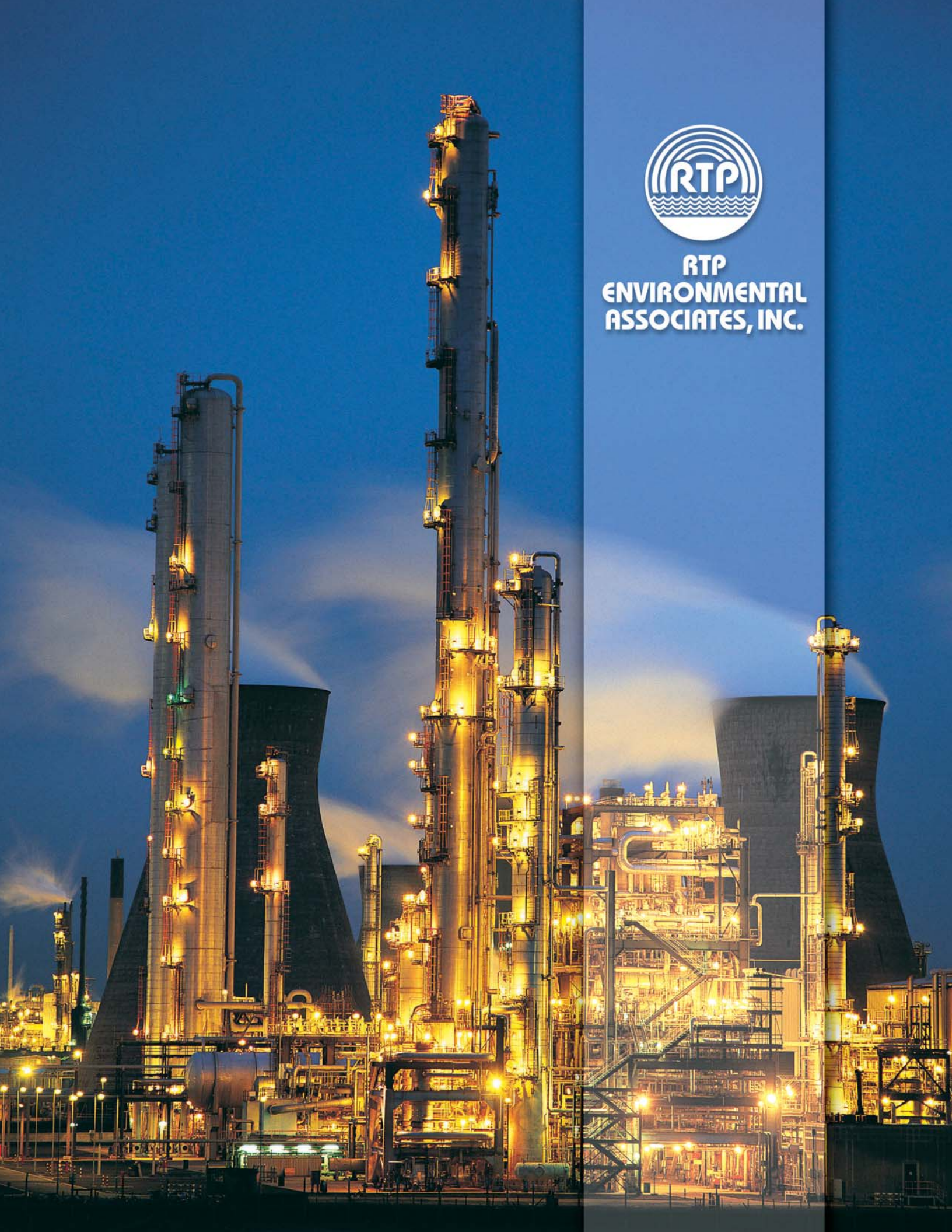
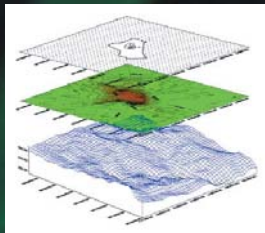




**RTP
ENVIRONMENTAL
ASSOCIATES, INC.**





RTP CAN EFFECTIVELY IDENTIFY AND RESOLVE YOUR ENVIRONMENTAL ISSUES

RTP Environmental Associates, Inc. (RTP) is a full-service environmental consulting firm with a highly experienced technical staff of engineers, chemists, meteorologists, computer scientists and information specialists. Founded in 1978, our years of experience provide us with excellent knowledge of the complex technical and regulatory issues involved in environmental permitting activities. We respond quickly to immediate needs, as well as provide long-range comprehensive planning services for both large and small scale projects.

