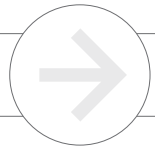


ALG

ASHWORTH
LEININGER
G R O U P

STATEMENT OF QUALIFICATIONS



Engineers, atmospheric scientists and compliance specialists providing resourceful environmental consulting to industry, trade associations and legal counsel.

Environmental Consulting Services



Ashworth Leininger Group was formed to offer expert air quality and environmental consulting services to a broad spectrum of clients – agencies, trade associations, and industry. For over 20 years, our firm has played a leadership role in securing new manufacturing capacity that realizes improved efficiency for our clients while providing significant reductions in environmental impacts.

ALG has helped develop and implement innovative equipment design and control strategies that represent some of the cleanest industrial and commercial facilities in the United States.

Our practical experience in engineering and compliance has allowed us to develop efficient and innovative environmental management systems that comply with applicable regulatory requirements, often resulting in significant savings to our clients.

ALG staff enjoy a rewarding and challenging work environment. We emphasize efficient team work, effective communication, supportive and flexible scheduling, and continuous improvement. This successful and clear vision is evidenced by our low employee turnover, which is a benchmark in our industry. Our clients recognize the benefits of our strategy: we continue to work today with the same suite of clients that helped establish our firm.

Finally, our principals have been admitted as expert witnesses and supported legal counsel in the defense of our clients' interests. Our vision is not simply to help our clients to comply with environmental regulations, but to design compliance strategies to optimize our clients' business objectives and achieve significant environmental benefits.



Client Benefits



ALG's business ethic and core strategy provides our clients with unique benefits:

- **Low overhead:** Our unique business strategy allows ALG to deliver highly skilled expert technical consulting at a reasonable cost.
- **Superior project management:** ALG budgeting, scheduling, and cost tracking programs are fully integrated into our consulting practice and allow our staff to deliver our work product within compressed schedules as necessary.
- **Partnering:** We partner with our clients to define levels of effort that match our clients' requirements and expectations. This allows direct cost control, leverages our clients' expertise, and improves project execution.
- **Innovation:** Our clients rely on ALG to craft clever and pragmatic solutions to environmental challenges. Our innovation derives from a solid understanding of the underlying science, a command of the applicable regulatory

requirements and interpretations, a practical technical understanding of our clients' operations, and a demonstrated ability to navigate through the federal, state, and local regulatory bureaucracies.

These four principles guide our practice. Our focus remains fixed on the client's objectives, whether it is to secure new production capacity, improve the efficiency of environmental management programs, or resolve potential compliance issues. For over 20 years, our clients have relied on ALG to craft client-focused, cost effective, and resourceful solutions in support of their environmental management programs, regulatory advocacy, and corporate growth objectives. We encourage you to visit our website (www.algcorp.com) and Testimonials page to gauge how ALG staff and our unique approach to environmental consulting exceed our clients' expectations.

Facility Permitting

Air Quality Permitting

- Preparation and negotiation of complex air permits under New Source Review (NSR), Prevention of Significant Deterioration (PSD), and local air toxic programs
- Determination of appropriate control technology under BACT/ LAER/TBACT requirements
- Ambient air quality impact analyses
- Emission offset trading and certification
- Air toxics health risk assessment studies
- Emission quantification and source testing
- GHG inventory reporting and auditing
- Title V permitting and implementation
- CEMS certification and compliance testing

Environmental Impact Statements and Reports

- Preparation of focused air quality studies and Health Risk Assessments (HRAs)
- Preparation and critical review of Draft and Final Environmental Impact Statements/Reports under CEQA/NEPA
- Preparation of baseline studies
- Assistance in public hearings and response to agency and public comments

Industrial Wastewater Discharge Permitting

- Influent and effluent characterization
- Preparation of Storm Water Pollution Prevention Permits
- Determination of appropriate control technology and best management practices (BMPs)
- Design and implementation of discharge monitoring programs

Regulatory Compliance

Clean Air Act Compliance

- Compliance audits under Title V, NSPS, MACT, and local regulatory programs
- Emission inventory development and preparation of required emission reports
- Expert witness and litigation support, including federal, state, and local enforcement actions and administrative proceedings

