



STATEMENT OF QUALIFICATIONS

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ENVIRONMENTAL SERVICES
PERMITTING, REGULATORY, AND TESTING SERVICES
STATEMENT OF QUALIFICATIONS

1. OVERVIEW

A successful reputation results from a commitment to provide responsive service and excellent products. Enthusiastic and innovative, the staff of **Air/Compliance Consultants, Inc. (ACCI)** is known both for its dedication to excellence and for its responsiveness to the needs of our clients. **ACCI** is distinguished because we provide testing, permitting and regulatory support as an integrated service. Our expertise covers a complete range of compliance, testing and environmental management services.

We measure our success by the large percentage of repeat business that we achieve. Over 80% of **ACCI's** projects are from repeat clients! Our staff has been managing a wide array of environmental compliance programs for many of our clients for over 17 years.

ACCI is a small, woman-owned business (SBE/WBE) founded in 1997 by the staff of Geraghty & Miller's national hub for Air Quality Services in Pittsburgh. As entrepreneurs, we know that it takes a commitment to hard work and disciplined management to be the recognized leaders. We offer that kind of commitment to our clients every day.

The following is a summary of services we provide to our clients:

Source Testing Services

- Complete USEPA Reference Method Capabilities
- FTIR
- Field GC
- In house PM/Condensable PM Analysis
- Selective Condensation (SO₃)
- NCASI, SCAQMD, ASTM & SW-846 Methods
- ASME Power Test Code Testing
- Leak Detection and Repair (LDAR)
- Sampling at High Temperature &/or Pressure
- 3-D Flow (EPA Method 2F)
- On Site Analysis
- Suit Case Monitoring
- Water/Solid Waste Sampling

CEM & COMS Services

- Certification Testing
- Quarterly Emissions Reporting (Parts 60 & 75)
- Part 75 and State Monitoring Plans
- Parametric Emissions Monitoring
- CEM Specification
- CEM & COM RATAs & Quarterly Audits
- PADEP Monitoring Plans and Phase I Applications
- QA Plans (Part 60 and Part 75)
- NO_x Budget Trading Program Assistance

Ambient Air Monitoring

- Ambient Air Sampling (PM₁₀, TSP, metals, Pb, asbestos, PCBs, dioxin, pesticides, PAH, VOC)
- Construction and Remediation Site Monitoring
- Meteorological Monitoring
- Odor Sampling

Emissions Control Equipment

- Equipment Design and Specification
- Cost/Efficiency Analysis
- Troubleshooting

Industrial Hygiene/Indoor Air Quality Services

- Industrial Hygiene Monitoring
- Investigation of “sick building” and Building-Related Illness Complaints
- Chemical, Noise and Radiological Surveys.
- Source Characterization

Regulatory Compliance

- Emissions and Carbon Inventories
- Regulatory Impact and Compliance Analysis
- MACT Compliance Assistance
- Compliance Manuals
- Recordkeeping and Reporting
- Startup, Shutdown, and Malfunction Plans
- SARA Form R and Tier I/Tier II Reporting

Regulatory Compliance cont'd

- Emergency Response and Contingency Plans
- Expert Testimony
- Risk Management Plans (RMPs)
- Facility Security Plans
- SPPC Plans

Permitting and Modeling

- Emission Inventory Development
- BACT/MACT/RACT and LAER Analyses
- PSD/NSR Permitting
- Title V Permitting
- New Source Permitting
- Air Quality Impact Assessments & Dispersion Modeling

Auditing

- Compliance Auditing
- ASTM Phase I Site Assessments

2. ENGINEERING ANALYSIS

ACCI's engineering background has proved valuable in establishing our reputation for providing innovative, high-quality environmental services. ACCI applies an engineered approach to assist clients in field testing, plant performance evaluations, research, design studies, air pollution control, and emission monitoring.