Each regional office is headed by a principal with over 20 years experience in their respective disciplines. Several principals are nationally recognized experts. Our leadership is reflected in our training activities with major clients and state agencies, as well as books and training manuals authored by RTP staff.

With offices located throughout the United States, RTP is uniquely positioned to effectively assist industry and government with the identification, analysis, and control of environmental issues. We provide consulting services in air, water and solid waste disciplines.

RTP CONSULTING SERVICES ARE CONCENTRATED IN THESE MAJOR AREAS

- Air Quality Permitting and Regulatory Assistance
- Meteorology and Dispersion Modeling
- Air Quality and Meteorological Monitoring
- Air Pollution Control System Services
- Enforcement and Litigation Support
- Training and Information Sciences
- Source Sampling and Emission Control Technology Evaluations
- Solid and Hazardous Waste Management
- Water Quality Permitting and Regulatory Assistance
- Risk Management Planning Services
- Environmental Impact Statements and Assessment Services
- Environmental Site Assessment Services
- ISO 14001 Environmental Management System Services
- RCRA Compliance and Training Services
- Indoor Air Quality Services
- Asbestos and Lead Paint Services

RTP's philosophy is to provide our clients high quality, responsive and cost-effective consulting services. This document describes the services we offer in the areas outlined above. For more information or a description of additional services, please contact our nearest office.



★ **REGIONAL OFFICES**

Please visit our website at **www.rtpenv.com**



RTP has become synonymous with leading-edge air quality permitting services.

Our staff includes many of the top air quality professionals in the country, including nationally recognized experts involved in training government and industry permitting professionals. We have the experience and expertise to achieve project goals even under the most complex regulatory and permitting situations. Some of our core service areas include:

- Process analysis and emissions inventory
- Statutory/regulatory analysis and applicability determinations
- Strategic project planning to minimize compliance costs and other regulatory impacts
- NSR/PSD and minor source pre-construction permitting
- RACT, BACT, LAER, MACT and BART determinations
- Dispersion modeling and ambient air monitoring
- CAM development and compliance monitoring
- Title V and synthetic minor/conditional major operating permits
- Air toxics permitting and compliance

AIR QUALITY PERMITTING AND REGULATORY ASSISTANCE



ANALYSIS OF COMPLEX REGULATORY ISSUES

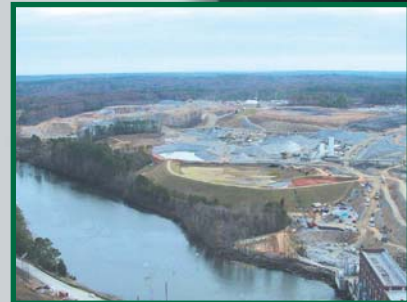
Our clients rely on RTP to provide them with a complete analysis and thorough understanding of Clean Air Act (CAA) regulations and applicability to specific situations. RTP has extensive experience with regulatory applicability determinations and the development/approval of alternative compliance and monitoring plans. This often relates to NSR and PSD, where RTP is widely recognized

as the leading authority, but that expertise extends to all areas of CAA compliance. Our veteran staff, which includes former EPA and State agency officials, recognizes the need to look beyond the words in the regulation to understand EPA and/or state policies and legal precedents. RTP maintains what is clearly the most comprehensive and usable non-governmental compilation of EPA air policy and guidance documents in existence, and we bring the knowledge contained in that compilation to bear in developing permitting strategies and negotiating with regulatory agencies.

