



BRYAN E. KEYT

Partner

Chicago

Partner and Global Practice Group Leader - Energy, Environment and Infrastructure

E: bryan.keyt@bclplaw.com

T: [+1 312 602 5036](tel:+13126025036)

BIOGRAPHY

Bryan is the leader of the firm's Energy, Environment and Infrastructure Practice Group. His practice focuses on a wide range of environmental, energy, health and safety matters. In these capacities, he regularly counsels clients regarding the management of risks and liabilities associated with air, water, waste management, chemical handling and disposal, Superfund, process safety and risk management, and occupational safety and health. He also counsels clients on strategic environmental, health and safety auditing and planning, and regularly defends litigation and administrative enforcement matters brought by U.S. EPA, OSHA, MSHA, and state and local regulatory agencies. His enforcement defense experience includes matters involving major federal environmental statutes, state and local environmental laws, and also cases involving release reporting issues. He has also successfully defended clients in safety and health enforcement

matters following industrial accidents, including matters involving chemical spills and employee fatalities.

Bryan represents traditional, alternative and renewable energy businesses regarding environmental, safety and health, customer contract, supply contract, regulatory, transactional (asset and stock) and general business matters. His experience includes representation of alternative retail electric and gas suppliers, district energy companies, wind and solar companies, biofuel and other independent energy producers. He has helped clients negotiate pipeline/terminaling agreements, customer contracts, material supply and other energy business agreements. He has also represented numerous renewable energy companies regarding development issues involved with construction and permitting of large-scale wind and solar developments including counseling under the National Environmental Policy Act, the Endangered Species Act, the Migratory Bird Treaty Act, and the Bald and Golden Eagle Protection Act.

As part of his extensive transactional background, Bryan regularly represents clients in corporate and real estate transactions including the negotiation of asset purchase and sales agreements, stock purchase agreements, and real estate and remediation agreements associated with "Brownfield" redevelopment projects. He has significant experience representing clients conducting environmental remediation and participating in state voluntary cleanup programs. Representative "Brownfield" experiences include: the acquisition, voluntary remediation and redevelopment of a 265-acre metals manufacturing facility; development of a large scale intermodal facility; and numerous other remediation and redevelopment projects ranging in size from one acre to over 1000 acres.

Bryan has written several law review and journal articles on environmental issues. His articles on recovering attorney's fees under CERCLA and RCRA Criminal Liability have been published in the *DePaul Law Review* and the *Chemical Waste Litigation Reporter*, respectively. He also co-authored the Environmental Chapter of the Illinois Continuing Legal Education's Construction law handbook. Bryan regularly speaks on a range of environmental, energy, health and safety topics. He has made presentations to Fortune 500 and other private companies including Robert Bosch Corporation, Dean Foods Company, Brunswick Corporation, and ACH Food Companies.

AREAS OF FOCUS

- Redevelopment
- Logistics & Industrial

CIVIC INVOLVEMENT & HONORS

- *Best Lawyers of America*, Environmental Law (2023-2024)
- *Chambers USA* (2022-2023)

PROFESSIONAL AFFILIATIONS

- Executive Committee of the National Brownfield Association – Illinois Chapter
- American Bar Association
- Illinois Bar Association

COMMITTEE CONTENT

- Sustainability Committee

ADMISSIONS

- Colorado, 2025
- Illinois, 1993

EDUCATION

DePaul University, J.D., with honors, 1993

Colgate University, B.A., cum laude, 1988

RELATED PRACTICE AREAS

- Energy Transition
- Aviation, Aerospace & Defense
- Health & Safety
- Investigations
- Litigation & Dispute Resolution
- Regulation, Compliance & Advisory
- ESG & Energy Transition
- Employment Class & Collective Actions
- Logistics & Industrial

- Renewables
- Redevelopment
- Power
- Ethylene Oxide Team
- Cross-border Employment Issues
- PFAS Team
- Data Center & Digital Infrastructure Team
- Oil, Gas and LNG
- Brownfields
- Citizen Suits/NIMBY
- Clean Air Act
- Clean Water Law
- Compliance Audits and Internal Investigations
- Cost Recovery Litigation (Superfund/CERCLA and State equivalents)
- Criminal Enforcement
- Endangered Species (ESA)
- Environmental Review (NEPA and State EIS laws)
- Hazardous Materials Transportation (HMTA)
- Hazardous Waste (RCRA)
- Insurance Counseling
- Oil Spills
- Pesticides (FIFRA)
- Reporting Requirements (EPCRA, CERCLA, Prop 65 and other state laws)
- Safe Drinking Water (SDWA)
- Solid Waste and Landfills
- Toxic Substances Regulation (TSCA)
- Transactional Work, Including SEC Disclosures
- Underground Injection Control (UIC)
- Water Rights
- Wetlands
- Mobile Source Emissions and Fleet Management
- Agribusiness
- Food & Beverage
- Pubs, Clubs & Restaurants
- Food & Agribusiness
- Environment
- Employment & Labor
- Real Estate
- Infrastructure

