December 1, 2023

Lauren Fike, Compliance Specialist
Waste Management
Waste Management Program
400 Waterfront Drive
Pittsburgh, Pennsylvania 15222

Subject: Westmoreland Sanitary Landfill, LLC – Sanitary Landfill
Consent Order and Agreement Executed November 1, 2023
Notice of Contract with EA, EMS Consultant and EMS Auditor
Rostraver Township, Westmoreland County, Pennsylvania.

Westmoreland Sanitary Landfill, LLC is providing this Notice to the Department of the consultants selected to satisfy the roles of Environmental Auditor, EMS Consultant and EMS Auditor in accordance with Corrective Action Paragraphs 8a, 9a and 10a of the Consent Order and Agreement executed on November 1, 2023.

- Environmental Auditor – Civil and Environmental Consultants, Inc. (CEC) was selected to perform the environmental compliance services in accordance with the Consent Order. The accepted proposal from CEC is included here for a description of the services being performed.

- EMS Consultant – CEC was also selected to develop the Environmental Management System in accordance with the Consent Order. The accepted proposal from CEC is included here for a description of the services being performed.

- EMS Auditor – SCS Engineers (SCS) were selected to perform the EMS Audit in accordance with the Consent Order. The accepted proposal from SCS is included here for a description of the services being performed. Please note, SCS provide a proposal for EA, EMS Consultant and EMS Auditor services. However, they were selected to only perform the role of EMS Auditor as noted under the sections above.

Should you have any questions or need any additional information, please do not hesitate to contact Michael Zucatti of Noble Environmental at (717) 448-5613 or Brian Stewart of Noble Environmental at (412) 576-2236.

Sincerely,

Michael E. Zucatti, P.E.
Director of Engineering

Brian E. Stewart, P.E.
VP of Engineering

WESTMORELAND SANITARY LANDFILL
CONSENT ORDER AND AGREEMENT
(EXECUTED NOVEMBER 1, 2023)

EA AND EMS CONSULTANT PROPOSAL

November 17, 2023

Mr. Brian Stewart, P.E.
Vice President of Engineering
Noble Environmental
111 Conner Lane
Belle Vernon, Pennsylvania 15012

Dear Brian:

Subject: Revised Proposal
Environmental Audit and EMS Development
Westmoreland Sanitary Landfill, LLC
Westmoreland Sanitary Landfill
CEC Project 334-863

Civil & Environmental Consultants, Inc. (CEC) is pleased to present this revised proposal to assist Westmoreland Sanitary Landfill, LLC with environmental compliance services for the Westmoreland Sanitary Landfill (WSL). The scope of services presented in this proposal is based on our November 9, 2023 meeting, the Pennsylvania Department of Environmental Protection (DEP) November 1, 2023 Consent Order and Agreement (COA), and our experience with similar projects.

1.0 BACKGROUND

CEC understands that WSL recently executed a COA with the DEP. As described in the COA, the DEP has required that WSL engage a third-party to perform an Environmental Audit (EA). WSL must also retain a third-party to develop an Environmental Management System (EMS) and EMS Manual. As such, the purpose of this proposal is to perform an EA and develop an EMS for WSL, as outlined in the COA.

2.0 SCOPE OF SERVICES

Task 1 – Environmental Audit and Interim Report

CEC will perform a review of WSL's environmental permits, monitoring and inspection records, reporting records, and other compliance related items. Throughout the document review, CEC will communicate with WSL on a routine basis to report identified deficiencies in order to facilitate their resolution on an expedited basis. For the purposes of estimating the level of effort for this task, the scope of the regulatory programs to be reviewed is anticipated to include the following:

- Municipal Solid Waste (MSW) Permits;
- National Pollutant Discharge Elimination System (NPDES) Permits;
- Air Permits;

- Monitoring and Reporting Records (e.g., leachate, landfill gas, groundwater, air);
- WSL Inspection Records;
- Regulatory Inspection Records;
- Notices of Violation, Consent Orders/Decrees, Administrative Orders;
- February 2021 Corrective Action Plan;
- October 2022 Corrective Action Plan;
- Spill Prevention, Control, and Countermeasure (SPCC) Plan;
- Preparedness, Prevention, and Contingency (PPC) Plan; and
- Stormwater Pollution Prevention Plan (SWPPP).

CEC will provide WSL with access to a shared data site for upload of the documents listed above. However, we have also budgeted for one (1) site visit throughout the document review process to obtain documents that WSL may not have the ability to scan/upload to the data site. The COA also requires an evaluation of to what extent WSL's permitted stormwater management features have been installed, as well as an evaluation of the effectiveness of the leachate containment/handling area. We assume these evaluations will be conducted in a second site visit. Costs associated with the site visits are included in Task 3.

CEC will enlist the appropriate subject matter experts to assess the documents and perform the site visits. After completion of the document review, CEC will prepare an Interim EA Report describing the scope of services performed and our findings, including details of identified deficiencies and recommendations for attaining compliance.

Task 2 – Environmental Audit Follow-Up Evaluation and Final Report

CEC will work with WSL to correct deficiencies identified under Task 1. CEC assumes this may include an additional onsite file review as well as coordination with other consultants who may retain records related to WSL permitting and compliance. Costs associated with the onsite file review are included in Task 3.

CEC notes this task does not include revision of existing documents (e.g., PPC Plan, SPCC Plan, SWPPP, etc.) or facility operational policies/procedures. This task also does not include services such as a DEP file review. If necessary, CEC can provide a scope and cost estimate for these services.

Following WSL's resolution of the identified deficiencies, CEC will prepare a Final EA Report of WSL's environmental compliance status. CEC will provide one (1) draft pdf copy of the Final EA Report to WSL for review. Following receipt of your comments, we will prepare a final pdf copy of the report for submittal to WSL and the DEP. We will also provide one (1) hard copy of the report to WSL.

As discussed, we understand that WSL has had difficulties locating pertinent records in the past and would like to maintain hard copies of certain files onsite. As such, this task also includes an estimated budget for producing copies of documents that WSL wishes to file onsite. Since it is difficult to estimate the volume of copies that may be required, we have included a budgetary number only. If it is determined that the costs associated with preparing hard copy files are greater than estimated, we will provide WSL with a Change Order Request.

Task 3 – Environmental Audit Meetings and Project Management

As described in Tasks 1 and 2, we assume one (1) site visit will be performed during the EA process, a second site visit will be performed to evaluate existing stormwater and leachate management features, and a third site visit will be performed as part of deficiency resolutions. We also assume CEC's Project Manager will meet onsite with WSL to review and discuss the findings of the EA process. This task also includes overall project management and routine communications with WSL.