PRE-CONSTRUCTION AND TITLE V PERMITTING

One of our core services is "routine" major and minor source permitting for clients throughout the U.S., representing all major industry sectors. RTP has an extensive track record of successful projects in all areas of pre-construction permitting, including major NSR/PSD permits, minor and synthetic minor permits, PSD netting-based permits, non-attainment area permits and offsets, and bubble or plant wide applicability limit (PAL) permits. We dedicate senior level staff who have the comprehensive knowledge and experience necessary to deliver permit applications and supporting technical analyses,

(continued)



AIR QUALITY PERMITTING AND REGULATORY ASSISTANCE (CONT.)



regulatory bases, and calculations for optimal results to each of our permitting projects.

RTP also has extensive experience in preparing Title V permit applications, modifications, and renewals. RTP compiled the Air & Waste Management Association (A&WMA) Title V guidance manual under subcontract to EPA and has conducted Title V training seminars for many governmental and industry clients. We have

assisted hundreds of industry clients in meeting Title V requirements, including Compliance Assurance Monitoring (CAM), in nearly every state. We can help you achieve full compliance with minimum burden and cost.



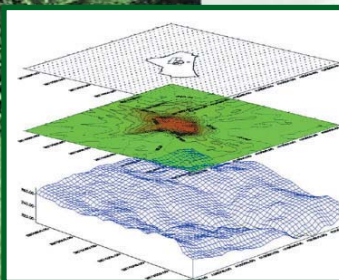
HISTORICAL NSR AND NSPS APPLICABILITY REVIEWS

RTP has assisted dozens of industry clients with comprehensive historical NSR/PSD and NSPS reviews, either in response to EPA enforcement action or in support of voluntary initiatives. Industry sectors represented include petroleum refining and petrochemical, pulp and paper, wood products, and electric utility generating stations. This work, frequently conducted collaboratively with legal counsel, has resulted in successful settlements with EPA and DOJ and/or State agencies, saving our clients millions of dollars.

METEOROLOGY AND DISPERSION MODELING

RTP has traditionally provided our clients with broad analytical services in meteorology and dispersion modeling.

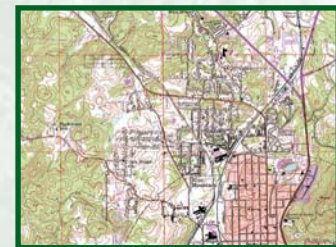
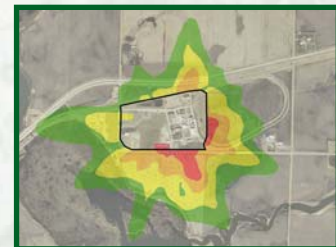
RTP has extensive experience in applying atmospheric dispersion models for permitting, EIS analyses, facility design, health risk assessments and other special purposes. Our modeling staff is adept at performing analyses that are accurate, cost-effective, and meeting even the toughest schedules. RTP can provide full contract services in these areas or be included as a specialty air modeling service contractor within a major project team.



RTP maintains a library of computer models and our staff has participated in the development and evaluation of the EPA's models including ISCPrime, AERMOD, and CALPUFF. We have written computer programs to derive site-specific receptor grids directly from USGS DEM data files, and developed digitizing techniques for terrain profiles for CTDMPLUS and CTDM Screen.

RTP was the first consultant to use EPA's AERMOD-PRIME model for PSD permitting and SIP compliance modeling of complex projects in sensitive areas in EPA Regions 8 and 9.

Modeling protocols and analyses prepared by RTP have addressed a variety of locations in rural and urban environments, ranging from simple single-point rural analyses to complex multi-source industrial applications in urban areas. Diverse source treatments have been developed including continuous and intermittent sources, surface fugitive areas and line source releases, volume release sources, and accidental release scenarios. RTP modeling protocols comprehensively address all the important aspects of a study and are typically approved by the regulatory agency upon first review.





We perform ambient monitoring for pollutants and meteorological parameters.

Our meteorological monitoring experience includes the installation and operation of remote, solar powered wind measurement systems, Doppler and monostatic acoustic radar systems, and multi-leveled tall towers. We can provide complete turnkey systems or lease equipment for the duration of a monitoring project.



