



STATEMENT OF QUALIFICATIONS

Aquionix
EHS Services
303-289-7520
www.aquionix.com

INTRODUCTION

Aquionix, Inc. (Aquionix) is a full-service environmental, health and safety consulting and field services company that provides client-focused solutions to meet compliance and regulatory obligations. Aquionix was founded in Denver, Colorado in 1998 and has grown to provide services throughout the United States. Our staff includes professionals who are trained and experienced in regulatory review, interpretation and applicability determination, air dispersion modeling and permitting, health and safety program development and implementation including training, and environmental plan development and sampling. Aquionix staff members have experience working on projects ranging in size from stormwater sampling at small industrial facilities to the development of EHS management systems at large hard rock mining facilities. Aquionix realizes that regulatory issues are often complicated, and our staff strives to provide an atmosphere of comfort and integrity to make our clients comfortable in their decisions.

MISSION

Our commitment to quality, integrity and customer service at Aquionix has gained the trust and respect of clients, peers and regulatory agencies throughout the United States. We take pride in our contribution to the national economy, our economic role and the creation of jobs in creating a prosperous and fulfilling work environment. We maintain and encourage an academically and professionally challenging environment that supports opportunities for personal development and improvement through a diversity of projects and educational betterment for our staff, and maintain and encourage a philosophy focusing on long-term employee and client relationships based on trust and respect.

PURPOSE

Aquionix provides exceptional consulting services to the public and private sector. We have some of the best and brightest scientists, engineers and safety professionals working with us to achieve your objectives. With hands-on experience in the manufacturing, oil and gas, mining, trucking, petrochemical, brewing, food services and medical industries, our trained professionals have the knowledge and insight to understand your issues and concerns, and the ability to utilize this knowledge to propose and implement practical and effective solutions. Working as a partner from the beginning to the end, we aim for lasting relationships with our clients through efficient and dependable performance. We are committed to solving problems and creating solutions that seamlessly integrate into our client's business, save time and resources, and that meet the demands of today's regulatory environment.

CLIENTS

Because our clients are our most important asset, our project managers are adept at identifying project objectives and excel at collaborating with clients and the regulatory community to provide innovative strategies and solutions to achieve our client's goals. Some of Aquionix' clients include:

- *Aggregate Industries*
- *Ardent Mills*
- *Barrick Gold Corporation*
- *Broomfield WW Reclamation Facility*
- *CCRP Operating LLC*
- *CoorsTek*
- *CSL Plasma*
- *Denver Sanitary*
- *EOG Resources*
- *Fiore and Sons*
- *Dry Dock Brewing Co.*
- *Freeport McMoRan Copper and Gold*
- *Frito-Lay*
- *GCC of America*
- *Herman Loeb*
- *King Soopers Bakery*
- *LaFargeHolcim*
- *Littleton Adventist Hospital*
- *Medved Autoplex*
- *Midas Gold*
- *MillerCoors*
- *Mission Foods*
- *Pavestone*
- *PetroShare Corp.*
- *Quikrete*
- *Rocky Mountain Bottle Company*
- *Sara Lee Bakery*
- *University of Colorado*
- *Upland Exploration*
- *Wapiti Energy*
- *Waste Management*
- *Western States Asphalt*
- *Ziegenfelder Co.*

ENVIRONMENTAL, HEALTH AND SAFETY SERVICES

Aquionix provides a range of services from regulatory evaluation and applicability determinations to development of compliance programs for air, waste, water and occupational safety to development and implementation of certifiable environmental, health and safety management systems. Aquionix has a deep understanding of environmental regulations and successfully advocates for our clients with regulators to facilitate permitting and efficient operations.

Air Compliance and Permitting

Aquionix offers a myriad of air compliance and permitting services, including dispersion modeling, emissions calculations, permitting and many other services. Our highly experienced personnel have an in depth understanding of the regulatory air obligations affecting industries such as oil and gas exploration and production, mining, and manufacturing. Aquionix has successfully advocated for our clients with regulators to facilitate permitting, negotiate permit conditions, and support operations and productivity. Aquionix can support clients with various compliance and permitting requirements such as:

- Greenhouse gas (GHG) calculations and reporting
- Annual emission inventory preparation and submittal
- Title V application preparation, submittal and permit compliance
- Emissions tracking database development
- NSR and PSD application preparation, submittal and permit compliance
- BACT/RACT analysis
- Facility registrations under state-specific programs
- Air emission sampling and dispersion modeling
- Development and implementation of maintenance plans for air pollution control equipment
- Colorado-specific APEN preparation and submittal
- Emission control technology selection
- Dust control plan development

Spill Prevention and Emergency Preparedness

Aquionix routinely develops and implements Spill Prevention, Control and Countermeasures (SPCC) Plans and Facility Response Plans (FRP). We also complete reporting under community-right-to-know regulations for companies in a variety of industries such as petrochemical, mining and oil and gas exploration and production. As part of spill prevention and emergency preparedness projects, we routinely assist clients with:

- Review and updating of SPCC Plans
- Review and updating of FRPs
- EPRCA/SARA Tier I and II reporting
- EPCRA Toxic Inventory Release (TRI) reporting
- Routine inspections
- Completion and administration of corrective action programs
- HMIS preparation
- TSCA Chemical Data Reporting (CDR)
- Emergency response drills and tabletop exercise completion and assessment
- Spill reporting and cleanup
- Emergency personnel and employee training
- AutoCAD and ArcGIS mapping for facility emergency preparedness
- Emergency Response Plan (ERP) development

Water Compliance and Permitting

Our staff members have developed and implemented hundreds of comprehensive water programs for private and municipal clients that require a thorough understanding and interpretation of applicable regulations. We have been tasked with performing applicability determinations for water compliance regulations for surface and ground water, have successfully developed compliance and management programs, and have been integral in client permit application, modification and termination processes. Our field services division has more than 25 years of sampling experience to support a variety of sampling requirements under Federal, state and local regulations. Specifically, Aquionix has assisted clients with:

- Wastewater discharge permitting
- Stormwater permit applications, modifications and terminations
- Stormwater Management Plan (SWMP) development
- Stormwater inspection and program review
- Stormwater sampling, monitoring and reporting
- Stormwater control/BMP installation and maintenance
- Groundwater permitting
- Industrial discharge monitoring
- Discharge monitoring reporting (DMR)
- Drinking water, groundwater, stormwater and wastewater sampling and monitoring
- Drinking water compliance program development and maintenance
- Drinking water and groundwater monitoring well installation and abandonment
- Water treatment system design, installation, operation and maintenance
- Regulatory mediation and fine negotiation

Health and Safety Programs

Aquionix has extensive experience developing and managing health and safety programs. We routinely assist clients ranging from local small businesses to international corporations with:

- Health and safety management system development, implementation and maintenance
- Policy and procedure development
- OSHA or MSHA internal auditing
- Employee training
- Risk assessment and hazard analysis
- Incident investigation and root-cause analysis
- Regulatory mediation and fine negotiation

Waste Compliance and Management Programs

Projects commonly managed by Aquionix' waste compliance and management professionals include those associated with industrial operations such as small paint shops to large facilities involving many waste streams throughout multiple states. As part of our variety of waste compliance and management experience, we routinely provide our clients with the following waste-related assistance:

- Profiling and characterization of waste streams
- Waste management program
- Contingency plan development and implementation
- Auditing of treatment, storage, disposal

- development and implementation
- Pollution prevention and recycling program development and implementation
- Regulatory mediation and fine negotiation
- and recycling facilities
- Biennial and state-specific annual reporting
- Waste sampling and characterization
- Employee waste (RCRA) and transportation (DOT) training

ENVIRONMENTAL, HEALTH AND SAFETY, AND QUALITY MANAGEMENT SYSTEMS

Aquionix provides sustainable and integrated solutions for the development of Environment and Health & Safety management systems that comply with internal and/or relevant national and international standards including ISO 9001, 14001 and 45001, as well as the OSHA Volunteer Protection Program (VPP).

Management systems are tailored to suit our client's business needs and to meet industry standards. Aquionix has developed both complete and components of management systems that have been certified to ISO 9001, 14001 and 45001 as well as the OSHA VPP. We also work with clients who are not looking for certification to a standard, but prefer a tailored system that works for them and their business reducing EH&S risks, maintaining compliance and ensuring sustainability in their process. Our staff also assists with the development of policies, procedure and guideline in support of a management system. In addition, we offer a software solution supporting implementation and communication of any management system.

Aquionix offers our clients innovative mapping solutions using either AutoCAD or ArcGIS software that clearly convey environmental compliance requirements and provide a basis for plan preparation, implementation and training exercises.

SUSTAINABILITY

Aquionix has experience in providing our clients with assistance in managing their social and environmental impacts. Clients have been able to achieve cost savings and regulatory compliance by utilizing the following services:

- Global Reporting Initiative Programs
- Greenhouse Gas (GHG) Assessment Programs
- International Council on Metals Mining (ICMM) Programs
- Product Life Cycle Assessments
- Biodiversity Management Programs
- Pollution prevention program development and implementation
- Recycling program development and implementation

TECHNOLOGY SOLUTIONS AND MAPPING

Aquionix can provide a range of technological solutions supporting data acquisition, management and reporting. Our staff of professionals can assist in the development of custom software solutions, as well as the development of Microsoft SharePoint applications for the management of internal compliance programs such as product approval, SDS storage, compliance task tracking, preventive maintenance and asset tracking. We can also help migrate existing data acquisition solutions to handheld technologies that improve the efficiency and integrity of inspections and data collection.

AutoCAD and ArcGIS Support

Aquionix offers our clients innovative mapping solutions using either AutoCAD or ArcGIS software that clearly convey compliance requirements and provide a basis for plan preparation, implementation and training exercises.