Task 4 – Environmental Management System Development

CEC will conduct interviews with WSL's environmental manager, senior management, and facility personnel with environmental responsibilities. This task will also include a limited review of existing environmental permits, plans, and programs. CEC will compare observations from the review to current local, state, and federal requirements in order to generate a list of compliance obligations. CEC will advise WSL as to any deficiencies or opportunities for improvement identified during this task.

CEC will generate an EMS gap assessment that will identify which EMS elements exist and which elements need to be created, as well as whether or not existing elements should be modified at this time. CEC will then create and/or modify the EMS elements assigned to CEC and develop the overall EMS, which we assume will incorporate the following components:

- **Leadership and Commitment** – demonstrate accountability, ensure the EMS is integrated and effective, promote compliance and continual improvement.
- **Environmental Policy** – prepare a statement of commitment to the environment.
- **Organizational Roles, Responsibilities and Authorities** – ensure the responsibilities and authorities for relevant EMS.
- **Environmental Aspects –** identify the environmental aspects of WSL's operations and their effects on the environment.
- **Compliance Obligations –** identify and provide access to relevant environmental laws and regulations, voluntary commitments, and contractual relationships pertinent to WSL's environmental aspects.

- **Environmental Objectives –** set environmental goals consistent with the environmental policy that are monitored, communicated, and updated, as appropriate.
- **Planning Actions to Achieve Environmental Objectives** – determine what will be done, what resources will be required, who will be responsible, when it will be completed, and how the results will be evaluated.
- **Resources –** establish the resources needed for implementation, maintenance, and continual improvement of the EMS.
- **Competence –** determine necessary competence and ensure that employees and contractors are aware and capable of fulfilling their environmental responsibilities.
- **Awareness –** ensure awareness of the environmental policy, significant environmental aspects, environmental performance, and environmental compliance.
- **Internal Communication** – develop procedures for internal communications on environmental management issues.
- **External Communication –** develop procedures for external communications relevant to the EMS and as required by compliance obligations.
- **Documented Information** – maintain information determined to be necessary for an effective EMS.
- **Control of Documented Information** – provide for the effective management of procedures and other documents so that documents are distributed, stored, controlled, and retained as appropriate.
- **Operational Planning and Control** – establish, implement, control, and maintain the processes needed to meet EMS requirements and actions to address risks and opportunities.
- **Emergency Preparedness and Response** – develop and periodically test, review, and revise procedures for preventing and responding to potential environmental-related emergencies.
- **Monitoring, Measurement, Analysis, and Evaluation –** monitor key activities and track environmental performance including periodic compliance evaluations.
- **Evaluation of Compliance** – develop procedures to periodically evaluate environmental compliance and take actions, if needed.
- **Internal Audit Program** – conduct internal audits at planned intervals to evaluate EMS effectiveness.
- **Management Review** – review the EMS at planned intervals to ensure its continuing suitability, adequacy, and effectiveness.
- **Nonconformity and Corrective Action** – identify and correct environmental problems and prevent recurrences.
- **Continual Improvement** – review and improve the EMS as needed to enhance environmental performance.

Upon completion of a draft EMS Manual, CEC will provide the document to WSL for review and comment. CEC has anticipated and budgeted two (2) rounds of comments and revisions between CEC and WSL to reach a finished EMS Manual. CEC will finalize the document once all comments and proposed revisions have been addressed. CEC will then spend one (1) additional day on-site to assist WSL with implementation of the EMS Manual.

3.0 COST ESTIMATE, SCHEDULE, AND TERMS AND CONDITIONS

CEC is prepared to begin these services upon receiving authorization to proceed. CEC assumes the services described under Task 1 can be completed within approximately six (6) weeks. The final report described under Task 2 can be prepared within two (2) weeks of receiving the required follow-up information. As required by the COA, the services under Task 4 must be completed within 60 days of execution of the COA. Therefore, Task 4 will be completed by December 31, 2023.

Please note, costs, terms and conditions have been hidden for purposes of keeping the consultant's rates private.

4.0 CLOSING

CEC appreciates the opportunity to submit this proposal and looks forward to continuing our work with you on this project. If you have questions, or require additional information, please call us at (724) 327-5200.

Very truly yours,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

Jill R. Hamill, P.E.
Project Manager

David J. Larson
Principal

JRH:DJL/jg
Attachments

P-334863.N17/P

WESTMORELAND SANITARY LANDFILL
CONSENT ORDER AND AGREEMENT
(EXECUTED NOVEMBER 1, 2023)

EMS AUDITOR CONSULTANT PROPOSAL

November 30, 2023
Proposal No. 020543223

Brian E Stewart, PE
VP Engineering
Noble Environmental
111 Conner Lane
Belle Vernon, PA 15012-4569

Subject: Proposal to Prepare an Interim Environmental Assessment Report, Develop an EMS Manual, and Perform EMS Audit
Westmoreland Sanitary Landfill, PA

Dear Mr. Stewart:

SCS Engineers presents this proposal and our qualifications in response to the request to perform any of the following tasks mentioned in the November 1, 2023, Consent Order and Agreement (COA) issued by the Pennsylvania Department of Environmental Protection (PADEP) to Westmoreland Sanitary Landfill (WSL):

1) Complete an Interim Environmental Assessment
2) Develop an EMS Manual
3) Perform Third-Party EMS Audit of the Westmoreland Sanitary Landfill

Our understanding is that the firm completing the EMS Manual may not complete the Interim Environmental Assessment or EMS Audit.

SCS has a multidisciplinary approach and a team of experts with skills and knowledge in environmental science, engineering, regulations, and auditing to assist WSL in performing environmental auditing. Our auditors are trained to conduct systematic assessments of environmental management systems and compliance with regulations. They understand auditing techniques, protocols, and best practices for gathering and analyzing data, documenting findings, and making recommendations for improvement.

Our experts will collaborate with you to assess the environmental performance of the landfill. Their primary objectives include identification of compliance issues, recommending corrective actions, and ensuring that the facility operates in an environmentally responsible and compliant manner.

SCOPE OF SERVICES

TASK 1: Third Party Environmental Audit

SCS commits to providing qualified Environmental Auditors in accordance with the conditions specified in the COA's ***Appendix A: Requirements for Third-Party Consultants***. Our auditors will conduct a comprehensive assessment of WSL's waste handling and operating systems, as well as evaluate air quality and surface water protective systems, at the facility, as follows:

1. **Detailed Outline.** As required by the COA, we will submit a detailed outline of the audit's key issues to be addressed to PADEP for approval by January 1, 2024 (60 days from execution of

COA). We will address outline deficiencies identified by PADEP within 15 days of receipt. This subtask will begin with identifying and understanding applicable environmental laws, regulations, permits, and requirements that pertain to the landfill. To this end, we will need a complete list of permits and operations at the facility by mid-December 2023.