RTP performs independent "third party" system and performance audits on existing monitoring systems as well as data reduction and processing services.

RTP also integrates high quality field data with local and regional meteorological and climatological conditions to specifically evaluate existing and proposed source interactions.



RTP can provide you with complete turnkey ambient monitoring systems for meteorology, criteria pollutants, metals, fluorides,

volatile and semi-volatile organics, toxic and hazardous pollutants as well as noise and odor. Our experienced staff offers full-service instrumentation, operation and calibration. RTP can supply visual and data telemetry, data management and equipment maintenance services. In addition, we can provide in-house analytical services for TSP, PM10, PM2.5, metals, fluorides, VOC, SVOC and HAPs.

MONITORING SYSTEM FEATURES AND MANAGEMENT SERVICES INCLUDE

- Design of monitoring systems
- Supervisory control and data acquisition
- Real-time process monitoring
- Real-time and historical trending
- Alarming and alarm management
- 100% data integrity
- Comprehensive, accurate reporting
- Statistical process control.

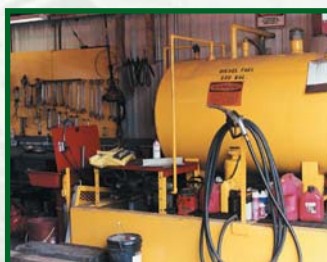


Increasingly stringent environmental regulations are requiring higher performance and greater reliability for new air pollution control (APC) systems.

Failure to comply can mean significant penalties for both owners and operators.

RTP PROVIDES

- Definition of emission characteristics, such as flow rate, temperature, pressure, and composition
- Identification of APC technology alternatives
- Technical and economic cost/benefit evaluations of alternatives with recommendations
- Preparation of process flow diagrams and piping & instrumentation diagrams



- RFP specifications
- Preparation of pre-construction air permit applications
- Development of monitoring, record keeping and reporting protocols and compliance systems
- Preparation of performance and compliance test protocols
- Supervision of performance test after start-up.

AIR QUALITY AND METEOROLOGICAL MONITORING

AIR POLLUTION CONTROL SYSTEM SERVICES

ENFORCEMENT AND LITIGATION SUPPORT

No company has been more involved in providing technical support to industry related to the EPA NSR enforcement initiatives.

RTP routinely provides expert services by means of testifying and consulting expertise to companies and law firms involved in enforcement actions. We also provide comprehensive environmental management and auditing services to address various challenges when enforcement issues arise.

OUR KEY SERVICES INCLUDE

- Multi-media compliance audits
- Regulatory compliance management systems and tools
- CAA Section 114 response
- Historical regulatory and permitting reviews
- Consent Agreement negotiations and settlement
- Voluntary disclosures
- Expert witness services
- Litigation technical support



Support services include the development of expert reports and testimony related to RACT, BACT, MACT and LAER emissions calculations and permitting procedures.

TRAINING AND INFORMATION SCIENCES

RTP recognizes that it can be more economical and efficient to perform certain tasks in-house.

RTP has served as principal faculty for USEPA courses offered by the Air Pollution Training Institute (APTI). Courses developed and presented by RTP include Intermediate Permitting (APTI 461), Effective Permit Writing (APTI 454), Basic and Advanced New Source Review (NSR) Training, Best Available Control Technology (BACT), and Risk Management Planning. We offer a wide variety of training courses, several of which are not available elsewhere.

Unique to RTP is an Advanced NSR course being offered publicly and privately. The course is like no other; it reviews all of the 500+ policy documents in a five volume, 3,000 page NSR Guidance Notebook. RTP also offers a comprehensive workshop on BACT.