2.1. Emissions Control

The staff of ACCI has assisted many clients in control technology assessments under Reasonably Available Control Technology (RACT), Best Available Control Technology (BACT), Maximum Available Control Technology (MACT) and Lowest Achievable Emission Rate (LAER) proposals. The staff of ACCI has conducted over 75 control technology analyses. Our experience covers air pollution control systems for a wide variety of industries including:

- Paints, Adhesives and Coatings
- Resin Production
- Coke Making
- Boilers
- Petroleum Refining and Marketing
- Municipal Waste Combustion
- Chemical Manufacturing
- Groundwater Remediation
- Wood Treating
- Metal Treatment/Plating
- Printing
- Iron and Steel Industry

2.2. Emissions Monitoring

Our staff has designed and specified continuous monitoring and air sampling systems for a variety of industries including power plants, refineries, steel plants, coke plants, chemical plants and incinerators. Our experience includes sampling systems for flow rate, oxides of nitrogen (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), hazardous air pollutants (HAPs), particulate, opacity and acid gases (ammonia [NH_3], hydrogen chloride [HCl] and sulfur dioxide [SO_2]). Much of our hands-on experience comes through the operating and maintaining of our own continuous emission monitoring (CEM) trailers and the servicing and troubleshooting of our clients systems. Our staff has also designed many specialized sampling systems to meet industrial hygiene applications, monitor room and stack radioactivity levels and determine time/temperature compliance for incinerators. We are also assisting a number of clients with methods to meet the compliance assurance monitoring (CAM) requirements under Title V.



2.3. Plant Performance Tests

Process evaluations are critical to process optimization and equipment design. Energy efficiency can be assessed to determine whether potential improvements can reduce fuel usage. Material losses can be assessed to pinpoint whether the recovery of valuable materials can increase yield and reduce costs. Trace constituents can be measured to determine the potential for corrosion, contamination or unsafe worker exposure. ACCI can help clients to conduct research, track down losses, perform cost/benefit analysis, and determine the source of a problem.

3. AIR QUALITY MANAGEMENT

Our staff has been involved in all aspects of air quality management. Our expertise ranges from the preparation of air emission inventories and permit applications to the design and installation



of air pollution control and monitoring equipment. We have frequently negotiated with federal and state agencies for our clients to gain reasonable permit conditions, consent agreements, and compliance plans. Key areas of our air quality expertise are discussed below.

3.1. Permitting & Dispersion Modeling

ACCI personnel have proven experience in preparing and submitting air permit applications for hundreds of clients nationwide. This experience includes permitting major sources in attainment and non-attainment areas under New Source Review (NSR) permitting, Prevention of Significant Deterioration (PSD) permitting and Title V operating permitting programs.

Our expertise includes ambient impact analysis, pre-construction monitoring, and control technology analysis. Our knowledge and experience with New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAPS), MACT and RACT provides a strong background for successful application of the appropriate emission control technologies in the permitting process.

We have assisted a broad range of industrial clients including, but not limited to, pulp and paper, iron and steel, textiles, furniture, glass, chemical, resource recovery, petroleum refining, natural gas transmission, tar processing, coke manufacturing, printing, lime, cement, asphalt, fibers, pipeline, hazardous waste treatment, and incineration facilities.

Dispersion modeling is often used to support permitting. It is also used to support ambient air toxic impact evaluations, RMPs and risk assessments. ACCI's air quality specialists have extensive knowledge and experience when it comes to dispersion modeling techniques. Our modeling experience includes the application of dispersion modeling to RMP development, PSD permitting, minor source permitting, and ambient air impact analysis for Superfund sites.

4. REGULATORY COMPLIANCE MANAGEMENT

ACCI has broad-based experience with regulatory compliance under the Clean Air Act (CAA), Emergency Planning and Community Right-to-Know Act (EPCRA), water and waste programs. Our experience includes responding to enforcement actions, permit negotiations, applicability determinations, regulatory option analyses, compliance manuals, monitoring



plans and the preparation of notices and reports for a number of facilities. ACCI experience encompasses a complete range of state, NSR, PSD, Resource Conservation and Recovery Act (RCRA), NSPS, and NESHAP regulations. We have also helped a number of clients to legally avoid regulatory applicability by establishing permit limitations, installing controls or switching raw materials.

Our staff has completed hundreds of Superfund Amendment Reauthorization Act (SARA) Form R, Title III, and Tier II submittals for clients since the program's inception. ACCI also has expertise in the 112(r) Risk Management Plan (RMP) program, having conducted numerous applicability determinations, off-site consequence analyses, hazard assessments and plan submittals for our clients.

Our waste management experience includes reporting, waste analysis, waste minimization, and development of waste treatment alternatives. Our approach is to first look at reducing waste at the source, followed by looking at alternatives and recycling opportunities.