2. **Complete Environmental Audit.** Completing the environmental audit involves a structured process to assess and evaluate WSL's environmental performance and compliance with permits and regulations. We will define the scope and objectives of the audit; assemble an audit team with the necessary expertise in environmental regulations, processes, and auditing techniques; and develop an audit plan that includes audit criteria, audit schedule, roles and responsibilities, and resources required. Assessment will include the following items listed in Paragraph 8.a of the Order:

    - Review of changed or improvements proposed and/or implemented in accordance with Solid Waste Permit Modification #1 and Solid Waste Permit Modification #2, if applicable.
    - Changes or improvements proposed and/or implemented in accordance with the February 2021 Corrective Action Plan.
    - Changes or improvements proposed and/or implemented in accordance with the October 2022 Corrective Action Plan.
    - Status of and opportunities to optimize, enhance and address deficiencies in:
        a) Waste handling procedures and operating systems, including but not limited to prevention of off-site odors and tracking of dirt/mud/waste out of the landfill.
        b) Minimization of contaminant emissions (criteria pollutants, hazardous air pollutants, and greenhouse gases) from the landfill.
        c) Surface water protective systems (in accordance with the Clean Streams Law and its regulations).

    We will conduct an on-site visit to observe operations and collect data related to environmental performance to include review of environmental monitoring records, emissions data, waste disposal records, and any other relevant documentation, and interview of employees and management to gather information and insights into environmental practices.

    The audit will begin with an opening conference to introduce our audit team, describe the purpose of the audit and topical areas included in the audit, and discuss the anticipated schedule. The SCS Audit team will review permit applications and issued permits, inspection records, and regulatory reports, perform a facility "walk-through," and conduct interviews of facility personnel. We will evaluate WSL's compliance with applicable environmental laws, regulations, permits, and internal policies; identify instances of non-compliance and assess their significance and potential impact; and assess WSL's environmental performance against established objectives, targets, and key performance indicators.

    At the conclusion of each day, the audit team will debrief Noble personnel, including our findings and follow-up items. At the conclusion of the audit SCS will provide a summary of our findings, suggestions for improvements, and recommended corrective actions.

3. **Prepare Interim EA Report (Within 90 Days of Outline Approval):** An Interim Environmental Audit (EA) Report will be submitted to PADEP within 90 days of outline approval. This report will provide a comprehensive overview of the audit process, protocols followed, audited sites and locations, reviewed files, obtained data, samples, and interviews conducted.

   The Interim EA Report will identify items not in compliance with relevant laws, regulations, or permit requirements. Additionally, it will highlight potential violations and areas of environmental concern. Our report will include recommendations to rectify these non-compliance issues and areas of concern.

4. **Final EA Report Submission (Within 120 Days of Outline Approval):** We will submit both the Interim EA Report and the Final EA Report simultaneously to PADEP, Rostraver Township, and WSL within 120 days following PADEP's approval of the audit outline. The Final EA Report will detail changes, progress, corrections, or improvements initiated or completed by WSL since the Interim Report.

5. **PADEP Review.** If PADEP identifies deficiencies in the Final EA Report, we will promptly amend and resubmit the Final EA Report, fully addressing the deficiencies, within 15 days of receiving feedback.

6. **Correction Plan and Schedule Submission (Within 30 Days of Final EA Report Submission):** Within 30 days of submitting the Final EA Report, WSL is required to present to PADEP a comprehensive plan and schedule to rectify remaining non-compliance or areas of concern identified in the Final EA Report. We will assist you with developing the Correction Plan.

We understand the critical importance of this environmental audit in responding to the COA. Our team of auditors possesses the expertise and experience necessary to conduct a thorough and impartial assessment, working closely with WSL to achieve compliance. SCS will establish specific environmental objectives and targets aimed at reducing or mitigating the identified significant environmental impacts and ensure that objectives and targets are measurable, and time bound.

Our approach will be in accordance with the COA's requirements and will prioritize transparency, accuracy, and timely reporting. We are fully committed to collaborating with PADEP, Rostraver Township, and WSL to achieve the objectives outlined in the COA.

Task 2: Prepare an Environmental Management System (EMS) and Incorporate into an EMS Manual

Preparing an Environmental Management System (EMS) and developing it into an EMS Manual involves a structured and systematic process. An EMS is a framework that will help WSL manage their environmental responsibilities effectively.

The commitment from top management is essential to develop an environmental policy statement that reflects the organization's commitment to environmental protection and compliance with relevant laws and regulations.

We understand the EMS will focus on a long-term plan for achieving and maintaining compliance with the Solid Waste Management Act, Clean Streams Law, Air Pollution Control Act/Clean Air Act,

and other applicable permits, plan approvals and environmental regulations, including procedures for the following:

- Root-cause analysis of non-compliance
- Implementation of regulatory, permit and COA requirements
- Environmental record-keeping including records of corrective actions taken to ensure compliance
- Amending and updating the EMS, each year for three years from the date of the COA

An SCS EMS manager will oversee the development process. SCS will define the scope of the EMS, including the organizational boundaries it covers. The EMS Manual will have a schedule for each of the described systems and subsystems and a final deadline to fully implement the EMS, no later than twelve (12) months from the date of the COA.

SCS will assist WSL in implementing the plan within 30 days of PADEP approval of the manual as required by the COA and in accordance with the schedule provided in the EMS Manual. We note that WSL must make the manual available to responsible employees to use as a reference document to understand the organization's environmental management processes, procedures, and policies.

Beginning one year after approval of the EMS Manual and until the end of the COA[1] , SCS will meet with WSL staff responsible for environmental compliance every six months to ensure compliance with the EMS Manual. If there are noncompliance issues, SCS will assist WSL in preparing an annual certification, an explanation of the cause of the noncompliance, remedial steps taken to address the noncompliance, and a date that compliance was achieved.

Preparing an EMS and developing it into an EMS Manual is a dynamic process that requires ongoing commitment and engagement from all levels of the organization. It will help WSL manage environmental risks, improve performance, and demonstrate their commitment to environmental stewardship.

Task 3: Conduct EMS Audit

SCS will conduct an EMS audit no sooner than 3 months and no later than 9 months after approval of the EMS Manual completed under **Task 2**. Our auditors will evaluate the adequacy of EMS implementation relative to the EMS Manual and identify items that are not in compliance with law, regulation or permit requirements and items that have potential to violate law, regulation or the permit or cause environmental degradation. SCS will evaluate each major organizational unit with responsibilities that fall under the EMS Manual, from top management down.