Hazardous Materials & Waste

- Waste characterization and management
- Design and implementation of waste management programs
- Hazardous waste training
- Preparation of Business Plans and Emergency Response Plans
- Preparation and certification of SPCC Plans

Environmental Auditing and Management

- Development and audit of corporate environmental and regulatory management policies
- Development and audit of corporate compliance programs

CERCLA/EPCRA Reporting

- Form R reports
- Emergency and spill reporting
- Pollution prevention reporting
- CERCLA 104(e) information request assistance

Customized Training

- Design and implementation of customized training for all media and programs
- Integration of customized training into our client's LMS

Technical Advocacy and Litigation Support

- Develop effective technical advocacy to support client, trade association and legal counsel advocacy programs at the federal, state and local level
- Provide expert technical assessments of the potential impacts of legislative and regulatory initiatives on client operations

Due Diligence

- Identification of environmental liabilities and opportunities associated with complex real estate transactions
- Technical advocacy
- Technical analyses to support Trade Assessment and Local Advocacy Program

Manufacturing Facility Environmental Compliance Program

Objective:

Management of a major manufacturing company with numerous facilities saw the need to design and implement an environmental compliance program at its manufacturing facilities nationwide. Until this point, corporate management had relied on local staff to ensure environmental compliance; however, this approach did not provide for proactive or comprehensive management of environmental issues.

Compliance was managed independently at over 50 separate facilities; this approach did not realize any economy of scale or best management practices. Our client challenged ALG to define a streamlined program that would realize compliance with environmental regulations, improved management systems, and overall cost savings.

Solution:

Working with senior management and operations, ALG selected a representative facility to:

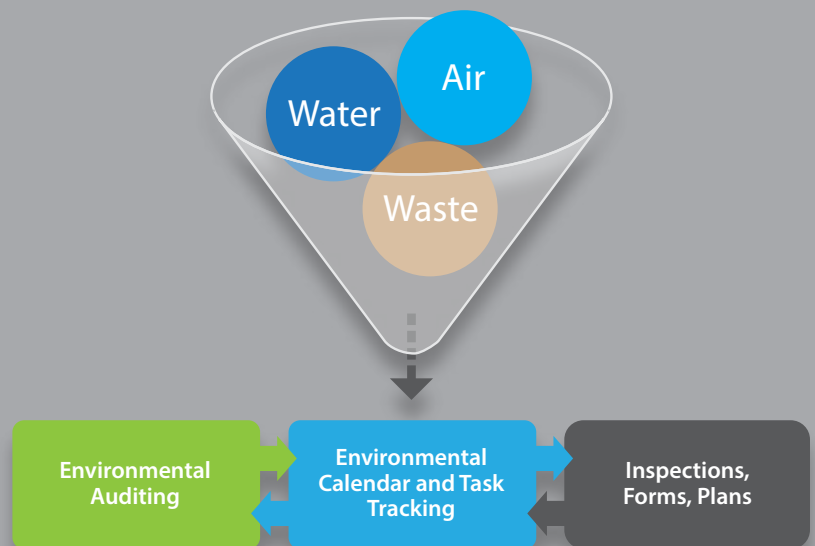
- Identify chemicals used in and releases from manufacturing and maintenance operations;
- Identify applicable requirements under federal, state, and local environmental regulations for all media (i.e., air, water, and waste); and

- Prepare an Environmental Management System (EMS) to identify and calendar all activities necessary and sufficient to ensure ongoing compliance with federal, state, and local rules and internal company policies. ALG then refined the EMS structure with input from corporate environmental and senior plant and management staff, creating a template structure that was used to prepare a customized EMS for each of the remaining facilities. ALG designed and conducted training sessions with corporate and facility staff to implement the measures identified in the EMS.

Result:

This approach allowed our client to:

- Enhance compliance at all facilities;
- Identify best management practices, and leverage these benefits among different operating groups;
- Streamline ongoing auditing, monitoring, recordkeeping, and reporting (both internally and under agency requirements);
- Significantly reduce total environmental expenditures; and
- Demonstrate and obtain agency recognition of an enhanced and professional environmental management program.



