



Optim Environmental Resources, Inc.

Professional Qualifications

April 2005



Optim Environmental Resources, Inc.

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CORPORATE DATA

State of Incorporation Ohio
Subchapter S Corporation
October 31, 1995

D-U-N-S Number 95-922-5111
TIN 31-1447921

CONTACTS

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Vice President Fax: (513) 326-7847
Email: chris.meyer@optim2000.com

OUR MISSION

Optim has a three-part mission that guides our business:

- Provide technically sound environmental service that optimizes our customers' business objectives and their environmental obligations
- Optimize the use of technology for maximum efficiency, superior service, and continued employee training and growth
- Create an open working environment that fosters self esteem and inner security for the team members

BUSINESS FOCUS

Optim staff specializes in providing air quality and permitting services to commercial clients. We provide services in the following areas:

Permitting:

- Air emissions inventories, criteria, HAPs, NSPS, Section 112(r)-RMP, NESHAP, Title VI ODS
- Construction permits and permits to install/operate air emission sources
- Title V operating permit assistance
- New Source Review (NSR) assistance including non-attainment NSR and Prevention of Significant Deterioration assistance
- Title V permit maintenance
- Compliance/emissions testing strategies and management
- Federally Enforceable State Operating Permits (FESOPs)
- Management of regulatory issues and liaison with regulatory agencies

Reporting:

- Fee emissions reports and emission statements
- Compliance Assurance Monitoring (CAM)
- Fee Emission Report / Annual Emission Statement (FER/AES)
- Annual Emission Inventory (AEI)
- Risk Management Plan (RMP)
-

Control Technology:

- Emissions control strategies
- Control technology selection
- Control technology evaluations and cost analysis
- RACT, BACT, and MACT studies
-

SARA TITLE III:

- Section 312 reporting
- Section 313 threshold evaluations
- Section 313 release and transfer estimation
- Section 313 Form R reporting

OUR APPROACH

Generating a project-specific approach that matches the objectives of the task is a key strength of Optim. For each project, we define the project objectives, products, and milestones with the help of our client. We develop a detailed workplan that provides a road map for the project upon agreement of these project elements. Our staff has the necessary expertise and training to develop work plans that meet our client's objectives.

Optim has developed the capabilities that are required to conduct projects in a cost-effective and timely manner. To complement the capabilities of our staff, we have acquired tools and systems that allow our staff to work efficiently. Our other support and infrastructure allows our staff to focus on the project tasks and provides the needed project management foundation.

The primary elements of our project management system are:

- Qualified staff
- Support systems and infrastructure
- Project specific project management approach
- Continued training to stay current with the regulatory and technical developments

Optim staff has a collective experience of over 50 years in the environmental and project management fields. Our experience encompasses a large spectrum of technical and regulatory projects and wide range of industrial projects. Our staff has conducted project activities at client locations and is knowledgeable about our client culture and operating environment.

We have established the necessary infrastructure that allows us to conduct the routine project management activities in an efficient manner. The infrastructure allows our staff to track project progress, costs, and deadlines to ensure that the projects proceed as planned. We also have a project confidentiality system in place that allows us to protect the proprietary information provided to us by our clients.

We use a project management approach that addresses the specific objectives of the individual projects. A workplan for an individual project allows us to conduct the project activities in a timely and cost-efficient manner.

Continued employee training to stay abreast of regulatory and technical developments is mandatory for the long-term survival and success of our organization. We allocate significant resources for accessing the regulatory information and continued training of our employees.

INFRASTRUCTURE

- Professional Liability Insurance
- General Liability Insurance
- Computer Systems
- Confidentiality agreements and procedures
- Employee benefits program

ACCOMPLISHMENTS

In a short span of time Optim has assisted several clients in resolving various environmental issues. Our select project accomplishments are listed below. Descriptions of the projects conducted by Optim staff are provided in the attachment.

- For Thermoseal Corporation's Sidney, Ohio facility Optim provided technical support in resolving complex permitting issues with the Ohio EPA and the local district office. The issues related to capture and control efficiency methods for several VOC emitting sources. Optim staff interfaced with the facility environmental staff and Thermoseal's legal staff in resolving the issues that were outstanding for over 5 years. Thermoseal has been informed by the regulatory agency that the approach proposed by the company is technically sound and has a valid regulatory basis. The agency is in the process of issuing a permit accepting Thermoseal's position.
- For Southdown, Inc., Optim reviewed a Title V application for the Fairborn, Ohio facility. Optim's in-depth review revealed several regulatory applicability issues that needed addressing. Optim also identified Starship issues that required changes to meet the regulatory guidelines. The review was completed in a very tight time frame to meet the application submission deadline.
- For The Procter & Gamble Company's Albany, Georgia Plant, Optim prepared a Prevention of Significant Deterioration (PSD) application for papermaking and boiler capacity expansion. The project assistance included dealings with the Georgia regulatory agency in negotiating permit terms and conditions and NSPS issues for the boiler. Optim proposed an alternative NOx monitoring plan that obviated a need for installation of continuous NOx monitoring system. The application was prepared in a record time frame that resulted in significant cost benefits to P&G.

OUR PLEDGE

Optim takes great pride in meeting the challenges of the individual projects. We constantly keep our clients' goals and objectives in sight and align our conduct with these goals and objectives. We pledge that:

- We will fully understand the goals and objectives of individual projects and develop an approach that is consistent with these goals and objectives
- We will be highly flexible in accommodating changes in project direction and changes that are necessary to enhance the project objectives
- We will stay current of the regulatory developments and will provide technically superior service
- We will optimize the use of technological tools to generate products that are compatible with our clients' system
- We will promote adequate interaction between project participants to enhance the quality of the project products
- We will take total responsibility for schedule and budget for every project

REFERENCES

New Source Review, Title V, and General Air Permitting Assistance, Emission Inventory Development and Annual Emission Reporting, and Air Permit Reporting and Compliance Support for Landfills and Support Facilities in Indiana, Kentucky, and Ohio
Rumpke Waste Removal, Inc., Cincinnati, Ohio
Contact: Mr. Jay Roberts
Phone: (513) 851-0122
email: jay.roberts@rumpke.com