RTP'S TRAINING COURSES ON FEDERAL AND STATE ENVIRONMENTAL LAWS AND REGULATIONS INCLUDE



- Basic, Intermediate, and Advanced New Source Review (NSR)
- Best Available Control Technology (BACT)
- Effective Permit Writing
- Basic New Source Performance Standards (NSPS)
- Basic National Emission Standards for Hazardous Air Pollutants (NESHAP)
- Negotiating Permit Conditions (NSR and Title V)
- Risk Management Planning (RMP)
- Internal auditing/training for Environmental Management Systems (EMS)
- HAZWOPER training
- Ambient air monitoring systems
- Continuous Emission Monitoring (CEM)
- RCRA, DOT and OSHA training

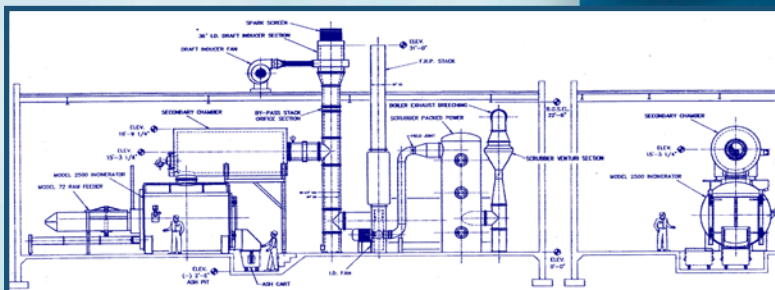


RTP has expertise in source sampling and Continuous Emission Monitoring (CEM) systems acquired through both research projects and field experience.

RTP designs, conducts, manages, and audits source sampling as well as provides specifications or reviews of CEM systems for a variety of sources.

In many cases we work with associate firms with specialized capabilities in source testing and CEM certifications.

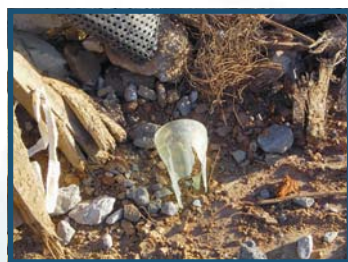
RTP scientists and engineers maintain the requisite skills to evaluate control options and prepare necessary documentation for conformance with Best Available Control Technology (BACT), Lowest Achievable Emission Rate (LAER), Compliance Assurance Monitoring (CAM), or State regulations.



SOURCE SAMPLING AND EMISSION CONTROL TECHNOLOGY EVALUATIONS

RTP is in the forefront of waste management from environmental and regulatory perspectives.

RTP provides environmental consulting and permitting services for the construction and operation of waste treatment storage and disposal facilities such as landfills, composting facilities, resource recovery projects and recycling efforts.

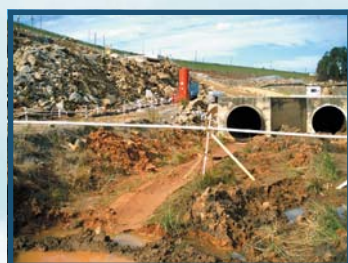


RTP also responds to NSPS and Emission Guideline requirements for landfills, municipal solid waste combustors, and other solid waste disposal facilities. We also provide technical and management support functions either as complete service contracts or special task assignments.

RTP'S SERVICES IN HAZARDOUS WASTE MANAGEMENT INCLUDE

- Assessment and monitoring of existing conditions
- Remediation plan development
- Remedial investigation and feasibility study (RI/FS) workplans
- Remediation alternatives leading to site closure plans

The collective experience of RTP's staff assures that problems will be evaluated completely from all perspectives. Diffusion studies can be integrated into risk assessment methodologies for determining the potential of acute and chronic exposure. The access to risk assessment specialists and extensive databases provides clients with accurate and rapid responses to specific project needs.



SOLID AND HAZARDOUS WASTE MANAGEMENT

WATER QUALITY PERMITTING AND REGULATORY ASSISTANCE



RTP provides comprehensive services to successfully assist clients in preparing and obtaining environmental permits and plans required under the Clean Water Act.

Typical permits include NPDES wastewater discharge permits, individual NPDES stormwater permits, multi-sector general permits, stormwater permits, and Section 404 Wetlands Permits. We also prepare Spill Prevention, Control, and Countermeasure (SPCC) Plans, Facility Response Plans (FRP), and Stormwater Pollution Prevention Plans (SWPPPs).