Airline, Oil and Gas, Logistics, Mining Operations, Refinery, and Commercial Clients

Mobile Source Impact Assessment and Reduction Programs

Objective:

Increasingly, industrial and commercial projects must quantify and mitigate emissions from off-road and on-road mobile equipment operations that are associated with the construction and operation of these facilities. Typically associated with CEQA/NEPA analyses and reports, these impact and offset studies are also occasioned by local air permitting and State Implementation Plan (SIP) control requirements. Accurate inventories and mitigation strategies rely on a solid understanding of the vehicle fleets, duty cycles, operating loads and other inputs. Absent careful and defensible analyses, projects may be subject to permitting delays, iterative analyses and costly mitigation programs.

Solution:

For over 20 years, ALG staff has worked with trade associations, legal counsel and our clients to help design and implement mobile source control programs that significantly reduce project impacts, and where alternate fuel options can support duty cycle requirements, realize significant savings for our clients. We have developed technology demonstration programs, retrofit programs, and integrated fleet management in support of aircraft, logistic, oil and gas, mining, refinery, and industrial operations. ALG staff has provided peer review for federal and state mobile source control programs including new engine standards and fleet retrofit programs. We have also worked with our clients to design and integrate alternate fuel technologies into their projects, which, when technically feasible, realize significant savings.

We have also developed more accurate off-road emission inventories in support of national and state SIP planning, which have been used to correct state and local agency planning inventories. Finally, our senior staff has provided expert witness testimony on diesel exhaust, including accurate emission inventories, incremental health impacts of diesel emissions, and assessments of technically feasible control technologies to mitigate the impacts of diesel emissions from on-road and off-road mobile and stationary engines.



Result:

Our understanding of accurate emissions data, duty cycles, and mitigation options allow ALG engineers to avoid conservative assumptions that often underlie these impact studies. Combined with extensive and practical experience in retrofitting and optimizing fleet operations, we can often mitigate mobile fleet modifications below significance thresholds. The project and our clients have also realized significant cost savings for those projects where alternate fuels meet duty/performance requirements

Semiconductor Manufacturing Company Emissions Control Program

Objective:

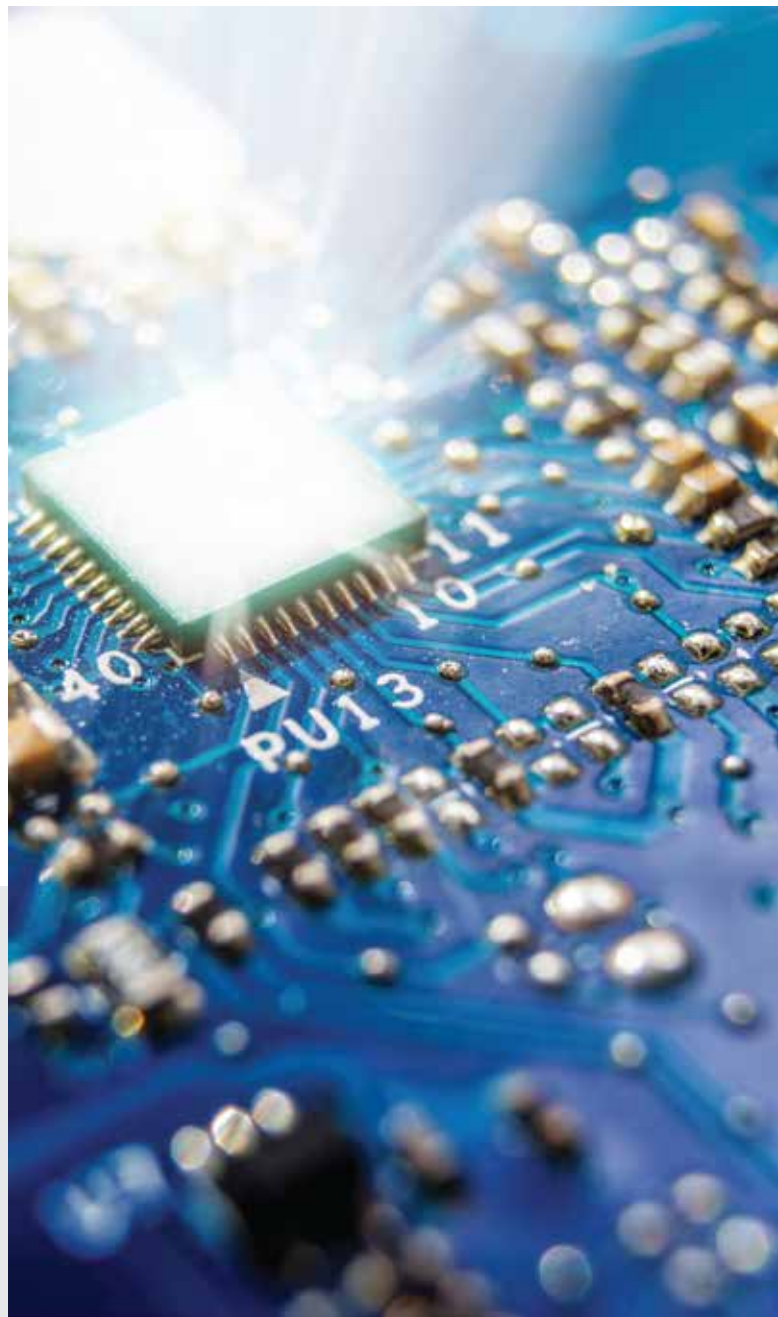
A large aerospace and electronics manufacturing company was required to reduce its emissions of volatile organic compounds (VOCs) from its semiconductor operations at five separate facilities; ALG staff was contracted to develop and implement a control program within a compressed schedule under an enforcement action brought by a local air pollution control agency.