PSD and Non-Attainment Area New Source Review Air Permitting
Procter & Gamble Manufacturing Company, Oxnard, CA
Contact: Mr. Peter Dawson
Phone: (513) 634-4566
email: dawson.pj@pg.com

PSD New Source Review Permitting Assistance, Emission Inventory Development and Annual Emission Reporting, and Air Dispersion Modeling
Ford Motor Company - Cleveland Casting Plant, Brook Park, OH
Contact: Mr. Kurt Braun
Phone: (313) 248-6750
email: kbraun@ford.com

PSD New Source Review, Title V, and General Air Permitting Assistance
Procter & Gamble Company, Albany, Georgia
Contact: Mr. Dan Brewer
Phone: (229) 430-8119
email: brewer.dr@pg.com

New Source Review Air Permitting Assistance for Peaking Stations in Indiana, Kentucky, Michigan, Ohio, and West Virginia
DPL Energy, Inc./BHE Environmental, Inc., Cincinnati, OH
Contact: Mr. Eric Riekert
Phone: (513) 326-1500
email: eriekert@bheenv.com

Combustion Sources PSD New Source Review Air Permitting Assistance
General Mills, Cincinnati, OH
Contact: Ms. Michele Smith
Phone: (513) 612-5518
email: smith052@mail.genmills.com

PSD New Source Review and General Air Permitting Assistance
Procter & Gamble Manufacturing Company, Jackson, TN
Contact: Mr. Jim Chezem
Phone: (513) 634-4940
email: chezem.je@pg.com

Title V and General Air Permitting Assistance, Emission Inventory
Development and Annual Emission Reporting, and Air Permit Compliance
Support

Thermoseal Inc., Sidney, Ohio

Contact: Mr. Robert J. Leighty

Phone: (937) 498-2222

email: bleighty@thermosealinc.com

Title V and General Air Permitting Assistance, Emission Inventory
Development and Annual Emission Reporting, and Air Permit Compliance
Support

Grote Industries, LLC, Madison, IN

Contact: Mr. Jim Plum

Phone: (812) 265-8878

email: jim.plum@grote.com

Synthetic Minor Air Permitting Assistance

Procter & Gamble Manufacturing Company, Modesto, CA

Contact: Mr. Peter Dawson

Phone: (513) 634-4566

email: dawson.pj@pg.com

Synthetic Minor Air Permitting Assistance

Pitney Bowes Inc., Miamisburg, OH

Contact: Mr. Todd Craig

Phone: (937) 847-5310

email: craigwi@pb.com

Synthetic Minor and Combustion Source Air Permitting Assistance

Safety-Kleen, Waynoka, OK

Contact: Mr. Brian Correa

Phone: (580) 697-3520

email: bcorrea@safety-kleen.com

Combustion Sources Air Permitting Assistance for Universities and
Hospitals

Fosdick & Hilmer, Cincinnati, OH

Contact: Mr. Bob Miller

Phone: (513) 241-5640

email: rmiller@fosdickandhilmer.com

COLLABORATIONS

Optim has successfully teamed up on projects with several environmental and engineering companies and law firms. We have built long-term ongoing relationships with the following companies.

BHE Environmental, Inc.
11733 Chesterdale Road, Cincinnati, Ohio 45246
Contact: John Bruck
Phone: (513) 326-1500
Email: jbruck@bheenv.com
Peaking Station Air Permit Assistance to DPL Energy LLC and General Air Permit and Other Technical Assistance to Various Clients

IT Corporation
11499 Chester Road, Cincinnati, Ohio 45246
Contact: Mr. Dan Perrin
Phone: (513) 782-4700
email: Dperrin@ITCRP.com
EPCRA/SARA Title III Assistance to Naval Bases in Virginia

The Payne Firm, Inc.
11231 Cornell Park Drive, Cincinnati, Ohio 45242
Contact: Mr. Antonio I. Domanico
Phone: (513) 489-2255
email: aid@paynefirm.com
Air Permit, Toxic Analysis, and Ambient Impact Analysis Assistance for Various Industrial Clients

Graydon, Head & Ritchey
511 Walnut, Cincinnati, Ohio 45202
Contact: A. Christian Worrell III
Phone: (513) 729-2701
email: worc@graydon.com
Air Permit and EPCRA Assistance for Industrial Clients

Fosdick & Hilmer, Inc.
36 East Fourth Street, Cincinnati, Ohio 45202
Contact: James W. Pretz
Phone: (513) 242-5640
email: jpretz@fosdickandhilmer.com
NSR and General Permitting Assistance for Kent State University, Cincinnati Children's Hospital Medical Center, Miami University, Village of Glendale, and Northern Kentucky University

Taft, Stettinius and Hollister
1800 Star Bank Center, 425 Walnut Street, Cincinnati, Ohio 45202-3957
Contact: Kim K. Burke
Phone: (513) 357-9369
email: kburke@taftlaw.com

Air Permit Enforcement Assistance for an Industrial Facility

Coolidge, Wall, Womsley & Lombard
33 W. First Street, Suite 600, Dayton, Ohio 45402
Contact: Timothy D. Hoffman
Phone: (937) 223-8177
email: hoffman@coollaw.com

Air Permit Enforcement and Litigation Assistance to Several Industrial
Clients

**APPENDIX A:
STAFF RESUMES**



Yatendra M. Shah, P.E.
Project Manager/President

Education

M.S., Mechanical Engineering

B.S., Mechanical Engineering

M.B.A.

Registered Professional Engineer, Ohio, Indiana, Kentucky, Michigan

Qualifications and Experience

Mr. Shah's qualifications include Clean Air Act regulatory analysis, federal and state air quality permits, ambient impact review, control technology analysis, permit compliance tools, and Emergency Planning and Community Right-to-Know (EPCRA) Title III compliance.

Mr. Shah has over 30 years of experience in the environmental field. He has managed a large spectrum of air quality projects for industrial and commercial clients. The process and source types analyzed by Mr. Shah include boilers and other combustion sources, papermaking operations, snack processing operations, painting and coating operations, municipal solid waste landfills, hazardous waste landfills, coke ovens, and foundry operations.