We request that the completed EMS Manual be provided to us along with appropriate compliance documentation for the landfill at least two weeks prior to the scheduled date of the audit. The audit will begin with an opening conference to introduce our audit team, describe the purpose of the audit and topical areas included in the audit, and discuss the anticipated schedule. The SCS Audit team will review samples of EMS inspection records, regulatory reports, perform a facility “walk-through,”

[1] The COA terminates when PADEP determines in writing that WSL has complied with all the terms of the Consent Order and Agreement, including the payment of all penalties, or such earlier time as PADEP determines in writing that termination is in the best interests of human health and the environment.

and conduct interviews based upon the applicable regulatory obligations listed in the EMS Manual considering its applicability to the facility's operations.

At the conclusion of each day, the audit team will debrief Noble personnel, including our findings and follow-up items. At the conclusion of the audit SCS will provide a summary of our findings, suggestions for improvements, and recommended corrective actions.

Although the EMS Audit, according to the COA, is to be conducted in accordance with ISO 19011 (First Edition, 2002-10-02), we note the latest version is "ISO 19011:2018 Guidelines for Auditing Management Systems." SCS will follow the latest version of ISO 19011 unless otherwise directed. This guidance will be adapted as appropriate to the scope, complexity and scale of the audit program.

The audit scope will encompass a comprehensive examination of various aspects, including the physical and virtual locations, functions, organizational units, activities, processes, and the time under consideration. This entails the development of the following key elements, at a minimum:

- Assessment of the extent to which the system, subsystem, program, or task has been implemented and is being maintained
- Evaluation of the adequacy of internal self-assessment procedures for programs and tasks
- Examination of the effectiveness of reporting methods for conveying environmental concerns to both WSL management and the PADEP
- Analysis of whether WSL effectively communicates environmental requirements, including those outlined in the COA, to its staff working on-site
- Verification of WSL's measures to ensure that contractors and consultants receive comprehensive training to comply with and adhere to any environmental obligations associated with their work for the organization
- Assessment of whether any further enhancements are necessary in WSL's written requirements or procedures to better facilitate compliance with the EMS Manual
- Investigation of any observed deviations from WSL's written requirements or procedures in practical implementation

SCS will prepare an initial EMS audit report within 60 days of completion of the EMS Audit, and a Final EMS Audit Report within 30 days thereafter.

The Final EMS Audit Report will contain, at a minimum:

- A summary of the audit process, including any obstacles encountered
- Identification of areas of concern addressed during the audit
- Changes, progress and/or improvements to the issues raised in the Interim Audit Report that WSL has initiated and/or completed since the Interim Audit Report
- Recommendations for resolving any areas of concern
- A copy of the Initial EMS Audit Report

An audit "finding" is a documented conclusion of conditions at the time of the audit based on objective, verifiable evidence gathered during the audit process. Findings will be included in an Excel spreadsheet and dated based on the date in which the audit team collectively confirmed the deficiency to be a finding.

The SCS EMS Auditor will provide the Final EMS Audit Report simultaneously to WSL and PADEP within seven days of completion.

CONTRACT AWARD

Upon contract award, the SCS Team will schedule a project initiation meeting (i.e., kick-off meeting) with you via Microsoft Teams to review the selected scope of services, proposed schedule, budget, deliverables, and frequency/method of communication. The purpose of this meeting is for all Noble's Audit Team members to review/confirm expectations and requirements for completion of this audit program and development of the EMS manual.

STATEMENT OF QUALIFICATIONS

Firm Overview

SCS is an independent, employee-owned environmental engineering, construction, and operation and maintenance (O&M) services firm. Founded in 1970, SCS has focused on the solid waste management and site remediation industries. The firm has grown to a staff of 1,200 engineers, geologists, scientists, constructors, and technicians with offices located throughout the United States.

We specialize in solid waste and hazardous waste engineering services for local government and private industry clients and are recognized worldwide for our work. This recognition is the result of successfully completing thousands of complex and innovative solid waste and material management projects. We have been consistently ranked the number one solid waste consulting firm in the United States by Engineering News Record.

SCS applies a combination of skills and experience in engineering, natural and physical sciences, construction, project management, and operations to support the needs of our solid waste clients and enhance project value.

Environmental Services

SCS Engineers solves environmental management, solid waste, hazardous waste, and Superfund problems. Approaches we pioneered include risk-based cleanups, voluntary cleanups, accelerated investigations, presumptive remedies, environmental management systems, and waste minimization. These approaches are at the forefront of Federal environmental programs today. From our earliest days as a company, SCS has been active in helping industrial, commercial, and institutional companies, military facilities, federal, state, and local governments, and tribes to identify and implement proper environmental management practices.

Our Environmental Services Practice

- Environmental Compliance Audits
- Environmental Investigations and Monitoring
- Phase I and Phase II Site Assessments
- Environmental Investigations and Monitoring
- Phase I and Phase II Site Assessments
- Stormwater Permitting, Management and Compliance
- Spill Prevention, Control and Countermeasures (SPCC) Plan
- RCRA/CERCLA Services
- Human Health and Ecological Risk Assessments
- Voluntary Remediation & Brownfield Redevelopment
- Hazardous Waste Planning
- Underground & Aboveground Storage Tanks
- Education and Outreach
- PCB Management & Cleanup
- Industrial Hygiene Services
- Asbestos & Lead Paint Inspections & Management Plans
- Sustainability Planning
- Energy Auditing and Retro-commissioning
- Waste Management Planning

MULTIMEDIA ENVIRONMENTAL REGULATORY COMPLIANCE & PERMITTING

SCS's multimedia environmental regulatory compliance and permitting experience consists of a full range of federal, state, and local regulatory programs for air, water, and waste. Our clients include industrial, commercial, governmental, and other institutional entities. Our primary focus is on the applicability, compliance, record-keeping, and training related to the following regulatory programs:

- Clean Water Act (CWA)
- Clean Air Act (CAA)
- Oil Pollution Act (OPA)
- Resource Conservation and Recovery Act (RCRA)
- Emergency Planning and Community Right-to-Know Act (EPCRA)

SCS personnel are experienced at conducting multimedia assessments to address both regulatory compliance and "beyond compliance" (best management practice) aspects. Often, compliance auditing projects are performed for our client's counsel, to protect the confidentiality of the audit process and findings. Assessments can be tailored to include continuous improvement provisions under ISO 14001, OHSAS 18001, or ISO 50001, or to address specific sustainability initiatives established by the client.

In our company's 53-year history, we have completed hundreds of environmental audits for a broad range of clients. These audits have included applicable federal, state, and local regulations, internal standard operating procedures and guidance manuals, external commitments (e.g., ISO 14001 and ISO 50001), etc. During these audits, we have relied on different standards and programs, including ASTM E2107-20, ISO 19011:2018, and others.