Solution:

The initial engineering analysis revealed that traditional VOC control technologies (thermal, catalytic, and regenerative systems) and adsorption techniques were either ineffective or very expensive (upwards of \$100,000/ton of VOC controlled). ALG staff identified an innovative control technology – UV ozonation – and, together with the client and the local agency, implemented a technology demonstration program. The innovative technology was shown to achieve control requirements at a substantial reduction in overall control costs. Working with the client, ALG staff also identified process modifications and solvent substitutes for application at selected facilities.

Result:

The innovative control technology, coupled with process modifications, was successful in achieving a 90% reduction in VOC emissions at an estimated annual savings of \$3,000,000 to the client over the traditional VOC control technologies. Controls were installed within the schedule required by the local agency.



Manufacturing Facility EPCRA Reporting Enforcement Action

Objective:

A manufacturing facility and its legal counsel sought ALG staff assistance to resolve an Emergency Planning and Community Right-to-Know Act (EPCRA) Form R reporting enforcement action as quickly as possible with EPA and reduce total liabilities to the client.



Solution:

ALG staff conducted a site inspection at the manufacturing plant to review usage data and confirm potential releases of Form R chemicals. ALG also obtained specific formulation data to determine the exact constituency of material used at the plant. For those chemicals triggering Form R reporting requirements, ALG prepared Form R reports and documented the calculations used to prepare the reports. ALG staff also assisted legal counsel for the facility in resolving the enforcement action.

Result:

ALG identified errors in EPA's enforcement action that reduced the scope of potential fines by one-third. Furthermore, ALG staff worked closely with legal counsel for the facility to resolve the enforcement action, and reduced the final penalty by approximately 70%.

Plastic Extrusion Company Environmental Compliance Program

Objective:

A plastics manufacturing facility initially sought ALG's emission engineering and compliance assistance to prepare annual toxic release inventory information as required by the Emergency Planning and Community Right-to-Know Act (EPCRA). During the course of the project, ALG identified additional potential compliance issues relative to federal, state, and local air, water, and waste regulations.

Solution:

At the request of the client, ALG performed a complete environmental audit relative to applicable environmental requirements to determine any potential liabilities under federal and local air district regulations. The audit revealed several potential compliance issues, including the status of essential production equipment relative to local district air permitting requirements and prohibitory regulations.

Result:

Within 30 days of the audit, ALG gathered technical data, emissions data, and engineering analyses, prepared a detailed health risk assessment to confirm incremental cancer risks associated with carcinogenic emissions, and prepared all necessary applications required to comply with air quality control regulations, including air toxic health risk assessments and ambient air quality dispersion analyses.