Mr. Shah's technical expertise and project management skills have resulted in expeditious issuance of air permits and resolution of compliance issues. He successfully managed five major New Source Review (NSR), Prevention of Significant Deterioration (PSD) projects for The Procter & Gamble Company that were critical to the product introduction schedule and competitive position of the company. Mr. Shah recently managed a PSD project for the proposed expansion of Rumpke Sanitary Landfill's Hamilton County, Ohio landfill. The project involved analysis of several pollutants and including complex ambient impact review analysis. For DPL Energy LLC, Mr. Shah managed a multi-site, multi-state electric peaking station air permit project that involved a very tight project schedule.

Mr. Shah has excellent rapport with the regulatory agency staff. On behalf of clients, Mr. Shah has worked in a cooperative manner with the regulatory agency staff in exploring innovative compliance solutions that provide maximum operational flexibility while maintaining the regulatory integrity. The recent examples include acceptance of new averaging time approach by the Ohio Environmental Protection Agency (OEPA) for air toxic constituents for Plas-Tanks Industries in Hamilton, Ohio, acceptance of the proposal for reclassification of the PSD baseline area by OEPA for Rumpke Sanitary Landfill, and implementation of parametric monitoring as an alternative to the installation of continuous emissions monitoring systems at The Procter & Gamble Company plants in Georgia and Missouri.

Updated

April 7, 2005

**Christopher J. Meyer**

Project Manager/Vice President

Education

B.S., Civil and Environmental Engineering

Qualifications and Experience

Mr. Meyer specializes in air emissions source characterization, Clean Air Act federal and state permitting, regulatory analysis, and compliance assessment. He has over 20 years of experience in the environmental field and has assisted over 130 clients in successfully managing environmental issues. His primary emphasis in providing environmental services has been on developing strategies that optimize the environmental obligations and business objectives of clients.

Mr. Meyer has broad technical experience in air quality engineering, including development and analysis of comprehensive criteria and hazardous air pollutant emission inventories; emission source characterization for dispersion modeling analyses; control technology evaluation (BAT, RACT, BACT, LAER, MACT) studies; preparation of complete state and federal (Title V, PSD) air permit application packages for existing, new and modified installations; and air regulatory review and analysis with respect to facility operations.

Mr. Meyer has extensive knowledge of environmental regulations and has assisted numerous industrial clients in discussions with regulatory agencies for resolution of a wide range of regulatory issues and enforcement actions. Mr. Meyer's project management skills have resulted in expeditious resolution of regulatory issues and timely issuance of permits by regulatory agencies. His involvement has resulted in significant reduction of proposed penalties or dismissal of the notices of violations. He also assisted clients in design and implementation of systems for proactively managing their environmental obligations.

Mr. Meyer has managed many air permitting, emission inventory, and reporting projects for industrial clients in many diverse areas such as iron and aluminum foundries, plastics production, petroleum refineries, foundry sand core and chemical production, rubber gasket and parts manufacturing, fertilizer production, ink pigment production, municipal solid waste landfills, hazardous waste landfills, plating operations, electric utilities, industrial machinery manufacturing, miscellaneous metal coating, wood furniture manufacturing, armored car production, personal body protection equipment manufacturing, cereal production, pet and snack food production, papermaking operations, soap manufacturing, printing and paper coating lines, and pharmaceutical manufacturing. He has also assisted various government agencies in air emission inventory and permit application activities including US Air Force and Navy bases, Fernald Feed Materials Production Center, Los Alamos National Laboratory, Savannah River Laboratory, Bluegrass Army Depot, and Newport Army Ammunition Plant.

UpdatedApril 7, 2005



LiAn Zhuang
Project Engineer

Education

M.S., Environmental Engineering
B.S., Environmental Science

Qualifications and Experience

Ms. Zhuang's qualifications include Clean Air Act (CAA) regulatory analysis, federal and state air quality permits, ambient impact review, permit compliance tools, and Emergency Planning and Community Right-to-Know (EPCRA) Title III compliance.

Ms. Zhuang has over 5 years of experience in the environmental field. She has assisted a wide range of industrial clients on their air quality projects. The process and source types include boilers and other combustion sources, papermaking operations, rotogravure printing process, painting and coating operations, municipal solid waste (MSW) landfills, rubber products, metal processing, and foundry operations.

Ms. Zhuang has accumulated extensive experience on the air quality analysis for boilers and other combustion sources. She assisted Children's Hospital Medical Center in obtaining the air permit-to-install (PTI) for their electric peaking generators and hot water boilers, as well as the facility-wide Title V operating permit application. She was heavily involved in the multi-state electric peaking station air permit and major New Source Review (NSR), Prevention of Significant Deterioration (PSD) projects for DPL Energy LLC. For the Procter & Gamble Paper Products Company in Georgia, she assisted in the PSD project and to obtain the Title V operating permit.

Ms. Zhuang's expertise on air emissions, air toxic release, and ambient impact review provides solid technical background for all types of air quality analysis. She has maintained herself up-to-date with the technical tools and software, including regulatory agency emission estimate tools and software, emission inventory management database programs, and ambient impact monitoring software.

Ms. Zhuang is technically knowledgeable on CAA New Source Performance Standards and maximum achievable control technology (MACT) standards. In a recent job for Rumpke Sanitary Landfill in Ohio, she has worked on a MACT standards review summarizing relative MACT standards that apply to MSW landfills.

Updated
April 7, 2005

**APPENDIX B:
SELECTED
PROJECTS**

**PSD Permitting Assistance to Procter & Gamble Paper Products Company
Albany, Georgia Plant**

**Project No. 5001-95-002; 5001-96-005; 5001-97-007; 5001-97-008;
5008-98-013; 5008-98-019; 5008-99-022; 5001-00-036;
5001-01-038; 5001-01-039; 5001-02-043; 5001-03-052
5001-04-055; 5001-04-056**

Project Contact: Mr. Dan R. Brewer

Optim prepared a PSD permit application for P&G's Albany, Georgia facility. The assistance allowed P&G to submit a completed application in a record timeframe resulting in significant potential cost benefits. The assistance related to a new papermachine and a new boiler and included estimation of emission rates, demonstration of best available control technology (BACT) for the project pollutants, completing Georgia forms, and interaction with the various P&G groups and with Georgia Environmental Protection Division. Various meetings with GaEPD were held to resolve permitting issues and to negotiate potential terms and conditions for the sources. Optim staff also coordinated the activities of a modeling contractor. Optim identified the state regulatory issues and federal NSPS requirements for the sources and outlined cost-effective options for complying with the applicable requirements. A plan for alternative NOx monitoring for the new boiler was prepared and accepted by GaEPD resulting in significant cost savings. Optim is responsible for preparation of quarterly emission progress reports for the new boiler, as well as review of air toxic impacts.