PROJECT TEAM

SCS has assembled a team that possesses a diverse and complimentary background specific to landfills and the audit elements including air, NPDES water, landfill leachate and treatment systems, stormwater management, intermediate landfill slope and cover requirements, and general waste management practices. Resumes for team members are provided in **Attachment A**.

DENISE WESSELS, P.E., BCEE | PROJECT MANAGER

Ms. Wessels is a Vice President and Project Director with the Landfill Engineering Group in our Denver, PA office. She has 30 years of experience in the waste management industry and environmental consulting, including landfill design, project management, regulatory compliance, permitting, environmental monitoring and studies, auditing, and budgeting. She has conducted a comprehensive environmental compliance audit covering solid waste, hazardous waste, air, surface water discharge, and industrial discharge regulations and permits. She is a registered Professional Engineer in Pennsylvania and a Board-Certified Environmental Engineer.

JACOB W. SHEPHERD, P.E. | PROJECT MANAGER

As a Project Manager, Mr. Shepherd is responsible for air compliance and landfill gas engineering throughout the mid-Atlantic. He has completed air permitting and compliance work for Noble and has extensive experience with landfill air compliance in Pennsylvania. Mr. Shepherd's projects have included environmental engineering, air compliance, renewable energy, landfill and landfill gas engineering, and environmental services. He is currently the legislative liaison for SWANA Mid-Atlantic and a regional expert in air permitting and compliance throughout Maryland, Pennsylvania, Virginia, and West Virginia, including federal Clean Air Act programs (NSPS, NESHAP, PSD, and NSR), RICE engine programs, and state regulatory programs. He is a registered Professional Engineer in Pennsylvania.

CHRISTINA M. HELMS, P.G., LSRP | PROJECT MANAGER

As a Project Manager, Ms. Helms has 17 years of technical and environmental consulting experience as a geologist, often serving as a project manager, senior technical advisor, and/or Licensed Site Remediation Professional (LSRP) on national, regional, and local environmental projects for solid waste, commercial real estate, residential housing, industrial/manufacturing, mining, and energy utility clients. Her project experience ranges from fast-paced due diligence for property transactions to long-term, multi-year projects with ongoing monitoring and reporting needs and requirements for sites with soil, groundwater, and air impacts. She is a registered Professional Geologist in Pennsylvania and Licensed Site Remediation Professional in New Jersey.

MICHAEL J. MORAWSKI | PROJECT MANAGER
Mr. Morawski is a Project Manager based in the Denver, Pennsylvania office. In his time with SCS, he has prepared numerous facility emergency response plans and oil spill prevention plans. He has developed compliance plans and assisted with permitting for landfills, waste hauling facilities, U.S. Coast Guard regulated marine transfer facilities, US EPA regulated on-shore petroleum storage facilities, and chemical storage facilities.

ESTIMATED COSTS

The above work will be performed on a time-and-materials basis. Our project fee estimate, provided in **Attachment B**, shows a breakdown of estimated costs for each task. Rates shown are SCS Contract Rates for work on this project through project completion, assuming a completion date by December 2024.

Our fee estimate is based on the following assumptions.

- In preparation for the audit, we will be provided applicable documentation at least two weeks prior to the site visit. For example, current solid waste/landfill permit, NPDES permit, odor management plan, all applicable management plans and/or SOPs (e.g., for waste screening, waste handling, LF operations, etc.), permit modifications, current landfill design plans, Corrective Action Plan (2022), etc. Delays in returning the requested documents could result in a delay of the onsite audits.
- SCS assumes we will be provided timely and efficient access to the facilities, applicable staff, and documentation during the scheduled onsite activities. Delays or lack of access could negatively impact the overall quality of the audit and extend the expected timeline.
- Task 1 assumes the audit team consisting of two to three professionals will visit the site for up to 5 days to perform the onsite components of the audit. Task 3 assumes the audit team consisting of one to two professionals will visit the site for up to 2 days to perform the onsite components of the audit. If additional time is required, additional fees may be incurred.

CLOSING

We appreciate the opportunity to provide this proposal to you. If you have any questions regarding this proposal, please feel free to contact either of us.

Sincerely,

David L. Palmerton, PG
Project Director
SCS Engineers
dpalmerton@scsengineers.com

Denise Wessels, P.E., BCEE
Vice President
SCS Engineers
dwessels@scsengineers.com

Attachments:
A: Resumes
B: Fee Estimate

ATTACHMENT A

RESUMES

DENISE WESSELS, PE, BCEE

Education

M.S. - Environmental Science, Indiana University, 2003
B.S. - Civil Engineering, The Pennsylvania State University, 1993

Professional Licenses

Professional Engineer, Pennsylvania, Maryland, New Jersey

Professional Affiliations

Pennsylvania Waste Industries Association
Solid Waste Association of North America – Keystone Chapter – President

Professional Experience

Ms. Wessels is a Vice President and Project Director with the Landfill Engineering Group in our Denver, PA office. She has 30 years of experience in the waste management industry and environmental consulting, including landfill design, project management, regulatory compliance, permitting, environmental monitoring and studies, auditing, and budgeting. Examples of her project experience include:

Landfill Engineering

Prince George's County, MD, Brown Station Road Landfill. Conducted a comprehensive environmental compliance audit covering solid waste, hazardous waste, air, surface water discharge, and industrial discharge regulations and permits.

Confidential Locations in Pennsylvania, Confidential Client. Conducted file review and site visits to identify possible environmental liabilities at two landfills in conjunction with a potential merger by a publicly-listed company.

Confidential Location, PA. Conducted a landfill development evaluation for a potential 130-acre non-contiguous landfill expansion. Work involved evaluating siting criteria and setbacks established in PA Solid Waste Management Regulations, identification of critical issues, preparation of a conceptual site plan with base grades and final cover grades, and estimation of potential airspace, construction costs and soil balance.

York, PA, Modern Landfill. Prepare Annual Operation Reports, including density calculations, disposal summary, site plans, and cross-sections. Other activities have included preparing semi-annual airspace calculations, assistance with engineering budget model, and creating compliance tasks for applicable federal, state and local regulations.

Morgantown, PA, Conestoga Landfill. Created compliance tasks for applicable federal, state and local regulations.

Perry Hall, MD, Honeygo Run Reclamation Center. Oversaw stormwater monitoring, and created compliance tasks for applicable federal, state and local regulations.

