



## Jon M. Metrione

Senior Investigator

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- Expertise**
- Witness identification and interviewing
  - Field investigation
  - Environmental liability investigation

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**Summary**

Mr. Metrione is director of business intelligence and investigations with The Intelligence Group. As an investigator with about 20 years of professional experience, Mr. Metrione regularly manages integrated investigations for clients utilizing intelligence gathering, investigation, and forensics skill sets. He is responsible for overseeing the firm's investigative efforts involving the interview of witnesses, physical and electronic surveillance, intelligence gathering, and computer forensics.

Mr. Metrione has extensive experience with environmental matters, including environmental liability investigations for cost recovery and remedial cost allocation purposes. He has managed numerous large, complex field investigation efforts in support of these matters, including the interview of large witness pools, inventory of historic and present-day land use, and collection of historical documents and records. He has extensive experience in developing historical information from sources—federal, state and local enforcement agencies; document repositories; and witnesses—for numerous National Priorities List (NPL) and state lead sites associated with hazardous substances including dioxins, polychlorinated biphenyls (PCBs), mercury and other metals, polycyclic aromatic hydrocarbons (PAHs), and pesticides. Mr. Metrione has also demonstrated experience in evaluating the financial viability of litigants and tracking corporate successors.

During his investigative career, Mr. Metrione has conducted hundreds of interviews with a variety of people, including former employees, managers, customers, and government officials. He is highly skilled in the managing large interview efforts conducted in civil litigation settings and regularly coordinating the use of interview scripts and language to comply with the jurisdictional requirements of various courts. He is adept at integrating case evidence with the interview process and compiling interview and evidentiary documentation in preparation for expert reports, the execution of affidavits and witness statements, and witness deposition.

Mr. Metrione holds a Bachelor of Arts degree in Criminal Justice from the University of Delaware and is certified in the Reid Technique of Interviewing and Interrogation.

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**Professional Experience**

**Technical Consultation and Litigation Support (2002–Ongoing)**  
Confidential Client, New Jersey

TIG Environmental provides technical and litigation support for environmental liability assessment related to sediment remediation at a complex urban river Superfund site in northern New Jersey. Investigative services performed include acquisition of historical records, conducting witness testimonies, reviewing environmental data, and developing expert technical reports for the identification and assessment of potentially responsible parties (PRPs) who contributed to the contamination of the Superfund site. Contaminant source identification involves evaluation of the historical operations of hundreds of PRPs at upland sites, fate and transport analysis, and investigation and mapping of historical direct and indirect sewer discharges. TIG Environmental manages a database and client

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accessible data visualization platform encompassing all historical sampling data collected at the Superfund site.

Mr. Metrione was project manager for a complex, multi-party environmental-litigation matter associated with a contaminated sediment site in the northeastern United States. He directed multiple staff in the identification, location, and interview process of potential witnesses; managed a witness pool consisting of several hundred witnesses; performed in-field and telephone interviews of cooperating witnesses nationwide; and established regular interface with the client and its legal counsel.

**Technical Consultation and Litigation Support (2002–Ongoing)**

Confidential Client, New Jersey

TIG Environmental provides technical and litigation support for environmental liability assessment related to sediment remediation in the Newark Bay Study Area (NBSA) - a large Superfund bay estuary complex, part of the larger New York/New Jersey Harbor Estuary. The area hydraulically connects to the Passaic River Superfund Site and includes portions of the Hackensack River, Arthur Kill, and Kill van Kull. TIG Environmental performs investigative services including the acquisition and evaluation of historical records, conducting witness testimony, assessing environmental data, and preparing technical reports for identification and assessment of potentially responsible parties (PRPs) associated with the site. TIG Environmental develops deliverables providing detailed information regarding direct and/or indirect discharges to the NBSA from industrial, manufacturing, commercial, public works, and other potential sources. TIG Environmental personnel provided technical support on the remedial investigation and feasibility studies (RI/FS) activities on the NBSA. Such support included identifying and characterizing stormwater and combined sewer overflows that have affected sediments in the NBSA. TIG Environmental also acquired, compiled and evaluated information on publicly owned treatment works (POTWs), including their upstream collection system networks and their role as potential contaminant sources.