The project approach used by Optim allowed effective interaction between various P&G project groups, GaEPD, and consultants involved in the projects resulting in a permit that provided greatest flexibility to P&G.

**PSD Permitting Assistance to The Folger Coffee Company
New Orleans, Louisiana Plant**

Project No. 5001-04-059

Project Contact: Mr. Gary Busch

Optim is currently conducting various air emission estimating and regulatory compliance activities for the New Orleans Plant of the Folger Coffee Company. The assistance covers a broad spectrum of activities including emission estimates, dispersion modeling analysis, Best Available Control Technology (BACT) analysis, state and federal regulations review, emission test coordination, emission database development, and CAA Title V permit renewal assistance.

**PSD Permitting Assistance to The IAMS Company
Leipsic, Ohio Plant**

Project No. 5001-03-047; 5001-04-057; 5001-04-058

Project Contact: Ms. Jennifer Rower

Optim has conducted various air permit activities for the Leipsic Plant of the Iams Company and we are currently assisting the plant in securing air permits for the capacity expansion project at the plant. The assistance has include emission estimation activities, dispersion modeling activities, emission database activities, and stack test coordination activities. Optim prepared PTI applications for the capacity expansion project sources in a record time frame and is working closely

with the regulatory agencies and Iams staff in securing the required air permit in an expeditious manner.

Air Permit Activities for The Iams Company

Lewisburg, Ohio Plant

Project No. 5001-03-054-001

Henderson, North Carolina Plant

Project No. 5001-03-054-002

Aurora, Nebraska Plant

Project No. 5001-03-054-003

Project Contact: Mr. Todd Meyer

Optim has assisted the Iams plants in estimating combustion emissions and process VOC emissions from the pet food extrusion lines. Optim prepared the required air permit applications and worked with the regulatory agencies in incorporating these emissions in the facility air permits.

PSD and State Construction Permit Assistance to

Procter & Gamble Company

Jackson, Tennessee Plant

Project No. 5001-96-003; 5001-96-006; 5001-099-025;

5001-99-029; 5001-00-032; 5001-01-037

Project Contact: Mr. Jim Chezem

Optim prepared a PSD permit application for P&G's Jackson, Tennessee facility. The assistance allowed P&G to submit a completed application in a record timeframe resulting in significant potential cost benefits. The assistance related to new snack-making lines, increased boiler capacity and new inert gas generators and included estimation of emission rates, air dispersion modeling analyses, demonstration of best available control technology (BACT) for the project pollutants, completing Tennessee construction permit forms, and interaction with the various P&G groups and with Tennessee Air Pollution Control Division (TAPCD). In order to expedite the project schedule Optim staff assisted TAPCD in development of air emission inventories for other facilities for use in the air dispersion modeling analyses.

Various meetings with TAPCD were held to resolve permitting issues.

Optim previously assisted the facility in the preparation of state construction permit application for several other snack-making lines, boiler capacity increase and removal of operating schedule restrictions. The project approach used by Optim allowed effective interaction between various P&G project groups and TAPCD resulting in a permit that provided greatest flexibility to P&G.

PSD and Title V Permitting Assistance to Ford Motor Company

Aluminum Casting Plant

Project No. 5009-97-004 and 5009-97-004-001; 5009-99-009;

5001-01-013; 5009-04-019

Project Contact: Mr. Kurt Braun

Optim conducted all state air toxic and National Ambient Air Quality Standards (NAAQS) and Prevention of Significant Deterioration (PSD) increment dispersion

modeling analyses for the new aluminum casting plant located in Brook Park, Ohio. Optim was responsible for ambient air quality analyses for 4 separate sites in Ohio that were conducted simultaneously due to the tight project schedule constraints. Optim also was responsible for preparation of the Best Available Control Technology (BACT) demonstration report, which was completed within a 3 week time frame. The PSD permit application was approved by Ohio EPA and USEPA Region V within 4 months after submittal of the original application. The project required close interaction with the Ohio EPA Columbus, Ohio modeling and permit review staff.

Optim's knowledge of New Source Review (NSR) regulations, policies, and reference documents, such as the PM10 SIP Development Guidelines, allowed for siting of the new plant at the site preferred by Ford. The site is located in a PM-10 nonattainment area. Optim recommended the use of a 5 year arithmetic average to demonstrate compliance with the annual NAAQS, despite 2 years of exceedances resulting from unfavorable meteorological conditions. Optim was also able to demonstrate compliance with the annual NOx NAAQS by using actual operating conditions, as allowed in the USEPA reference Guideline on Air Quality Models, at the Ford Cleveland Casting Plant, resulting in lower modeled annual concentrations. Optim later was

able to use this information to assist Ford in conduction of dispersion modeling analyses for the expansion of the aluminum casting facility which confirmed that the ambient concentrations corresponding to the latest available data were below the National Ambient Air Quality Standards (NAAQS), Prevention of Significant Deterioration (PSD) increments, and the Ohio EPA allowable increments.

Title V Application Assistance for Ford Motor Company
Project No. 5003-95-001; 5003-95-002; 5009-98-007; 5009-01-011;
5009-01-012; 5009-01-013; 5009-02-015; 5009-03-016;
5009-03-017 through 5009-04-018

Project Contact: Mr. Kurt Braun

For the Cleveland Casting Plant, one of the largest foundries in North America, Optim prepared a Title V application. Optim's staff has assisted the Cleveland Casting Plant in air permitting and reporting activities over 8 years. The facility consists of over 175 sources and over 500 egress points. The effort represents one of the largest and most complex Title V sources in Ohio. Optim prepared comprehensive air emission inventories covering criteria and hazardous air pollutants, as well as SARA 313 toxic chemicals. Optim assessed regulatory applicability issues involving both state and federal regulations and operational flexibility scenarios. The Optim staff worked closely with the Ford personnel in ensuring that a Title V permit for the facility will be obtained that complies with the applicable regulatory requirements, while preserving the operational interests of the facility.