Blythe Township, PA, BRADS Landfill. Project Director for various engineering assignments including:

- Compliance activities including groundwater monitoring data evaluation, perimeter landfill gas probe monitoring, NPDES permit compliance, solid waste Minor permit modifications for hauling leachate and updating the radiation monitoring plan, permit application for off-site leachate treatment, preparing PPC/SPCC Plan, groundwater well decommissioning.

- Construction bid package to include technical specifications and construction plans for the 8-acre Cell 2A synthetic lined bottom liner system and new stormwater management pond. Work included preparation of construction plans and specifications, construction quality assurance plan, bidding assistance and construction engineering.

Lebanon, PA, Greater Lebanon Refuse Authority Landfill. Project Manager for various engineering assignments including:

- Construction bid package to include technical specifications and construction plans to complete waste mining and screening on 200,000 CY of waste from an unlined landfill with recovery of soils and redeposition of waste in a lined landfill.

- Phase I and II Major Permit Amendment for 47-acre landfill expansion, a portion of which piggybacked over an unlined municipal solid waste landfill, including "Settlement Accommodation Plan" which allows filling above final grades in anticipation of settlement to maximize airspace utilization

- Construction bid package to include technical specifications and construction plans for the 8-acre Pad 8 double-synthetic lined bottom liner system, perimeter roads and new stormwater management ponds. Work included preparation of construction plans and specifications, construction quality assurance plan, bidding assistance and construction engineering.

- Construction bid package to include technical specifications and construction plans to complete final closure on approximately 17 acres of the landfill. Certifying engineer for construction quality assurance monitoring of the closure construction.

Narvon, PA, Lanchester Landfill. Project Manager for various engineering assignments including:

- Phase I and II Major Permit Amendment for Area F landfill expansion, a portion of which piggybacked over a lined municipal solid waste landfill

- Certifying Engineer for two final cover construction projects using Closure Turf alternative final cover and the Agru Integrated Drainage System alternative final cover. Construction activities included preparation of subgrade, installation of 50-mil LLDPE Super Gripnet geomembrane, geotextile, and final cover soils. During construction, modifications to the existing landfill gas system were made.

- Design Engineer for the 9-acre Area E, Cell 2A double-synthetic lined bottom liner system. Work included preparation of construction plans and specifications, construction quality assurance plan, bidding assistance and construction engineering.

York, PA, Magnesita Refractories Residual Waste Monofill. Project Manager for various engineering assignments:

- Phase I and II Major Permit Modification for a vertical expansion to increase disposal capacity by 375,000 cubic yards and provide an additional 75 years of landfill life.
- Construction engineering (construction plans and specifications, CQA oversight, construction certification report) for construction of the final disposal area perimeter berm for the residual waste monofill to comply with Mine Safety and Health Act (MSHA) regulations

Landfill Gas

Pine Grove, PA, Pine Grove Landfill. Plan Approval Application prepared for a landfill expansion which also included the replacement of two 2,000 cfm enclosed ground flares with one 5,000 cfm enclosed ground flare. Prepared the PADEP Department of Solid Wastes Form K (Gas Management) and Form G(B) (NMOC Emission Estimates) in support of the Pad 12 Expansion permit application.

Greencastle, PA, Mountain View Reclamation Landfill. Prepared a minor permit amendment, including PADEP Department of Solid Wastes Form K (Gas Management), for landfill gas flare No. 2.

Bethlehem, PA, IESI PA Bethlehem Landfill. Prepared permitting documents necessary for expansion of the landfill, including PADEP Solid Waste Forms, G(A), G(B) and Form K. Prepared annual Title V Certification Report, and Semi-annual Operational Reports for NSPS and NESHAP, and completed a Title V renewal application.

Birdsboro, PA, Pioneer Crossing Energy, LLC. Prepared a Municipal Waste General Permit Application and Renewal Application for a landfill-gas-to-energy beneficial use project at Pioneer Crossing Landfill.

Birdsboro, PA, Western Berks Community Landfill. Project Manager and Lead Engineer for preparing permitting documents necessary for expansion of the landfill, including PADEP Solid Waste Form G(B) and Form K, and air plan approval application. Work involved creating a master plan of the existing landfill gas control and collection system (GCCS), designing the GCCS in the expansion areas, and preparing an operations manual for the system.

Environmental Services

Spill Prevention, Control and Countermeasures (SPCC) Plans. Prepared SPCC Plans for various sites throughout Pennsylvania, Maryland, Connecticut and Virginia.

Stormwater Pollution Prevention Plans (SWPPPs). Prepared SWPPPs for various sites throughout Pennsylvania, Virginia, Maryland, Connecticut and Massachusetts.

JACOB W. SHEPHERD, P.E.

Education

MS – Environmental Science and Engineering, Virginia Tech, December 2011

BS – Environmental Science, University of Mary Washington, May 2010

Professional Licenses

Professional Engineer – Virginia and Maryland

Professional Affiliations

Legislative Liaison – Mid-Atlantic Chapter – Solid Waste Association of North America

Professional Experience

As a Senior Project Professional, Jacob Shepherd is responsible for air compliance and landfill gas engineering throughout the mid-Atlantic. Since starting with SCS in 2012, Mr. Shepherd's projects have included environmental engineering, air compliance, renewable energy, landfill and landfill gas engineering, and environmental services. As the legislative liaison for SWANA Mid-Atlantic, he is a regional expert in air permitting and compliance in Maryland, Pennsylvania, and Virginia, including federal Clean Air Act programs (NSPS, NESHAP, PSD, and NSR), RICE engine programs, and state regulatory programs.

Facilities have included landfills ranging from low-capacity rural landfills to large full-scale resource management facilities, renewable energy facilities, and commercial facilities. Specific experience covers design of landfill gas systems, design and maintenance of landfill management systems, permitting of various air emission sources, and data analysis. He also has experience in monitoring and testing of landfills, operations of landfill gas collection and control systems, monitoring of perimeter probe networks, and monitoring of groundwater and surface water. Notable projects include:

Republic Services Modern Landfill, York, PA – Supported air permitting for the renewal of the facility Title V air permit and an Air Plan Approval for construction of a new utility flare, including calculating potential emissions, completing the required forms, determining the applicability of combustion devices to NESHAP RICE requirements, and coordinating with PADEP. Completed and submitted Title V compliance and AIMS emissions reporting, including compiling and analyzing flare and site testing data. Developed a facility site plan to update GCCS piping layout and conducted a hydraulic analysis of the current GCCS to locate low-functioning header pipes to be replaced.

IESI Blue Ridge Landfill, Chambersburg, PA –Prepared an application to renew the facility Title V Operating Permit, including performing calculations and completing application forms. Gathered and analyzed site data and prepared Title V compliance reports, including semi-annual compliance and operating reports and annual compliance and emissions reporting. Compiled LFG flow data and available testing results to complete and submit the AIMS emissions reporting. Prepared a Startup, Shutdown, Malfunction (SSM) plan for NESHAP compliance.