Mr. Metrione is serving as senior investigator to identify significant industrial users potentially responsible for the pollution of this estuary. Information compiled from public sources is being used to identify and prioritize current and historical users based on potential contribution.

**Technical Consultant for Environmental Liability Assessment (2019–Ongoing)**

Confidential Client, California

TIG Environmental is providing its client technical expert support for environmental liability assessment at the San Fernando Valley Superfund Site. TIG Environmental is investigating PRPs relevant to contaminant discharges to groundwater at the site. In addition, TIG Environmental is assessing and prioritizing all PRPs at the site. To support these efforts, TIG Environmental is identifying and reviewing relevant historical, technical, remediation, regulatory, and prior PRP investigation documentation and investigating operations in the area of the site associated with the client. TIG Environmental is producing documentation summarizing its findings and identifying high-priority PRPs and sites associated with priority contaminants that may warrant elevating those PRP cases to regulatory agencies. Findings from this investigation and review are anticipated to support future cost allocation for remediation at the site.



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Mr. Metrione manages multiple staff in concurrent with in-field public records research and investigative efforts. He manages staff performing in-field research and database research in order to develop the history of the site, identify potentially responsible parties that contributed to the regional groundwater contamination, and identify and interview potential witnesses.

**Liability Investigation (2004–2005)**

Confidential Client, New Jersey

Mr. Metrione managed a PRP investigation of an uncontrolled landfill for a confidential client. He directed multiple staff in concurrent in-field public records research and investigative efforts. He performed in-field research and database research in order to develop the history of the site, identify the known and potential parties that disposed of hazardous waste at the site, and identify potential witnesses. He performed an on-the-ground survey of the neighboring area to identify and map out drainage to and from the site, gathered intelligence and developed an extensive history of the site and its possible historical use by commercial and industrial entities, and personally performed in-field archival searches and confidential witness interviews to assist the client's defense against claims.

**Cost Recovery Litigation (2005–2009)**

Confidential Client, New Jersey

Mr. Metrione was lead investigator in support of cost recovery litigation at a large NPL sediment site with multiple PRPs. He managed a pool of potential *de bene esse* witnesses, coordinated contacts and interview work with investigative staff, and oversaw the process of memorializing testimony via statements and affidavits. He assisted the coordination of investigative research team members assigned to review and code incoming defendant document productions in the Relativity platform.

**PRP Identification and Allocation Support (2004–2008)**

Confidential Client, New Jersey

Mr. Metrione was lead investigator for the preparation of source identification deliverables required by U.S. Environmental Protection Agency (EPA) as part of a remedial investigation and feasibility study of an urban waterway NPL sediment site. He coordinated and conducted efforts to compile a historical corridor inventory of potential industrial sources operating over a more than 100-year timeframe. Efforts involved researching historical records and documents, compiling historical operating details, and preparing graphics and deliverables.

**PRP Identification and Allocation Support (2015–Ongoing)**

Confidential Client, Ontario, Canada

TIG Environmental provides investigative and technical support for identification of PRPs associated with specific contaminants in a river system. TIG Environmental's initial investigation identified approximately 300 PRPs, including current and historical industrial operators, power plants, and publicly owned treatment works. Subsequently, TIG Environmental prioritized specific PRPs for additional investigation that included retrieval and evaluation of public records, regulatory documents, civil litigation records, and relevant online media. Ongoing efforts include continued technical support to identify and investigate PRPs that may contribute to cleanup costs in the area of interest.

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Mr. Metrione served as lead investigator for a mercury-contaminated sediment site subject to Canadian enforcement action. He coordinated and conducted efforts to compile a historical corridor inventory of potential industrial sources operating over a more than 100-year timeframe. Efforts involved the researching of historical records and documents, compiling historical operating details, and preparing graphics and deliverables. He prioritized specific potential mercury sources for further investigation and compiled evidence of mercury use and discharge to waterway.