RTP CONDUCTS THE NECESSARY SUPPORTING ANALYSES FOR

- Quantification and characterization of wastewater and stormwater
- Applicability determinations
- Wastewater treatment performance analysis
- Vulnerability and hazard analysis
- Preparation and implementation of stormwater management programs



RISK MANAGEMENT PLANNING SERVICES

Under the General Duty Clause, all users of hazardous chemicals are required to plan for accidents.

RTP has extensive experience evaluating the three basic elements of an RMP (Risk Management Plan): Hazard Assessment, Prevention Program, and Emergency Response Program. We provide:

- Evaluation of potential ranges of releases for a facility, including worst-case accidental releases
- Analysis of potential off-site consequences
- Process hazard analyses
- Determination of program level and compliance documentation



RTP works with on-site and corporate staff to take maximum advantage of the experience and resources already available in your company.

USEPA guidance for an off-site consequence analysis is very conservative. RTP is keenly aware of the potential dangers and liabilities associated with an RMP that shows potential for extreme off-site consequence. Our experience with independent computer modeling can significantly limit over-estimating dangers and liabilities. RTP can also work with your public relations group to prepare community information materials and to set up and participate in public meetings as part of the RMP process.



RTP provides both managerial and technical assistance in scoping, negotiation, preparation, and defense of an Environmental Impact Statement (EIS).

Since permit applications are based on the same information for most environmental disciplines, RTP can integrate these efforts to ensure maximum efficiency and consistency.



RTP has managed the preparation of Federal EIS/EA documents and State equivalent programs throughout the United States. RTP has worked with the U.S. Department of the Interior, U.S. Bureau of Land Management, Bureau of Indian Affairs and state planning and permitting agencies. Our experience has ranged from the fast track approach through defensible documentation for litigation purposes. Our efforts have withstood legal challenges. EIS/EA efforts include capital projects in excess of four billion dollars.



ENVIRONMENTAL IMPACT STATEMENTS AND ASSESSMENT SERVICES

The purpose of a phased site assessment is to review past and present land use practices, site operations, site conditions, and to evaluate the potential for areas of environmental and regulatory concern.



Site assessments include evaluations of the potential for soil, surface water, groundwater, and air quality contamination resulting from past and/or present operations and nearby off-site operations. The evaluation of the potential issues of concern relating to hazardous materials and wastes at a facility are often conducted in general accordance with the American Society for Testing and Materials (ASTM-1527) standards and in response to client-specific scopes of services.



Each assessment is performed in a phased approach, which begins with a preliminary physical site reconnaissance, including an evaluation of past and present land uses, commonly known as a Phase I Environmental Site Assessment. Potential environmental problems identified during this phase are further investigated to the extent required by applicable regulations as part of a Phase II assessment. Based on the investigative result, mitigation and/or remediation plans

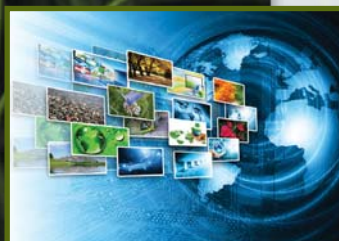
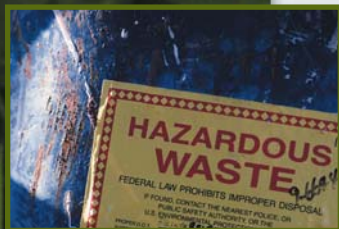
may be initiated. The initial stages of a site assessment are the most crucial. RTP works closely with its clients and when appropriate, the regulatory agencies, to define a timely, phased work plan based on the ASTM standards or other applicable criteria. That plan addresses potential problem areas while remaining focused on specific objectives, thereby limiting analyses and costs. RTP seeks to minimize potential risk within the budgetary limitations of each specific project.

Our staff has performed a large number of environmental site assessment projects. RTP's experience ranges from small vacant lot assessments to large scale assessments. We are available to assist you in preparing a site assessment that is responsive to your needs.

ENVIRONMENTAL SITE ASSESSMENT SERVICES



ISO 14001 ENVIRONMENTAL MANAGEMENT SYSTEM SERVICES



RTP excels in developing and assessing Environmental Management Systems (EMS) to conform with ISO 14001 standards.