IESI Bethlehem Landfill, Bethlehem, PA – Analyzed site data and prepared Title V and NSPS-MACT semi-annual and annual compliance reports to submit to PADEP. Completed a request for determination (RFD) application for a landfill odor-control system and submitted to PADEP.

PPL Renewable Energy Cumberland Landfill, Shippensburg, PA – Completed Title V renewal application for a four-engine renewable energy plant utilizing four LFG-fired CAT 3520 engines for the production of electricity, including interfacing with clients and regulators, performing emission calculations, and completing renewal application forms.

Waste Management Grand Central Sanitary Landfill, Pen Argyl, PA – Acted as project manager, supervising various reporting of emissions and CAA compliance. Completed various monthly, annual, and quarterly LFGE and Title V air compliance and AIMS emissions reporting. Coordinated with the PADEP Stack Testing Group to achieve approval of flare stack testing results.

Waste Management Pottstown Landfill, Pottstown, PA – Prepared and submitted an Air Plan Approval application for the construction of a LFG-fired utility flare, including performing calculations, completing the application and all supporting documentation, and coordinating with PADEP. Assisted with the submission of a minor modification to remove LFG control devices from the site.

Waste Management Dauphin Meadows LF - Millersburg, PA – Supported air permitting for a new utility flare to be constructed to improve LFG control, including calculating potential emissions and coordinating with PADEP regulators. Completed the renewal for the state operating permit for the landfill.

Green Gas Pioneer Crossing Landfill, Birdsboro, PA – Prepared an Air Plan Approval to construct a new utility flare improve LFG control, including calculating potential emissions and completing forms. Prepared Title V compliance reports, including emissions reports and semiannual and annual NSPS reports.

McKean County Landfill, Kane, PA – Completed compliance reporting for the wellfield and LFGE project, including emissions reports and semiannual and annual NSPS reports, and compiled and analyzed LFG flow data.

Noble Mountainview Landfill, Frostburg, MD – Prepared a renewal of the facility Title V (Part 70) Operating Permit, including gathering site information, completion of MDE permit forms, and preparing an application package to submit to MDE. Prepared Title V compliance reports, including semiannual and annual monitoring reports and annual emissions reports. Prepared annual NMOC emissions reports to demonstrate emissions below the NSPS threshold.

Anne Arundel County Millersville Landfill, Millersville, MD – Acted as project manager for air compliance and reporting projects. Prepared and submitted a renewal application for the site Title V (Part 70) Operating Permit. Provided compliance reporting services, including NSPS reports, Title V reports, and GHG reporting. Analyzed the NESHAP compliance requirements and conducted a facility audit for the LFGE facility utilizing 2 LFG-fired RIC engines. Tested site LFG for feasibility for a compressed natural gas (CNG) refueling station for the waste management fleet and shipped samples to the laboratory as "dangerous goods."

Montgomery County Gude Landfill, Rockville, MD – Compiled wellfield monitoring data and LFGE plant data and completed Title V compliance reports, emissions reporting, GHG emission reports, and monthly O+M reporting. Provided support for the operations of a one-engine renewable energy plant, including monitoring engine data, compiling data, performing emissions and flow calculations,

and completing reporting for utility compliance, Title V, and GHG compliance. Provided O+M support and assistance and provided QA during extraction well installation.

Alpha Ridge Landfill, Marriottsville, MD – Tested site LFG using EPA Tier 2 procedures, shipped samples to an environmental laboratory, and completed the associated reporting.

Brown Station Road Landfill, Upper Marlboro, MD – Compiled chart recorder data and applicable analyses and wrote and submitted compliance reports for GHG reporting and Title V reporting. Managed flare and wellfield operations in support of field staff and monitored gas quality in LFG extraction wells.

Sandy Hill Creative Disposal Project, Bowie, MD – Supported compliance reporting including Title V reports, GHG reporting and MDE-required reporting. Monitored the leachate collection network to verify proper operation of liquid management system. Compiled the liquid extraction and hauling data monthly to determine monthly volumes handled by the system. Conducted monitoring and testing from the gas extraction system including extraction wells and header collection piping.

Montgomery County Oaks Landfill, Laytonsville, MD – Compiled and analyzed laboratory and flow data and completed reporting for Title V and GHG compliance. Provided O+M support and assistance, supported LFGE, tested vacuum and efficiency of extraction wells, and monitored gas quality in extraction wells. Provided support for the operations of the two-engine renewable energy plant, including monitoring engine data, compiling data, performing emissions and flow calculations, and completing reporting for utility compliance, Title V, and GHG compliance.

Bush Valley Landfill, Abingdon, MD – Tested and monitored site LFG for EPA CERCLA compliance, compiled data and performed trend and statistical analyses, and completed associated reporting to submit to EPA.

Loyola University, Baltimore, MD – Installed LFG monitoring probes and conducted regular monitoring using a GEM 2000 portable gas analyzer.

Spencers Rubble Landfill, Abingdon, MD – Conducted monitoring of LFG perimeter monitoring probes and compiled results of monitoring.

CHRISTINA M. HELMS, P.G., LSRP

Education

BS – Geology - Lafayette College, 2006

Professional Licenses

Professional Geologist - Pennsylvania (PG005006)
Licensed Site Remediation Professional – New Jersey (#668285)

Specialty Certifications

OSHA 40-hour HAZWOPER

Professional Affiliations

NJ Licensed Site Remediation Professionals Association (LSRPA)

Professional Experience

As a Project Manager, Christina Helms is responsible for leading, growing, and managing SCS's environmental services practice in the greater Pennsylvania, New Jersey, and Maryland area. Ms. Christina Helms has 17 years of technical and environmental consulting experience as a geologist, often serving as a project manager, senior technical advisor, and/or Licensed Site Remediation Professional (LSRP) on various national, regional, and local environmental projects for private sector clients in various markets including commercial real estate, residential housing, industrial/manufacturing, mining, and energy utilities.

Her project experience ranges from fast-paced due diligence for property transactions to long-term, multi-year projects with ongoing monitoring and reporting needs and requirements for sites with soil, groundwater, and air impacts. Ms. Helms has handled the day-to-day field staffing, office coordination, and contract management for these projects that ranged from tens of thousands to multi-million-dollar environmental remediation projects in PA and NJ. Notable projects that Ms. Helms has been involved in are described below.