RELATED INSIGHTS

Insights

Mar 17, 2025

EPA Announces New National Enforcement Policies

Blog Post

Mar 12, 2025

Environmental Justice Revisited

Since January 20, 2025, the Trump Administration has implemented numerous changes to federal environmental justice (“EJ”) initiatives which are expected to result in reduced permitting and regulatory burdens. While the current administration may continue to make changes to EJ policies on a federal level, it is important to know that many states still have their own EJ policies that remain enforceable. This insight discusses the following three things: provides the necessary historical context regarding EJ; outlines the recent actions by the Trump Administration; and explores some state regulations and potential ramifications for your business. It is vital for your business to stay current with these developments and to consult with legal counsel before making any changes to your operations based on the current administration's actions.

Blog Post

Feb 04, 2025

PFAS in Soil: State Regulations

In the absence of enforceable federal standards for per- and polyfluoroalkyl substances (“PFAS”) in soil, several states have started the process of regulating PFAS in soil themselves. These regulations have implications for due diligence, site investigations, and remediation decisions. This client alert explores the current landscape of state regulations regarding the advisory, notification, and cleanup levels for PFAS – most commonly perfluorooctane sulfonic acid (“PFOS”) and perfluorooctanoic acid (“PFOA”) – in soil.

Blog Post

Jan 27, 2025

Energy Policies Revisited: Trump’s Executive Orders

Insights

Jan 27, 2025

Energy Policies Revisited: Trump’s Executive Orders

Blog Post

Dec 19, 2024

PFAS in firefighting foam (AFFF) and equipment: state-by-state regulations

Numerous states have either enacted or proposed regulations regarding per- or polyfluoroalkyl substances (“PFAS”) present in Class B Aqueous Film-Forming Foams (“AFFF”) used for firefighting, or present in firefighters’ clothing and equipment. These regulations typically involve restrictions in four general areas: Discharge or Use Restrictions. These regulations usually limit or prohibit the use of AFFF in training or testing exercises, and may only allow the use of AFFF in active firefighting situations; Disposal, Storage, Inventory or “Take-back” Provisions. Some states have enacted state run programs to purchase and dispose of AFFF, usually purchasing supplies from government agencies; Notification or Reporting Requirements. When continued use of AFFF is allowed, some states have required that businesses report specific details regarding their discharge; and Limitations on Personal Protective Equip...

Blog Post

Nov 27, 2024

PFAS in groundwater: state-by-state regulations

In the absence of federal cleanup standards for per- and polyfluoroalkyl substances (“PFAS”) in groundwater, several states have started the process of regulating PFAS in groundwater themselves. As a result, states have adopted a patchwork of regulations and guidance standards that present significant compliance challenges to impacted industries. This client alert explores the current landscape of state regulations regarding the advisory, notification, and cleanup levels for PFAS – typically perfluorooctane sulfonic acid (“PFOS”) and perfluorooctanoic acid (“PFOA”) – in groundwater.

Blog Post

Nov 06, 2024

PFAS in children’s products: state-by-state regulations

PFAS in Children’s Products is a major focus for state regulators across the country, prompting some of the most stringent PFAS restrictions in consumer products. Thus far, eleven (11) states have enacted regulations concerning PFAS substances in Children’s or Juvenile Products (“Children’s Products”). Six (6) additional states have proposed Children’s Products regulations, and many of these are expected to continue to move through the legislative process in future months. There are a number of key features that are generally consistent across the state laws: “Juvenile products” are generally defined as products that are intended for use by children 12 years old or younger. The prohibitions apply to “intentionally added” PFAS, which generally are PFAS added to a product to create a specific effect in the finished product. The compliance timelines are much shorter than the timelines for other types of consumer pr...

Blog Post

Sep 13, 2024

PFAS drinking water standards: state-by-state regulations

The regulation of per- and polyfluoroalkyl substances (“PFAS”) in drinking water remains one of the primary focuses for legislatures and agencies at both the state and federal levels. In April 2024, the United States Environmental Protection Agency (“EPA”) issued Maximum Contaminant Levels (“MCLs”) and Maximum Concentration Level Goals (“MCLGs”) for certain PFAS, establishing limits as low as 4 parts per trillion (“ppt”). Many states have already regulated PFAS compounds in drinking water but have done so in a variety of different ways, and at different levels. The result is a patchwork of regulations and standards which presents significant operational and compliance challenges to impacted drinking water systems. This client alert surveys the the MCLs, as well as guidance and notification levels, for PFAS compounds in drinking water across the United States.