Together with the client, ALG was successful in negotiating local agency permit approval within three weeks of application submittal. This permitting effort was completed within a compressed period, thus avoiding costly and lengthy administrative proceedings before the local district hearing board. It also demonstrated to federal agencies that the facility made good faith efforts to comply with all local permitting issues once they were identified.

ALG continued to work with client's staff, and has provided ongoing environmental support to ensure compliance of our client's operations with the Clean Air Act, EPCRA Form R reporting, Clean Water Act and the Resource Conservation and Recovery Act.

Oil and Gas Exploration and Production

Operating Permits

Objective:

The major oil and gas production and pipeline companies in Alaska sought to streamline the Title V permitting process that applied to their operations in the North Slope Borough and Valdez.

Solution:

ALG staff designed an operating permit application that significantly reduced the information requirements of the operators. Together with the clients' environmental staff, ALG successfully negotiated the use of the streamlined application forms with EPA Region X and the Alaska Department of Environmental Conservation.

Result:

The compliance assessments performed as part of this project identified those applicable requirements that were duplicative or had lapsed, thereby allowing operators to reduce recordkeeping, monitoring, and reporting requirements. In addition, ALG staff proposed ongoing compliance requirements under the terms of the Operating Permits that significantly reduced obligations on source operators from those suggested by agency staff.



Petroleum Refinery Expansion New Source Review

Objective:

A major petroleum refinery sought to increase production throughput of heavy crude, which required modifications to Permits to Operate issued for several of its process units.

Solution:

ALG designed a permitting strategy and control program to control emission increases associated with these modifications below new source review regulatory thresholds, thus avoiding a protracted permitting process.



Result:

ALG prepared the necessary permit applications and supporting materials, and succeeded in obtaining all approvals within 60 days – nine months prior to our client's scheduled completion date.

Legal Counsel Expert Witness Services

Objective:

Our clients' legal counsel require expertise to analyze scientific, engineering, and regulatory compliance issues associated with federal, state and local enforcement matters, as well as third party tort and real estate transfer matters. Examples include joint Department of Justice/U.S. Environmental Protection Agency (EPA) enforcement under the Clean Air Act over NSR/PSD and MACT standards; state/regional agency enforcement of wastewater discharge permits issued under the Clean Water Act; state and local agency enforcement of RCRA and EPCRA requirements applicable to industrial operations; and commercial transactions that warrant compliance with applicable federal, state and local environmental regulations.

Solution:

ALG senior staff have direct and seasoned experience in providing legal counsel with accurate and articulate technical analyses of the complex web of federal, state and local regulations as they apply to our clients' operations. Senior staff have been admitted as technical experts in federal and state courts and before hearing boards and administrative panels relative to State Implementation Plans, adequacy of prior BACT determinations, ambient and incremental health risk impacts associated with our clients' stationary and mobile operations, mobile source control requirements, and impacts of trading and transactions under cap-and-trade programs. In addition, senior staff have supported dozens of administrative proceedings for Orders of Abatement and variances under local air quality regulations. We also support legal counsel in detailed reviews of expert testimony by others.

Result:

Our technical analyses, which have included testimony in pre-trial depositions and at trial or before administrative boards, have supported successful defenses and settlement of major litigation. Our deep understanding of regulatory requirements and their application to our clients' industrial operations, coupled with staff's ability to provide focused and clear summaries of these technical issues, are cited by legal counsel as pivotal to their successful representation during these proceedings.

Logistics Company

Industrial Stormwater Discharge Permitting



Objective:

A large logistics company was required to update their Stormwater Pollution Prevention Plans at over 80 sites to comply with a new state Stormwater Industrial General Permit. Changes to the state permit included the addition of Numeric Action Levels and sampling events, additional mandatory sampling parameters, comprehensive

modifications to facility maps, amended SWPPP content and presentation, training requirements, and other modifications. Management determined that site visits would be required, and a comprehensive overhaul of the SWPPP program was necessary to meet these new requirements.

