operational history; and prepare focused information request letters.

### **Senior Enforcement Officer (Office of Regional Counsel, Criminal Enforcement Unit)**

**US EPA Region 6 Dallas,  
Texas**

Accomplishments included development of an electronic index of discovery materials for supporting productions, responses, and trial. Distilled numerous technical documents into summaries for various case activities, including preparation of stipulation requests and identification of potential witnesses. Identified significant documents to facilitate attorney presentations and rebuttals. Through detailed analysis of photographic materials and response action reports, prepared specifications for a detailed scale model to be used as a trial exhibit.

Responsibilities included analysis of records management practices; disposition of case files; and Freedom of Information Act (FOIA) responses. Consulted on data tracking and reporting systems.

### **Senior Enforcement Officer (Superfund Program, Cost Recovery Section)**

**US EPA Region 6 Dallas,  
Texas**

The Cost Recovery Section had as its primary mission to achieve remediation cost reimbursement or to have settling parties perform site remediation. Superfund case work encompasses not only the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), but often involves Clean Air Act, Clean Water Act, and RCRA issues, as well as bankruptcy, corporate, and probate law.

Participated or consulted on more than one hundred Superfund cases, primarily within the state of Texas. Responsibilities included investigation, notice, and negotiation for settlement, preparation of liability cases, development of referrals to the Department of Justice (DOJ), and coordination of post-filing activity. With attorneys, prepared and certified responses to interrogatories and requests for production. Served as fact witness (personal and 30(b)(6)), providing declarations and oral testimony, both in deposition and at trial.

Case highlights include the successful promotion of an unusual pre-filing mediation leading to depositions of former truck drivers, and recovery of all costs at a site scheduled for write-off; the compelling documentation of liability and allocation schema for a pre-1900 wood-treating facility; and the credible refinement of a waste in list and allocation associated with a 1960s era Treatment, Storage, and Disposal facility.

Served as Cost Recovery manager for three months, while maintaining a full case load and continuing to manage the litigation center.

**Program Analyst (Environmental Services Division)**

**US EPA Region 6 Dallas,  
Texas**

For an organizational unit of more than one hundred professional staff, developed and maintained division's processing and record-keeping systems for travel, purchase requests, miscellaneous obligations, contracts, year-end financial closeout, and FTE utilization. Conducted project planning. Served as division writer/editor. Researched, developed, recommended, and implemented division policy. Communicated with internal and external parties to ensure efficacious and enhanced division operations to accomplish Agency goals.

**Aerospace Engineer (Advanced Environmental Control and Life Support Section)**

**US National Aeronautics and Space Administration (NASA) Johnson Space Center  
Houston, Texas**

NASA Engineer working in the development of life support technology for the Space Station. Served as project engineer for the design, development, evaluation, and verification testing of components and subsystems for advanced spacecraft life support systems (LSS). Formulated detailed statements of work and performance specifications for LSS contracts. Evaluated research and development objectives for technical and cost content of LSS contractor proposals; chaired source selection committees; ranked proposals to aid in bidder selection. Documented and presented source selection committee findings, and negotiated contracts with legal and contract staff.

Prepared written reports and made presentations to management. Planned, directed, implemented, and evaluated in-house test programs associated with advanced LSS equipment. Managed contracts totaling in excess of \$6 million, ensuring that LSS contract deliverables were both technically sound and supportive of Agency objectives.

**Engineer (Acoustical and Noise Control Unit)**

**Turner Collie & Braden Engineering  
Houston, Texas**

Joined firm as an Engineer conducting noise control and vibration surveys and designing noise and vibration mitigation approaches. Responsibilities included field reconnaissance, data analysis, report writing, specification writing, and graphics production for noise and vibration control projects of an architectural, environmental, or industrial nature. Created bid package responses, including project scoping and budget preparation. Served as liaison between professional unit and company contract administration, and handled problem resolution.

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**PROJECT EXPERIENCE:**

Participated as member of Superfund National Workgroup for Budget, Planning, and Resource Allocation and Special Accounts.

Participated as member of Superfund National Workgroup for development of draft national model Consent Decree and language for the proposed Cost Recovery Rule.

Creation, design, promotion, or implementation of:

- Superfund Litigation Center;
  - Superfund File Structure;
  - Standardized Records Processes/Procedures;
  - Standardized Discovery Approaches;
  - Records management system functionality for document review, categorization, and indexing memorialization; bulk processing; and metadata extraction;
  - Document management system separate and apart from agency records system, for the housing and management of pre-record, potential evidentiary material;
  - Electronic capture of contract documents;
  - Oversight process for external document review;
  - Adoption of sophisticated software in support of evidence identification and discovery production;
  - Enhanced approach to consistent documentation of investigation efforts and focused contract tasking, among others;
  - EPA Region 6's first Superfund e-discovery production under Federal Rules. Created method, which was upheld in court, to document the records collection process grounded in Sedona Conference guidelines. Prepared declarations regarding discovery, including analyses associated with discovery disputes (discovery about discovery).
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#### **JOB-RELATED HONORS AND AWARDS:**

**EPA** - National Financial Stewardship Award 2013 - awarded by the Office of Administration and Resources Management (OARM)

**EPA** - National Technical Enforcer of the Year, twice - 2002 and 2008 - awarded by Office of Site Remediation Enforcement (OSRE)/ Office of Enforcement & Compliance Assurance (OECA).

**EPA** - National Outstanding Contract Manager 2004 - awarded by the Office of Administration and Resources Management (OARM)

**EPA** - Silver Medal for Commendable Service 2002

**EPA** - Bronze Medals for Commendable Service 1997, 2004 (two), and 2010

**EPA** - Outstanding Performance Awards - 1988 - 2007

**EPA** - Special Act Awards - 1990, 1991, 1993, 1996, 1997, 2006, and 2009

**DOJ** - Superior Achievement Enforcement Award 1998

**DOJ** - Certificates of Commendation 1992, 1997, and 1999.