The project involved large amounts of data handling and processing and Optim staff have been instrumental in optimizing the use of computer databases and setting up systems that were compatible with systems in place at the Ford Motor Company. The project products were provided in electronic format to Ford for future use and integration into overall environmental databases maintained by Ford.

**Air Permitting Assistance to Thermoseal Corporation
Sidney, Ohio**

**Project No. 5005-95-001, 5005-97-006; 5005-98-011; 5005-99-020;
5005-00-027; 5005-01-031; 5005-02-037; 5005-03-041;
5005-04-046 through 5005-04-049**

Project Contact: Mr. J. Robert Leighty

The Optim staff has assisted the Thermoseal Sidney, Ohio facility with obtaining its air permits and use of alternative compliance methods since 1994. Thermoseal produces rubber gasket sheets through calendering operations, which are controlled by carbon adsorption units (CAUs). Thermoseal had not been able to demonstrate compliance with volatile organic compound (VOC) capture efficiency requirements using traditional USEPA test methods (i.e., Methods 18 and 25), and therefore, could not receive its air permits. Optim staff recommended the use of a liquid-liquid mass balance technique for demonstrating compliance after review of process operations and test methods indicated that the traditional test methods were not applicable. Optim staff researched the use of liquid-liquid mass balance techniques, as recommended by USEPA for sources controlled by CAUs in various New Source Performance Standards (NSPS) and federal implementation plans (FIPs). Optim staff were able to persuade the Ohio EPA that the liquid-liquid mass balance was most appropriate for the calendering operations, thereby breaking the impasse in the facility obtaining its air permits.

Air Permitting Assistance to Rumpke Waste Removal, Inc.

**Project No. 5008-96-001 through 003; 5008-97-004 through 011
5008-98-011 through 022; 5008-99-023 through 042
5008-00-043 through 070; 5008-01-071 through 101
5008-02-102 through 124; 5008-03-125 through 139
5008-04-140 through 153**

Contact: Mr. Jay Roberts

For the municipal solid waste landfills in Indiana, Kentucky, and Ohio, Optim conducted multitude of air compliance and permitting activities. The activities included review of NSPS Subpart WWW impacts and determination of compliance issues by facility. Emission estimates for non-methane organic compounds were computed using USEPA recommended procedures in computer models. The assistance also included emission inventories for criteria pollutants and HAPs and determination of regulatory compliance requirements.

Title V permit applications, fee emission reports, annual emission statements, and other permitting support was provided. Optim developed computerized databases for consistent estimation of emission data. Optim staff interacted with regulatory agencies in obtaining permit terms and conditions that afforded maximum operational flexibility to Rumpke sources.

Air Permitting Assistance for Torbeck Industries
Project No. 5002-95-001; 5002-98-002; 5002-01-006; 5002-02-012
5002-03-013; 5002-04-016; 5002-04-017

Project Contact: Mr. Larry Race

Optim has contracted with Torbeck Industries in Harrison, Ohio to provide general air compliance assistance. Optim staff have provided guidance to Torbeck Industries with respect to air permitting issues since 1994. Optim interacted with the Ohio EPA local air agency, the Hamilton county Department of Environmental Services, to allow for a more rapid processing of the certification for a permit to operate application. Optim discussed the issues with agency contacts and prepared a cover letter for submission with the certification to present the differences between how a coating line was actually installed versus its description in the PTI application. Optim was able to show the agency that the difference did not alter air emissions and, consequently, did not constitute a modification of the source.

Air Permitting Assistance for The Payne Firm, Inc.
Project No. 5003-99-007; 5003-02-008

Project Contact: Ms. Emily Rynders

Optim staff provided an air permit requirements memo for the Southern States Cooperative ground water and soil remediation project in Owensboro, Kentucky. This project involved three air emission sources: Full Scale Pump and Treat, Soil Vapor Extraction (SVE), and Oil-Water Separator. Optim staff conveyed recommendations for emission controls in the memo based on analyses results provided by The Payne Firm, Inc. Optim staff also provided general air permitting assistance.

Air Permitting Assistance for Safety Kleen/USPCI,
Lone and Grassy Mountain Facility
Project No. 5010-96-001; 5010-99-003

Project Contact: Ms. Jody Reinhart

Optim staff updated the air emissions inventory for the Lone and Grassy Mountain Facility to reflect the current operating status of the facility. Optim staff generated quantitative emission data that determined the air permitting course of action for the Lone Mountain Facility and generated emissions data in a format required for the appropriate permit application.

Air Permitting Assistance for COMCO/MarkAndy Inc.
Project No. 5020-01-003

Project Contact: Mr. Marty Cozzi

Optim staff prepared PTO Applications consisting of Emission Category Forms, process flow diagrams, compilation of MSDS and an EPA toxics review, for the 500kW Diesel Generator and Press Testing Operations for the COMCO/MarkAndy Inc. plant in Milford, Ohio.

Air Permitting Assistance for Grote Industries, LLC
Project No. 5020-98-001 through 003; 5024-99-001 through 006;
5024-00-007; 5024-01-008; 5024-01-009; 5024-02-010 through 012;
5024-03-013; 5024-03-014; 5024-04-015

Project Contact: Mr. James Plum

Optim annually reviews and updates the Grote Industries, LLC HAZMAT database which includes a review of MSDS and update of chemical properties for all substances, the inclusion of weight percentages for any chemical that is either a SARA 313 chemical or a CAA HAP, discussion with manufacturers for obtaining the most current MSDS, preparation of natural gas combustion SARA 313 chemical spreadsheets, and finally update of SARA 313 threshold evaluation spreadsheets to include processed/otherwise used/ manufactured usage of chemicals. Optim staff conducted a review of Title V and AES regulations and requirements for reporting of particulate matter (PM) and PM-10 and prepared a summary of the PM/PM-10 reporting requirements for Grote staff. This lead to preparation of check list for the RY 2002 annual compliance certification audit involving review of facility records and operations for compliance with Title V permit terms and conditions and review of paint booth monitoring records and various telecons with Grote staff on inspection deviations noted on paint booths and final preparation of the 2002 Title V permit annual compliance certification. Optim also has prepared the MACT Part 1 Application, SARA 313 threshold evaluation, and Annual Emission Statement Summaries for Grote.