**Toxic Tort Investigation (2002–Ongoing)**

Confidential Clients, Multinational

Mr. Metrione was lead investigator and has managed numerous investigations conducted in support of toxic tort litigation and claims related to alleged exposures to asbestos-containing materials, silica, and mold. He conducted and managed investigations related to historical product identification and alternate routes of exposure, investigated backgrounds of plaintiffs, compiled work histories, developed evidence of product use, prepared statements, and obtained witness affidavits.

**PRP Identification (2018–Ongoing)**

Confidential Client, Texas

TIG Environmental is performing a PRP investigation for a confidential client in Texas relative to mass tort litigation brought by a large group of plaintiffs. The investigation centers on identifying historical and present day PRPs responsible for upland contamination at the sites for potential contribution to sediment contamination at an adjacent waterbody as well as potential contribution of hazardous waste into unregulated disposal sites in that area that may have served as potential sources of exposure to claimants. TIG Environmental's investigation identified over 400 PRPs that have potentially contributed hazardous waste to the waterbody and are potential defendants in the litigation.

Mr. Metrione manages multiple staff performing in-field public records research and investigative efforts. He is managing staff performing in-field research and database research in order to develop the history of the disposal site and to identify potentially responsible parties that contributed to the sediment contamination of the adjacent waterbody.

**Technical Consultation and Allocation/Litigation Support (2016–2019)**

Confidential Client, New Jersey

TIG Environmental provides technical support for environmental liability assessment and cost allocation on an accelerated schedule for an upland Superfund site involving soil and groundwater. Development of a proposed cost allocation strategy, on behalf of the client, included evaluating environmental data and technical reports, witness testimony, and historical records. The effort included research and forensic analysis of potential historical contaminant sources, other PRPs' contaminant contributions, industrial archeology/chemical processes, and contaminant fate and transport. TIG Environmental used allocation modeling, calculations, and statistical analyses based on the data generated from this research to assist the client in decision-making on numerous allocation scenarios among the approximately 60 PRPs. TIG Environmental authored position papers to support the client in both offensive and defensive positions.

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Mr. Metrione reviewed, analyzed, and summarized historical documents provided by the client to determine potential historical contaminant sources and PRP contaminant contributions, providing support to the allocation team.

**Technical Support of Cost Allocation (2013–Ongoing)**

Confidential Client, New Jersey

TIG Environmental provides technical support on investigative identification of PRPs in a tidal tributary system with contaminated sediments for remedial cost allocation purposes. The evaluation includes research and forensic analysis to determine the nexus from investigated upland PRP sites to the tributary system for specific contaminants. The results of this investigation were used to develop a comprehensive allocation strategy and supporting expert reports for sediment and marsh cleanup cost allocation.

Mr. Metrione serves as managing investigator regarding a complex Superfund tributary and estuary site in northern New Jersey. He is involved in the investigation and identification of PRPs to determine liability for overall site remediation costs.

**PFAS Liability Investigation (2014)**

Confidential Client, New Jersey

On behalf of the owner of a chemical manufacturing facility that was the focus of a state-led action to clean up per- and polyfluoroalkyl substance (PFAS) contamination in regional groundwater and surface water, TIG Environmental identified other current and historical site owners and operators near the facility that were potentially associated with the contamination. TIG Environmental used investigative teams to survey the industrialized target study area and inventory all high-value PRPs that were likely associated with PFAS contamination. Investigative and technical staff gathered historical documents, analyzed aerial imagery and historical mapping, and obtained regulatory documentation to build case files on the target PRPs.

Mr. Metrione served as lead investigator on this project collecting and analyzing historical and environmental documents and managing the compilation of an inventory of other potential contributors to groundwater contamination.

**Insurance Claim Verification (2010)**

Confidential Client, Multinational

Mr. Metrione served as lead investigator for vetting plaintiff claims made in large mass tort matter concerning damages due to environmental contamination. He coordinated and conducted research regarding plaintiff histories and claims in an effort to identify which claims were fraudulent.



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**Academic Qualifications**      BA in Criminal Justice, University of Delaware, 2001

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**Professional Training**

- Reid Technique of Interviewing and Interrogation, February 2003
- Advanced Internet Searching for Investigators, June 2009