RTP will work with different management and staff levels within an organization to develop a complete, flexible, efficient, and value-added EMS program. We can assist in planning and implementing a combined Responsible Care and ISO 14001 EMS program.

RTP provides technical assistance in the development, implementation, and maintenance of procedures and programs for the following elements of an EMS:

- EMS manual
- Identification of environmental aspects and significant impacts
- Operational control procedures, work instructions, and records
- Identification of legal requirements
- Environmental objectives and targets
- Training requirements
- Internal and external communications
- Emergency preparedness and response
- Monitoring and measurement
- Calibration, maintenance, and record keeping
- Procedures for relevant compliance requirements
- Identification and maintenance of records
- Corrective or preventive action procedures
- Internal audit plan



RTP can also provide your organization with the following ISO 14001 services:

- First party EMS audits
- Third party audits of an EMS
- Response to appropriate corrective actions and surveillance
- Gap analysis of existing systems
- Regulatory compliance audits
- Site-specific EMS training

RTP has staff members with international Registrar Accreditation Board EMS certification and experience as contract auditors with a major registrar.

RCRA AND OSHA COMPLIANCE AND TRAINING SERVICES

RTP provides comprehensive EPA and DOT compliance assistance and training for all hazardous waste generating facilities and businesses that ship and/or store hazardous materials or hazardous waste.

We work with clients to develop procedures that meet regulatory requirements, and we also provide required training pertaining to those processes. RTP has experience working with clients to meet DOT and International Air Transport Association (IATA) compliance requirements. We assist clients with DOT security assessments and in developing plans to manage risks identified in security assessments. RTP can audit your process for compliance and provide in-house training. Training can include both regulatory awareness as well as function-specific training.

RTP provides comprehensive RCRA and OSHA compliance assistance and training services.

We provide routine audits for our clients to determine OSHA compliance in all areas of OSHA applicability. This includes hazard communication, process safety management, hearing conservation, lock-out/tag-out, and permit-required confined space entry.

RTP provides tailored on-site training for many OSHA standards for worker protection.



RTP assists clients with indoor and ambient air quality assessments that define potential sources and mitigation options.

RTP will investigate complaint histories, recent facility changes, HVAC evaluations as well as conduct sampling to quickly assess and efficiently identify problem areas and sources. RTP provides comprehensive reports of observations, analytical results and remediation recommendations.

RTP field technicians employ OSHA/ASTM sampling techniques to assess the presence of organic compounds, gaseous emissions, particulate matter, asbestos, lead, mold, bacteria and to determine odor and noise exposure levels. Air microbial samples are collected using impactors and specially prepared petri plates.

RTP performs HVAC inspection, evaluation and planning to provide necessary information to determine the adequacy of an HVAC system. RTP also ascertains the general state of repair and cleanliness and prophylactic protocols for protection against bioterrorist attacks.

RTP assists with both planning and management of the Indoor Air Quality (IAQ) environment by:

- Developing an IAQ profile
- Addressing existing and potential problems
- Educating building personnel
- Developing a plan for operations and maintenance
- Identifying processes with potentially significant pollutant sources
- Communicating with occupants about maintaining good IAQ
- Establishing procedures for responding to IAQ complaints

RTP provides comprehensive asbestos and lead paint services to our clients.

These services include conducting building assessments, developing removal specifications, and monitoring removals for public, commercial, and industrial facilities. In addition, we are fully accredited under the Asbestos Hazardous Emergency Response Act (AHERA). Our staff has consulted on more than one thousand asbestos-related projects. The types of asbestos and lead services that RTP provides include:



SURVEYS AND INVESTIGATIONS

- Walkthrough — limited and general surveys
- Building architectural design review
- Pre-demolition surveys
- Air monitoring and exposure assessment
- Sampling plan and sampling
- AHERA surveys



ABATEMENT SERVICES

- Design of abatement plans and specifications
- Abatement project monitoring
- Project oversight



OPERATION AND MAINTENANCE PROGRAMS

- AHERA-style O&M plans for schools and public buildings
- Building-specific O&M plans tailored for commercial buildings

INDOOR AIR QUALITY SERVICES



ASBESTOS AND LEAD PAINT SERVICES



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