Air Permitting Assistance for Amcast Industrial Corporation
Project No. 5025-01-002; 5025-02-003; 5025-02-004; 5025-02-005;
5025-03-006; 5025-04-007

Project Contact: Mr. Gary Lyman

Optim staff prepared a letter detailing potential HAP emission calculations and issues prior to a meeting between IDEM and Amcast staff to discuss the NOV. From this evolved the preparation of a comprehensive memo detailing errors in IDEM potential PM-10 emission calculations, presenting revised potential PM-10 emissions calculations and their basis, and presenting regulatory basis for Amcast position that facility was never a major PM-10 source under Title V. Optim conducted telecons and email with IDEM and Enviroplan staff regarding administrative amendment of FESOP to include additional paint guns; review of need for revision to potential VOC and HAP emissions for additional paint guns with Enviroplan staff. Optim has also reviewed IDEM instructions for Form PI-26 "S/H Process," made revisions to a draft permit application cover letter to include Pongborn shot blaster, reviewed and made revisions to draft construction permit application forms prepared by Amcast and reviewed Reverb # 1 stack testing and FESOP modification issues with Amcast staff.

Air Permitting Assistance for International Crankshaft Inc.
Project No. 5028-01-002; 5028-01-003; 5028-02-004; 5028-03-005;
5028-03-006; 5028-03-007; 5028-03-008; 5028-03-009; 5028-04-010;
5028-04-011

Project Contact: Mr. Eugie Mintu

Optim staff conducted a site visit to obtain Line 1 and Die Area production and operational data to prepare air construction permit applications. Then Optim staff reviewed historical Line 1, Die Area, and Mini-Inspection Area emission source permit and permit application data, reviewed and identified Line 1 and Line 2 Die Forging Process equipment differences in order to summarize the Line 2 Die Forging Process and Mini-Inspection Area modifications for inclusion in discussion with KDAQ regarding air permit applications for Line 1 Die Forging Press and Die Making Process and modifications to Line 2 Die Forging Process and Mini-Inspection Area. Optim then prepared the Kentucky permit application forms for Line 1 die forging process and die making process, spreadsheets summarizing emission calculations for Line 1 die forging process and die making process, process flow diagrams for Line 1 die forging process and die making process, spreadsheets summarizing emission calculations for Line 2 Billet Pre-heater, mini-inspection area shot blasters. Optim staff was also in charge of the preparation and update of RY 2000 threshold evaluation, which included spreadsheets for processed, other-wise used, and manufactured chemicals, preparation of environmental releases spreadsheets to estimate releases of lead, manganese & nickel; calculations included releases to air (stack/fugitive), stormwater releases, releases to Georgetown POTW, transfers to off-site locations, review of exemptions for on-site reuse materials from threshold evaluation for chromium, and preparation of RY 2000 Form R's for lead, manganese and nickel. Optim also conducted a site visit to review facility records associated with the Line # 2 operations in order to prepare the semi-annual reports and annual certification reports.

Optim also reviewed ICI's production data bases (MS Access 97 & 2000), from October 2000 to March 2002, for determination of compliance with permit limits including review of daily production records of parts processed, operating hours for each shift, and calculation of average hourly production data and monthly production data as required in the Line # 2 permit.

Air Permitting Assistance for Mullins Rubber Products, Inc.
Project No. 5032-02-001 through 005; 5032-03-006 through 008;
5032-04-009

Project Contact: Mr. William R. Mullins, Jr.

Optim assisted in the preparation of Mullins Rubber Products, Inc. Title V Permit Application. Optim conducted an extensive review of production data provided by Mullins on K001, rubber grinding operations, presses and milling operations, and of capacity/operations/emissions data and then classified emission units at the facility into non-insignificant, insignificant, and trivial sources. Optim staff prepared spreadsheets that summarized potential emissions from all insignificant sources that were classified as de minimis and prepared a spreadsheet that summarized all permitting options/permit strategy for the K001 paint booth.

The follow-up activities included review of the draft Title V permit, preparation of a response letter summarizing comments on the draft permit, review of the final Title V permit and preparation of document summarizing the monitoring, record-keeping and reporting requirements, preparation of quarterly reports, and preparation and review of RY 2002 Title V annual compliance certification.

Air Permitting Assistance for Children's Hospital Medical Center
Project No. 5033-02-001 through 004;
5033-03-005 through 007; 5033-04-008; 5033-04-009
Project Contact: Mr. Thomas E. Kinman, P. E.

Optim staff is responsible for CHMC's Title V permit preparation, preparation of quarterly, semiannual and annual reports, Fee Emission Reporting, emission calculations and permit forms for Hotwater Boilers and Sterilizer PTIs, review of federal regulations for reporting deadlines for refrigerating equipment and refrigeration equipment inventory data activities. Optim staff is currently dealing with backup boilers permitting issues.

Air Permitting Assistance for DPL Energy, Inc.
Project No. 5034-02-001; 5034-02-002; 5034-02-003
Project Contact: Mr. Mike Ispen

Optim's scope of work encompassed the preparation of Greenville, Darby and Montpelier Electric Generating Stations' RY 2001 Fee Emission Reports. Compilation of all the reports included the applicable calculating of 2001 emissions for all units, identifying those units with the potential to emit greater than 10 lbs per day of a criteria pollutant and/or actual emissions greater than 1 ton per year, and completion of the appropriate emissions reporting forms and statements.

Air Permitting Assistance for GRK Manufacturing Company
Project No. 5035-03-001
Project Contact: Mr. Eric Roeseler

For GRK Manufacturing Company, a music furniture manufacturing facility in Ohio, Optim staff prepared FESOP and PTI applications. This required a review of coating and thinners ingredients including possible photochemical agents, review of possible applicable regulations, and the preparation of permit forms and emission calculation spreadsheets.

Air Permitting Assistance for Parsons Infrastructure
And Technology Group Inc.
Project No. 5036-04-001
Project Contact: Mr. Byron Reynolds

Optim assisted the Parsons Infrastructure and Technology Group in preparing an air permit application for the Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP) facility at the Blue Grass Army Depot (BGAD) in Richmond, Kentucky. The application was submitted to the Kentucky Department of Environmental Protection, Division for Air Quality (KDAQ). Optim analyzed the various process streams and identified emission units at the facility. Detailed emission calculations were conducted and the facility's major source status was reviewed for determining

the scope of the air permit application. Optim completed the required application forms and a supporting technical document that documented the process descriptions and pollutant-specific emissions.