Solution:

ALG was selected to design and implement the new SWPPPs due to our expertise in stormwater management and our unique project management design that offered significant savings to our client. ALG coordinated site visits within a compressed schedule, outsourced costly tasks (i.e. computer mapping and document production), and leveraged our expertise with advanced document software that realized significant savings in the preparation of over 80 new SWPPPs. Our expertise in stormwater management allowed for streamlining Best Management Practices (BMPs)

and targeting these BMPs to address Total Metal and Total Suspended Solids Numeric Action Levels that are often problematic for commercial operations. To execute the mandatory training among hundreds of staff, we partnered with our client's LMS training division. ALG applied advanced LMS software to design and execute training that was customized to specific job classifications within our client's organization, and rolled out to all staff throughout our client's existing training system.

Result:

ALG's solid understanding of the new state general permit, combined with our unique project management and practical experience with BMPs, provided our client with an advanced SWPPP that was implemented at over 80 sites within a compressed schedule. Our client's environmental

management staff credited both our expertise and ability to partner with our client's internal support structure to provide a superior product and total integration into the existing Environmental Management System.

TSDF Facility NESHAP Permitting

Objective:

A Treatment, Storage, and Disposal Facility (TSDF) sought to expand its treatment capacity, and contracted with ALG staff to review permitting issues and to provide general strategic alternatives to permitting strategies. The facility sought to complete the proposed expansion within a compressed schedule.

Solution:

ALG reviewed the permitting strategy, and identified additional air permitting requirements under the EPA National Emission Standards for Hazardous Air Pollutants (NESHAPs) that applied to the proposed modification. ALG also identified additional environmental compliance requirements that applied to both the existing and proposed modifications.



Result:

Working together with corporate and facility staff, ALG developed the required compliance programs and permit applications. Together with the client, ALG met with EPA regional staff to review the permit application, and secured EPA permit approval within 3 months.

TSDF Facility Environmental Compliance Assistance

Objective:

ALG staff assisted a TSDF in compliance with the Resource Conservation and Recovery Act (RCRA) air emission standards (Subpart CC). EPA proposed to require TSDFs to comply with an entirely new regulatory compliance program to control air emissions from tanks, containers, surface impoundments and treatment units, including new air pollution control equipment, recordkeeping and reporting schemes.

Solution:

ALG staff recommended that our client approach EPA with an alternate compliance demonstration method: rather than craft a new compliance program, ALG demonstrated that compliance with existing NESHAP requirements satisfied the Subpart CC program.



Result:

Together with the client's legal counsel, ALG provided detailed comments to the EPA, resulting in the reopening of the rule and revision of the Subpart CC standards. By establishing this alternate compliance demonstration method, ALG substantially reduced the client's compliance costs and the complexity of ongoing compliance requirements.

Glass Manufacturing Plant

Environmental Permitting of Facility Expansion

Objective:

An existing glass manufacturing facility sought to expand its production capacity with the addition of a new glass furnace. The company had the option to construct this new capacity at one of several existing manufacturing facilities and did not wish to commit funds for detailed engineering design until all necessary environmental approvals were secured.

Solution:

Working with our client's legal counsel, ALG was retained to prepare a critical environmental permitting path analysis for its operation located in Southern California. Based on this analysis, ALG prepared applications for Permits to Construct the new units without detailed engineering design information, developed a detailed technical analysis to support the lead agency's review of the project under the California Environmental Quality Act, and assisted in securing all other environmental approvals. Technical analyses included emissions inventories of the facility and related operations for both toxic and criteria pollutants, required air quality impact studies that demonstrated compliance with restrictive local impact thresholds, health risk assessments, and Best Available Control Technology (BACT) analysis.

Result:

This approach allowed the company to expedite the permitting of the expanded facility without having to commit the capital required to complete the design of the new units in advance of securing necessary environmental permits.

Subsequently, ALG developed a site-specific air quality management program, which clearly defined all applicable requirements, specified the appropriate monitoring, recordkeeping and reporting provisions, and streamlined compliance functions. This analysis and management tool reduced staging requirements, achieved significant cost savings due to improved control technology performance, and improved compliance.



Petroleum Refinery Title V Compliance Program

Objective:

ALG was contracted by a major West Coast refinery to prepare and execute its Title V Compliance Program.