The following are samples of projects completed by the staff of **ACCI**:

- Developed an air toxic release inventory and emissions control plan to meet BACT requirements at a large multi-source chemical plant.
- Developed a RCRA Subpart CC compliance manual and performed initial audit for a RCRA Hazardous carbon recycling facility.
- Developed waste handling improvement recommendations for a coating facility to lower their generator status to a small quantity generator.
- Developed corporate internet content for Hazardous Communications (HAZCOM) and RCRA programs.
- Prepared and revised emergency response and storm water management plans.

4.1. Training

ACCI has conducted training programs covering a wide variety of environmental topics and regulatory programs. Each presentation is specifically tailored to our client's unique interests and needs. We can provide a complete program or supplement an internal training program.

4.2. Expert Witness Services

ACCI staff members have provided expert witness services to support a number of cases involving regulatory applicability, fugitive dust emissions, CEM equipment design, air pathway exposure risk, opacity violations, emission control equipment design, USEPA test methodologies and regulatory compliance obligations under the CAA and state regulations.

5. TESTING SERVICES

ACCI engineers have demonstrated expertise in the performance and management of a variety of complex projects including diagnostic, compliance, trial burn, CEM and parametric emissions monitoring (PEM) projects. **ACCI** has performed testing in accordance with USEPA, American Society for Testing and Materials (ASTM), National Institute for Occupational Safety and Health (NIOSH) and American Society of Mechanical Engineers (ASME) methods. **ACCI** engineers have

also developed many novel approaches and innovative sampling methods to meet the challenge of interfering compounds, difficult matrices, high temperatures, high pressures and atypical compounds. In many cases, **ACCI** will include data quality assurance programs to assure the accuracy and repeatability of test methods.

With several of our staff having more than 15 years of experience, our personnel are expert in the management and measurement emissions. Eight of our staff members have passed the Source Evaluation Society's Qualification Exam. These exams were developed in satisfying the requirements of ASTM-D7036, "Standard Practice for Competence for Air Emissions Testing Bodies."

5.1. CEMS and PEMS

ACCI utilizes state-of-the-art mobile test laboratories to conduct certification and demonstration programs. Each laboratory is capable of conducting a full spectrum of performance specification testing and compliance testing for CO, carbon dioxide (CO₂), oxygen (O₂), SO₂, NO_x and total hydrocarbon (THC) measurements.

ACCI CEM certification experience spans the Acid Rain program, multiple NSPS Programs and the Boiler and Industrial Furnace (BIF) program. **ACCI** uses a redundant data logger and PC data handling system to generate reliable on-site results.

PEMS are gaining industry and agency acceptance as accurate methods to demonstrate compliance with regulatory limitations in a wide variety of applications. They offer the benefit of often being a lower cost alternative to traditional CEM or testing methodologies. **ACCI** has assisted clients in the development of PEMS with significant cost-savings over the alternative methods.

5.2. Ambient Air

ACCI has designed and managed over 60 ambient air assessments to address pre-construction requirements, air toxic impacts, odor complaints, remediation activity impacts, and air pathway risk assessments. Ambient air assessment programs have been conducted for a wide range of volatile, semi-volatile, particulate, gaseous, and metal constituents. **ACCI** also designed real-

time fence-line monitoring networks to safeguard downwind populations from potential hazardous chemical exposure.

5.3. Odor Monitoring

ACCI has also conducted odor investigations for industrial and waste handling facilities. **ACCI's** odor assessment experience includes use of the ASTM odor panel method and the development of site-specific approaches to collecting odor data. **ACCI** has also developed several unique analytical approaches to determining the cause and origin of odor for facilities.

5.4. Equipment Inventory

ACCI has a complete inventory of ambient, source and indoor air quality equipment. We also stock a large range of calibration gases and sampling media to quickly respond to our client's requests.

5.5. Indoor Air Quality and Industrial

ACCI has assisted many clients to resolve indoor air quality problems in office buildings, warehouses, and commercial and retail facilities. **ACCI** uses a phased approach to solve indoor air-quality problems at the lowest possible cost to our customers. The initial phase of an investigation usually involves inspection, interviews and information gathering. Then, based on initial findings, measurements of temperature, relative humidity, hydrocarbons, CO, CO₂, bioaerosols, fungus, molds, or other suspected contaminants are performed. The results are compiled in a report and compared to regulatory and/or recommended standards for the parameter on compounds of concern.