Boiler MACT Compliance Strategy Assistance for Ohio University

Project No. 5037-04-001

Project Contact: Mr. Ted Fares

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for industrial, commercial, and institutional boilers and process heaters (Boiler MACT) became effective on November 12, 2004 (40 CFR Part 63, Subpart DDDDD). Optim prepared a Boiler MACT compliance strategy report for the three coal fired boiler at the Ohio University campus in Athens, Ohio. The study conducted an assessment of in-place control measures current coal compositions for compliance with the Boiler MACT emission limits. The study provided a detailed evaluation of Boiler MACT provisions as applicable to the University boilers. The study provided specific recommendations for compliance with the Boiler MACT rule by the applicable compliance deadline.

**APPENDIX C:
INSURANCE
CERTIFICATES**

STATE OF OHIO

BUREAU OF WORKERS' COMPENSATION

COLUMBUS, OHIO 43215-2256

CERTIFICATE OF PREMIUM PAYMENT

This certifies that the employer listed below has paid into the State Insurance Fund as required by law. Therefore, the employer is entitled to the rights and benefits of the fund for the period specified. For more information call 1-800-OHIOBWC.

THIS CERTIFICATE MUST BE CONSPICUOUSLY POSTED.

POLICY NO. AND EMPLOYER

PERIOD SPECIFIED BELOW

1180446

01/01/2005 THRU 08/31/2005

OPTIM ENVIRONMENTAL RESOURCES INC.
8 TRIANGLE PARK DRIVE SUITE 801
CINCINNATI OH 45246

James Conrad
ADMINISTRATOR

www.ohiobwc.com

THIS CERTIFICATE MAY BE REPRODUCED AS NEEDED

OHIO BUREAU OF WORKERS' COMPENSATION

REQUIRED POSTING

Effective October 13, 2004, Section 4123.54 of the Ohio Revised Code requires notice of rebuttable presumption. Rebuttable presumption means that an employee may dispute or prove untrue the presumption (or belief) that alcohol or a controlled substance not prescribed by the employee's physician is the proximate cause (main reason) of the work-related injury.

The burden of proof is on the employee to prove that the presence of alcohol or a controlled substance was not the proximate cause of the work-related injury. An employee who tests positive or refuses to submit to chemical testing may be disqualified for compensation and benefits under the Workers' Compensation Act.

THIS LANGUAGE MUST BE POSTED WITH THE CERTIFICATE OF COVERAGE



RENEWED BUSINESS ACCOUNT PACKAGE POLICY

SPECIAL FORM

Policy Number	Named Insured and Address	From	Policy Period	To
1042959683	OPTIM ENVIRONMENTAL RESOURCES INC 8 TRIANGLE PARK DR STE 801 CINCINNATI, OH 45246	11/29/2004		11/29/2005

Agency Number	Agency Address	Coverage Provided By
048870530	SCHIFF KREIDLER-SHELL INC 1 WEST FOURTH ST, STE 1300 CINCINNATI, OH 45202	Continental Casualty Company CNA Plaza Chicago, Illinois 60685

This policy becomes effective and expires at 12:01 A.M. standard time at your mailing address on the dates shown above.

The Named Insured is a Corporation.

Your policy is composed of this Declarations, with the attached Common Policy Conditions, Coverage Forms, and Endorsements, if any. The Policy Forms and Endorsement Schedule shows all forms applicable to this policy at the time of policy issuance.

The Policy Premium is	\$740.00
Total Policy Charges	\$740.00
Terrorism Risk Insurance Act Premium	\$3.00

For your locations in the states of IL, LA, NJ, NY and OK Terrorism Endorsement G-144225-A and Terrorism Policyholder Notice G-144233-B applies: in all other states & DC, Terrorism Endorsement G-144234-B applies

In return for the payment of the premium, and subject to all the terms and conditions contained herein, we agree to provide the insurance as stated.

This section summarizes the included limits and coverages on your policy.

<u>BUSINESS LIABILITY</u>	<u>Limits of Insurance</u>
Liability and Medical Expenses	\$1,000,000
Medical Expenses (Per Person)	\$10,000
Fire Legal Liability (Any One Fire or Explosion)	\$100,000
Products/Completed Operations Aggregate	\$2,000,000
General Aggregate (Other Than Products/Completed Operations)	\$2,000,000
Hired and Non-Owned Auto Liability (Each Occurrence)	1,000,000
Hired Auto Physical Damage Coverage Deductible: \$250	\$50,000
Stop Gap Liability Designated States: OH	
Bodily Injury by Accident - Each Accident	\$1,000,000
Bodily Injury by Disease - Each Employee	\$1,000,000
Bodily Injury by Disease - Aggregate	\$2,000,000



Policy Number	Named Insured and Address	From	Policy Period	To
1042959683	OPTIM ENVIRONMENTAL RESOURCES INC 8 TRIANGLE PARK DR STE 801 CINCINNATI, OH 45246	11/29/2004	11/29/2005	

UMBRELLA COVERAGE

Limits of Insurance

Each Incident	\$1,000,000
Aggregate	\$1,000,000

Retained Limit \$10,000

Umbrella Coverage does not apply to Hired Auto Physical Damage Coverage

SCHEDULE OF UNDERLYING INSURANCE

Business Liability:

Refer to Business Liability Limits previously listed in this Declarations
(Excluding Medical Expenses, Fire Legal Liability, and Employee Benefits Liability)
(Excluding Medical Expenses and Fire Legal Liability)

Employers Liability:

Limits of Insurance:

Automobile Liability:

Limits of Insurance

Combined Bodily Injury and Property Damage Limit - Each Accident	\$1,000,000
Policy Number	, Issued by
EFFECTIVE	EXPIRING

PROPERTY AND MISCELLANEOUS COVERAGES

Limits of Insurance

Policy Deductible* \$250
*Refer to Deductible Provisions in the Special
Property Coverage Form for Deductible Exceptions.