Solution:

Working with the refinery's legal counsel, environmental and engineering staff, ALG designed a phased program to:

- Identify all applicable requirements under the federal and state air pollution control laws and regulations;
- Audit the facility to assure compliance with these obligations;
- Define and execute a remedial plan to correct any deficiencies noted during the audit; and
- Prepare the permit application.

During the project, it became clear that the Title V application forms required by the local air agency would be unduly burdensome when applied to the facility. ALG therefore negotiated a streamlined application form for use by the refinery, thereby substantially reducing the level of effort required to develop the application. Through negotiations with agency staff, ALG also used the Title V permitting process to greatly reduce ongoing recordkeeping, monitoring and reporting requirements that would otherwise apply to the refinery.

Result:

Through these negotiations and additional permit hygiene measures, ALG reduced the potential enforcement exposure to the refinery. The final permit application reflected the maximum operational flexibility allowed under the Federal Title V program and local permitting regulations.

Subsequently, ALG, a Microsoft Partner, developed a customized Title V compliance relational database, which allows refinery staff to track compliance with all applicable monitoring, recordkeeping and reporting requirements specified in the Title V operating permit. This cost-effective database significantly streamlines ongoing complexity and cost of Annual Compliance Certifications, Semi-Annual Monitoring Reports, and Deviation reporting mandated under the EPA and local operating permit requirements. It has also proven to increase the understanding and access of refinery staff to operating permit conditions and requirements, which translates directly into improved performance.



National Retail Chain

Integrated Hazardous Material Business Plan and Waste Management Program

Objective:

A national retail company with over 400 retail centers across 40 states needed to design and implement a coordinated hazardous material/hazardous waste management program for their U.S. operations.

Solution:

ALG was selected to design and implement the new program based on our expertise in regulatory compliance, EMS design and training within the retail environment, and ability to partner with our client's technical, management and legal staff. ALG evaluated SKUs to identify hazardous properties and the potential for hazardous waste stream issues and prepared a focused needs assessment to identify varying state and local requirements. The team then designed a program to comply with the broad array of federal, state and local regulations, which was adapted to the client's existing management systems for inventory, sales, and related data, including a focused training program. Following beta testing to assure smooth integration with the client's varied operations, the program was refined to minimize impact and maximize efficiency. The complete plan, including training, was then rolled out company-wide. Follow-up audits were performed to identify any potential gaps in systems or training, and final adjustments were made to the program.

Result:

ALG's solid understanding of the array of hazardous material/hazardous waste regulations and practical experience in managing these requirements in the retail environment, combined with unique project management, allowed for full deployment of this integrated program within one year. Our client's environmental and management staff credited both our expertise and ability to partner with our client's internal support structure to provide a superior product and total integration into the existing management systems. This realized significant savings, and allowed for completion within the compressed schedule initially defined by senior management.

Public Utility

Air Quality Compliance Assistance

Objective:

Counsel for a public utility retained ALG to provide air quality permitting and compliance assistance relative to EPA PSD and local air district permitting issues.

Solution:

Working with legal counsel and the client's technical staff, ALG provided technical analyses of the federal and local air permitting and new source review requirements as they applied to modifications made to the generating station. ALG subsequently performed engineering and air quality studies (modeling and ambient sampling) that allowed the generating station to continue to operate until retrofit pollution controls could be installed.



Result:

ALG assisted legal counsel in negotiations with both EPA and Department of Justice to resolve federal Prevention of Significant Deterioration compliance issues, such that no PSD permit was required of the source. ALG also participated in negotiations with state and local air agency personnel to resolve local air permitting issues, and secured the necessary Permits to Construct and Operating Permits for the facility.

About Ashworth Leininger Group



Ashworth Leininger Group (ALG) is an environmental management consulting firm located in the Los Angeles, California area, with satellite offices located in the San Francisco Bay area and Colorado.

For more than 20 years, ALG has assisted clients in securing local, state, and federal air permits; addressing complex air quality compliance issues; conducting environmental audits; preparing periodic air quality emissions and toxic release inventory reports; assessing facility impacts on local and regional air quality; and assisting with the design and implementation of stormwater, hazardous waste, and hazardous materials management programs.

For more information on ALG's capabilities and staff, visit our website at www.algcorp.com.



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