

**CONTACT**

plibus@vnf.com  
202.298.1897

**PRACTICES**

Air  
Electric  
Litigation & Investigations

**EDUCATION**

George Washington University  
School of Law  
University of California, Irvine

**BAR AND COURT ADMISSIONS**

California State Bar

**PAUL LIBUS**  
**ASSOCIATE**



**Professional Background**

Paul Libus represents vehicle and engine manufacturers on a variety of environmental issues before federal and state agencies, with particular emphasis on the Clean Air Act (CAA). With regard to the CAA, his focus includes compliance with emissions and on-board diagnostics (OBD) regulations, the allocation of state and federal regulatory authority, investigating compliance issues, and assisting clients in enforcement proceedings before the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB).

During his final year at the George Washington University Law School, Paul clerked for the Vehicle and Engine Enforcement Branch of the EPA's Office of Enforcement and Compliance Assurance, where he worked on enforcement actions involving aftermarket defeat devices, proceedings before the Environmental Appeals Board, and self-disclosure matters.

**Representative Experience**

- Experience with various Clean Air Act mobile source issues, including aftermarket tampering and defeat devices, imports, and federal preemption.
- Drafted litigation-related documents, including: sections of administrative appellate briefs, DOJ case referrals and waiver requests, consent agreements, and pleadings in judicial and administrative proceedings.
- Conducted legal research and wrote memoranda on state and federal enforcement-related issues in Title II of the Clean Air Act.
- Researched and briefed management on state tampering and defeat device prohibitions to identify potential enforcement partners.
- Created a training program and reference compendium for government attorneys on enforcing Clean Air Act § 203(a)(3) in the aftermarket context.
- Implemented a database to track aftermarket tampering and defeat device enforcement actions at EPA HQ, EPA regional offices, and the DOJ.

**Government Service**

**Environmental Protection Agency, Vehicle and Engine Enforcement Branch**

Honors Law Clerk, 2018

**U. S. House of Representatives, Office of Earl Pomeroy**

Legislative Fellow, 2010

**U.S. House of Representatives, Office of Dan Lipinski**

Legislative Intern, 2010

**U. S. House of Representatives, Office of Phil Hare**

Legislative Intern, 2010

**United States Senate, Office of Barbara Boxer**

Legislative Intern, 2009

### Alerts

- EPA Finalizes Major Power Plant Rules, 04/26/2024
- EPA Heavy Truck Standards to Drive Down GHG Emissions, 04/01/2024
- EPA Files Record Climate Enforcement Action Against Corporate HFC Importer, 03/27/2024
- EPA Finalizes Groundbreaking Multipollutant Standards for Passenger Vehicles, 03/20/2024
- EPA Emphasizes its Criminal Enforcement Program, 02/26/2024
- Report Highlights Need for More Robust Corporate Record-Retention Strategy, 12/12/2023
- New EPA Enforcement Priorities Target Climate Change, PFAS Contamination, and Coal Ash Impoundments, 08/24/2023
- Stringent New Vehicle Standards Proposed by EPA, 04/13/2023
- Supreme Court Limits EPA's Authority to Regulate Greenhouse Gas Emissions, 06/30/2022
- DOJ Restores Supplemental Environmental Projects in a Slate of Environmental Justice Initiatives, 05/12/2022