Property In Transit	\$15,000
Employee Dishonesty	\$10,000
Money & Securities - Outside	\$5,000
Forgery And Alteration Coverage	\$10,000
Property Temporarily Off Premises	\$15,000

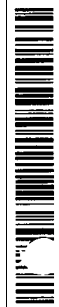
Location 1

8 TRIANGLE PARK DRIVE STE 801
CINCINNATI, OH 452460000

Joisted Masonry
Engineering Consultant-No Const-(Excl. Prof.) - 65121Q

Limits of Insurance

Total Premises Limit of Insurance	\$25,000
Business Personal Property	\$25,000
Valuable Papers	\$15,000



Policy Number	Named Insured and Address	From	Policy Period	To
1042959683	OPTIM ENVIRONMENTAL RESOURCES INC 8 TRIANGLE PARK DR STE 801 CINCINNATI, OH 45246	11/29/2004		11/29/2005

PROPERTY AND MISCELLANEOUS COVERAGES

<u>Location 1</u>	<u>Limits of Insurance</u>
Accounts Receivable	\$25,000
Money & Securities - Inside	\$10,000
Computer Equipment	\$25,000
Backup of Sewers and Drains	\$25,000



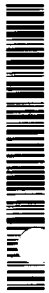
Policy Number	Named Insured and Address	From	Policy Period	To
1042959683	OPTIM ENVIRONMENTAL RESOURCES INC 8 TRIANGLE PARK DR STE 801 CINCINNATI, OH 45246	11/29/2004		11/29/2005

***** LOSS PAYEE SCHEDULE *****

All loss payees as their interests may appear in the Covered Property.

The following provisions are applicable: Loss Payable.

Description of Property: Any Covered Property in which a loss payee holds an interest.



Policy Number	Named Insured and Address	From	Policy Period	To
1042959683	OPTIM ENVIRONMENTAL RESOURCES INC 8 TRIANGLE PARK DR STE 801 CINCINNATI, OH 45246	11/29/2004	11/29/2005	

*** BUSINESS ACCOUNT PACKAGE POLICY FORMS AND ENDORSEMENTS ***

Form Number		Form Title
BP0158	04/00	Ohio Changes
BP1203	06/89	Loss Payable Provisions
G110719B	10/99	Stop Gap Liability Coverage Endorsement
G110730B34	09/01	Hired Auto and Non-Owned Auto Liability Endt
G123134B	12/02	Exclusion - Construction Management E And O
G126534A	10/97	Employment-Related Practices Exclusion
G127664A	11/97	Amendment - Agg. Limits of Insurance (Per Project)
G134800A	05/99	Exclusion - Asbestos
G140356A	02/01	COMPUTER VIRUS AND SYSTEM PENETRATION EXCLUSION
G140366A34	05/01	OHIO - Amendatory Stop Gap Liability Endorsement
G140412A	02/02	Known or Continuing Injury / Damage (Liability)
G140419A	11/01	MOLD EXCLUSION - LIABILITY
G140421A	11/01	MOLD EXCLUSION - UMBRELLA
G140423A	12/01	MOLD EXCLUSION - PROPERTY
G142591A	02/02	Known or Continuing Injury / Damage (Umbrella)
G142604A	02/02	Property Damage Definition, Amendatory Endorsement
G144234B	06/03	Terrorism Risk Insurance Act Endorsement
G144291A	03/03	Economic And Trade Sanctions Condition
G145032A	05/03	War Liability Exclusion
G147159A	03/04	BAPP Silica Exclusion
G19340F	01/00	BAPP Businessowners Special Property Coverage Form
G20506C	01/97	Umbrella Coverage Endorsement
G20510C	01/97	BAPP Businessowners Liability Coverage Form
G20866A	04/94	BAPP Businessowners Common Policy Conditions
G21289A	06/94	Hired Auto Physical Damage Coverage Endorsement
G56366B	08/89	Participating Provision
IL0244	07/02	Ohio Changes - Cancellation and Nonrenewal

*** PLEASE READ THE ENCLOSED IMPORTANT NOTICES CONCERNING YOUR POLICY ***

Form Number		Form Title
G129916A	01/98	Important Information For BAPP Policyholders
G134844A	09/99	Noncontractors Blanket Additional Insured Endt
G136061A	07/99	Important Information
G145041A	05/03	IMP INF Economic And Trade Sanctions Condition

*Note: For Renewal Policies Only
The asterisk following the edition date denotes new forms and endorsements which apply to this renewal, or which replace earlier editions of forms and endorsements on the original policy



Irvin H. H.
Chairman of the Board

Timothy N. Tegan
Countersignature

Jonathan Kauton
Secretary

ENVIRONMENTAL ENGINEERS AND CONSULTANTS
PROGRAM



**POLICY
DECLARATIONS**

AGENCY BRANCH	PREFIX	POLICY NUMBER	INSURANCE IS PROVIDED BY
056124	969	EEA 13-333-22-02	CONTINENTAL CASUALTY COMPANY, CNA PLAZA, CHICAGO, IL 60685, A STOCK INSURANCE COMPANY, HEREIN CALLED WE, US, OR OUR.

NOTICE

**THIS IS A CLAIMS-MADE POLICY. PLEASE READ THIS POLICY CAREFULLY AND
DISCUSS THE COVERAGE WITH YOUR INSURANCE AGENT OR BROKER.**

1. NAMED INSURED:

OPTIM ENVIRONMENTAL RESOURCES,
INC.

2. ADDRESS:

Suite 801
8 Triangle Park Drive
Cincinnati, Ohio 45246-3404

3. **POLICY TERM:** From: 12/20/2004 To: 12/20/2005 AT 12:01 a.m.
Standard time at **your** address shown above.

4. KNOWLEDGE DATE: 12/20/95

5. DEDUCTIBLE:

a. \$ 5,000 Purchased Deductible
b. \$ N/A Deductible Credit
c. \$ 5,000 is Deductible per **claim** (including **claim expenses**)
d. \$ N/A is Aggregate Deductible per **policy year**
(including **claim expenses**)

6. LIMIT OF LIABILITY:

a. \$ 1,000,000 Per **claim** limit of liability (including **claim expenses**)
b. \$ 1,000,000 Aggregate limit of liability per **policy year**
(including **claim expenses**)

7. INCEPTION DATE: 12/20/95 is the date of the first policy issued to
you and continuously renewed by us.

138811


Authorized Representative

G-136512-A17
(ED. 07/03)

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