ACCI has assisted a number of clients to conduct industrial hygiene assessments in a wide variety of chemical and industrial settings. Sampling programs are developed in accordance with the National Institute for Occupational Safety and Health (NIOSH) and Occupational Safety and Health Administration (OSHA) based methods for noise and chemical exposures. **ACCI** has also conducted ventilation surveys for clients to demonstrate that minimum fuel velocity standards are being met and to show that monitoring instruments are properly located.

6. SOLID WASTE PERMITTING & REGULATORY COMPLIANCE

The staff of **ACCI** has experience in the preparation of permit applications for hazardous, residual and solid waste streams for a variety of industrial and waste handling facilities. Our staff has also prepared successful applications to state officials to allow for the beneficial use of industrial byproducts to eliminate disposition in a landfill. **ACCI** staff members have also conducted regulatory applicability analyses related to waste streams. Typical projects have included waste analysis to categorize various byproduct and waste streams as hazardous, residual or solid waste through a variety of techniques including process knowledge and sampling. **ACCI** staff members have also prepared the annual and biannual residual and hazardous waste reports for several industrial clients.

6.1. Water and Solid Waste Sampling

ACCI has conducted routine sampling as well as one-time water and soil investigations to support regulatory requirements, accident investigation and property transfers. Our staff is experienced in the collection and handling of samples for soil, solid waste and groundwater, and has prepared and performed sampling to meet permitting requirements, site investigations, and determine material properties. Representative projects have included the following:

- Well Sampling and Water Level Measurements for a Site Remediation
- Storm Water Sampling and Analysis for an Operating Facility
- Conductivity, Oxidation Reduction Potential, Chloride, and pH Analysis for a Wastewater Treatment Facility
- Soil Sampling and Analysis as Part of a Phase II Site Investigation
- Conducting Waste Characterization for Disposal
- Conducted Solid “Waste” Analysis for a Beneficial Use Determination
- Developing an Ash Sampling Program for a Wood-Fired Boiler
- Writing Methods and Applying Sampling Procedures to Determine Coal Properties for Regulatory Compliance

ACCI staff members have developed the sampling procedures, conducted sampling programs and prepared reports for a wide variety of materials including ash residue, municipal solid waste, wastewater sludge, and coal and wood waste.

7. COMPLIANCE AND PROPERTY TRANSFER AUDITS

Non-compliance is becoming increasingly risky as individual and corporate criminal and civil penalties become more severe. Maintaining compliance is more important than ever as new regulations take more time and resources to address. ACCI believes that environmental compliance audits, carefully conceived and meticulously implemented, can play a critical role in meeting the goals of long-term compliance.

7.1. Multi-Media Compliance Audits

ACCI's experience with environmental regulatory compliance includes regulatory compliance audits, assistance in developing operations, management strategies, and general project support. Our staff has conducted more than 100 audits in 25 states. In addition to a broad geographic range, our experience also includes a wide range of industries.

7.2. Environmental Management Systems Evaluation

ACCI has completed over 30 Environmental Management Systems (EMS) audits at numerous facilities across the United States. Our experienced staff can provide your company with a detailed evaluation and recommendations to improve your company's EMS.

7.3. Environmental Site Assessments

ACCI staff members have performed environmental due-diligence assessments for sites that have ranged from undeveloped properties to complex industrial facilities. The Environmental Site Assessments (ESAs) have been performed in accordance with the practices and policies established in ASTM Standards or in accordance with the customized approaches established by our clients. Often, Phase I site assessments are combined with regulatory compliance audits so that risks are fully realized.

Reports are compiled to meet client needs and have ranged from short letter reports to extensive assessment summaries.

8. STAFF

The staff of **ACCI** is a team of professionals dedicated to the highest level of technical and ethical standards. We offer expertise in a wide array of environmental fields and constantly train and develop our staff to keep on top of changes in the regulatory environment.

9. SUMMARY

Air/Compliance Consultants, Inc. (ACCI) is committed to providing quality products, responsive service and creative solutions to environmental projects. As an employee-owned company, we are dedicated to our clients and achieving their satisfaction. Our dedication is evidenced by the high portion of repeat business that we receive from our clients. We look forward to forming a long-term relationship with your company.