Due Diligence

Southeastern PA, Confidential Client, Due Diligence in North Penn Area 7 Superfund Site. Ms. Helms was the senior reviewer and provided client management services for an ASTM E1527-21 Phase I Environmental Site Assessment (Phase I ESA) and subsequent Phase II activities for a site located within the North Penn Area 7 Superfund Site. The project involved coordination with the client and their attorney to develop multiple warehouses at a former industrial facility whose historical operations contributed to contaminating groundwater, primarily with volatile organic compounds. Because the project was located within a Superfund site, with ongoing groundwater monitoring and active soil remediation being conducted by the responsible party, Ms. Helms and her project team also assisted with US EPA coordination in seeking a Comfort Letter from the US EPA for the planned development.

New Castle, Delaware, Confidential Client, Airport Hangar Lease, Due Diligence. Ms. Helms was the senior reviewer and provided client management services for an ASTM E1527-21 Phase I

Environmental Site Assessment (Phase I ESA) and subsequent Phase II activities for a site located within the New Castle County Airport. At the time of the initial investigation, the airport had not yet become part of the East Basin Road Groundwater Superfund site (widespread PFAS and VOC impacts to groundwater), but based on correspondence and research at the time, Ms. Helms and her team were able to advise the client of that impending Superfund allocation. The client desired to lease the hangar and associated office space, therefore Phase II activities included a subsurface investigation of an oil water separator within the airplane hangar, as well as the recommendation for a vapor intrusion investigation, based on the known impacts to groundwater. Ms. Helms and her project team also assisted coordinating with the US EPA in seeking a Comfort Letter in this situation.

Berks County, Pennsylvania, Confidential Client, Due Diligence for Substation Expansion. Ms. Helms was the senior reviewer and technical advisor for an ASTM E1527-21 Phase I Environmental Site Assessment (Phase I ESA) and subsequent Phase II activities for a project that involved the planned expansion of an electrical substation. The Phase I ESA identified potential impacts both visually in the field and based on documents found during local and state file reviews. Phase II activities were conducted in a phased approach, based on the desire of the client, and included additional local and state file reviews, a geophysical survey, soil test pits, and soil sampling.

Philadelphia, Pennsylvania, Confidential Client, Due Diligence for Planned Mixed Use Building. Ms. Helms was the senior reviewer, technical advisor, and client manager for an ASTM E1527-21 Phase I Environmental Site Assessment (Phase I ESA) and subsequent Phase II activities for a planned mixed use (residential and commercial) redevelopment project. A Phase II subsurface investigation was conducted for underground copper lines associated with heating oil tanks that were found. The client also needed lead based paint (LBP) and asbestos containing materials (ACM) surveys which Ms. Helms and her team coordinated. Ultimately the client was provided with a budgetary estimate for potential remediation that would be required based on the findings of the Phase I/II activities.

Prior Experience

Aggregate Mining Projects

PADEP Mine Permit Applications for Large and Small Coal and Non-coal Surface Mining Operations. Experience included drafting in AutoCAD; developing, installing, and monitoring a surface and groundwater monitoring network; assisting with wetland delineation; responding to residential well and noise complaints and concerns; and eventually managing the overall submittal of the permit to the PADEP.

Mineral exploration projects. Field work included geologic exploration of sand and limestone for specific markets, including geologic field measurements, test hole drilling/cuttings sample collection, lab analysis of the sample material, data analysis, mineral processing design diagrams, and assisting with final presentation to client.

MICHAEL J. MORAWSKI

Education

M.B.A. – Finance, LaSalle University, 2005

B.S. – Geo-Environmental Science – Shippensburg University, 1996

Training / Certifications

40-hour Health and Safety Training OSHA 29 CFR 1910.120

Professional Experience

Mr. Morawski is a Project Manager with SCS Engineers based in the Denver, Pennsylvania office. In his time with SCS Engineers, he has prepared numerous facility emergency response plans and oil spill prevention plans. He has developed compliance plans for U.S. Coast Guard regulated marine transfer facilities, US EPA regulated on-shore petroleum storage facilities, chemical storage facilities and landfills. Mr. Morawski has managed projects, reviewed contract submittals for approval and prepared drawing sets in AutoCAD.

Examples of Mr. Morawski's project experience include:

Willow Glen Terminal, St. Gabriel, LA. Prepared environmental, health, safety, and security manuals for a new marine bulk petroleum storage terminal. Developed a combined Facility Response Plan (FRP) to meet both U.S. Coast Guard and US EPA regulations.. Authored a U.S. Coast Guard Operations (Ops) Manual and Facility Security Plan (FSP), a U.S. EPA Spill Prevention Control and Countermeasure (SPCC) Plan, as well as OSHA Hazardous Communication (HazCom) and Emergency Action Plans (EAPs). Work included conducting a site safety and security inspection, developing site drawings and figures, coordinating with federal agencies for plan approvals, and preparing Toxic Release Inventory (TRI)/ Tier II Reports.

BAE Systems, Jacksonville, FL – Developed a new US EPA Facility Response Plan consistent with the facility's existing SPCC, and U.S. Coast Guard FRP and Operations Manuals. Work included a site inspection, developing site drawings, conducting an environmental vulnerability analysis, and coordination with federal and state agencies.

Carpenter Company, Richmond, VA – Prepared a combined contingency plan in accordance with the SPCC regulations (40 CFR §112) promulgated by EPA, and the VDEQ ODC regulations (9 VAC 25-91-170). Work included the evaluation of secondary containment and spill control features; spill response equipment and spill response personnel training and confirmation of on-site petroleum storage inventory .

Griffith Energy, Annapolis MD - Prepared as-built drawings and piping details for an underground storage tank system at a bulk petroleum storage facility. Work included facilitating site meetings

and collecting and reviewing data for the preparation of plans to be submitted to the Maryland Department of the Environment (MDE).

Various Landfill locations in PA and MD. Prepared annual Tier II Reports in compliance with Section 312 of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA).

Prior Work History. Prior to joining SCS in March 2021, Mr. Morawski worked as an environmental consultant for twenty-four years. During that time he prepared hundreds of federal and state environmental compliance plans (SPCC, FRP, DPCC (New Jersey), SWPPP, PPC, SPR, ODCP), U.S. Coast Guard Operations Manuals, security plans (DHS Chemical Facility Security Plans), and facility fire action plans. Mr. Morawski developed Integrated Contingency Plans that provided multi-agency compliance for bulk liquid storage facilities. He interfaced regularly with government agencies to negotiate and resolve issues of potential non-compliance. Mr. Morawski also managed the acquisition of environmental permits (water, air, and waste) and storage tank construction permits. He conducted field permeability testing of aboveground storage tank containment systems, conducted soil and water sampling at underground storage tank sites, and modeled data utilizing AutoCAD platforms.