PERSONNEL QUALIFICATIONS

Our staff carry and maintain a multitude of qualifications to meet the needs of our clients. Every individual is encouraged to pursue certifications, degrees or licenses that will support client needs, but that will ultimately result in individual professional growth and development. Aquionix personnel maintain the following qualifications:

Asbestos

- State of Colorado Certified Building Inspector

Colorado Department of Transportation (CDOT)

- Colorado Department of Transportation (CDOT) Erosion Control Supervisor

Colorado Water System Operator of Responsible Charge (ORC)

- Colorado Small Wastewater System Certified Operator
- Colorado Small Water System Certified Operator

Hazardous Waste/Materials Management

- Certified Hazardous Materials Managers
- HAZWOPER 40-Hour

Management Systems

- ISO 9001 Quality Management Auditors
- ISO 14001 Environmental Management Auditors
- ISO 45001 Occupational Health and Safety Management Auditors

Mine Safety and Health (MSHA)

- 24-Hour Aboveground Certification
- 40-Hour Belowground Certification

Professional Licenses

- Professional Engineer (PE) Certifications for CO, AZ, GA, LA, MT, ND, NE, NJ, NM, NV, OH, OK, WY, SC, SD, TN, TX, UT, VA, WY

PROJECT EXAMPLES

Oil and Gas Exploration and Production

Services Provided

- Evaluated and prepared applicability determinations in regards to relevant regulations such as NSPS OOOOa and Fort Berthold Indian Reservation Federal Implementation Plan (FIP).
- Provided guidance to client on compliance/costing strategies as required under applicable regulations.
- Developed monitoring, recordkeeping and reporting compliance programs.
- Developed emissions tracking database and recordkeeping depository for permitted facilities.
- Performed facility inspections to assist operators maintain compliance with applicable regulations.
- Prepared and submitted NSR synthetic minor permit applications, GHG reports, and state-specific annual emission inventories.



Managed the air compliance and permitting program for oil and gas exploration and production operations in Montana and North Dakota, including operations occurring on tribal lands. The program involved tracking of production and associated emissions, preparing and submitting annual emission inventories and GHG reports, assisting with the development and implementation of a monitoring, recordkeeping and reporting program under EPA's jurisdiction on tribal lands and the performance of facility inspections to help the operators maintain compliance with various air requirements.

Developed an interactive air emissions database for tracking associated emissions on a 12-month rolling basis, which may also be used as a tool for forecasting permitting requirements.

Food and Beverage Corporate EHS Management Systems

Services Provided

- Provided training, information, and tools on management systems, particularly on the elements of the OSHA Voluntary Protection Program (VPP).
- Conducted health and safety management system and compliance audits nationwide.
- Worked closely with corporate and individual facilities to close gaps identified in management system and compliance audits.
- Acted as facilitators and strategic partners for the development and implementation of regulatory compliance and management system programs.



Aquionix provided behind-the-scene services to organize audit schedules and agendas for this client. Custom audit and reporting tools were developed based on specific requests from corporate and the different facilities. Aquionix provided assistance categorizing and prioritizing opportunities and gaps identified during audits and supported the client in determining suitable and sustainable close out measures as appropriate.

Wastewater Sampling and Compliance Support

Services Provided

- Evaluated wastewater permit conditions and developed a monitoring and sampling program to meet conditions.
- Acted as the liaison between the facility and regulatory body for permit negotiations.
- Generated sample summaries based on the required permit condition frequency detailing the wastewater discharge characteristics and laboratory analysis.



In conjunction with personnel at a beverage canning facility, Aquionix provided permitting support services from negotiation with the discharge permitting authority to periodic sampling services to scheduled report writing and submittal. The facility permit required quarterly compliance sampling for the purpose of maintaining compliance with their wastewater discharge permit, for which Aquionix performed using our automated sampling devices. Following each sampling event, Aquionix provided support to the facility in the form of negotiation and communication with the permitting authority. Based on the support we provided, the facility has maintained compliance and a healthy relationship with the permitting authority over the past several years.

Oil and Gas Stormwater Permit Support

Services Provided

- Prepared and supported the submittal of construction stormwater permit coverage for oil and gas production facilities under the Colorado Department of Public Health and Environment (CDPHE) Colorado Discharge Permit System (CDPS) General Permit, COR400000, Stormwater Discharges Associated with Construction Activity.
- Determined applicability of permit coverage to oil and gas production facilities based on status of reclamation.



CDPHE signed into authorization the new and revised General Permit for Stormwater Discharges Associated with Construction Activity, COR400000, on April 1, 2019. Permit coverage involved preparation of a Stormwater Management Plan and subsequent online submittal of a Notice of Intent (NOI) via the Colorado Environmental Online Services (CEOS) portal. Aquionix counseled the customer on appropriate stormwater management practices, prepared the Stormwater Management Plan to reflect operational practices, provided support to the customer with the setup of their CEOS account, prepared the online NOI and successfully helped the customer obtain permit coverage ahead of the start of construction of wells pad locations.

Oil and Gas Baseline Groundwater Sampling

Services Provided

- Provided permitting support in the identification of available water sources for sampling in accordance with state requirements.
- Acted as the primary point of contact for landowners.
- Drafted and obtained access agreements from landowners prior to sampling activities.
- Sampled water sources (i.e., seeps, groundwater wells etc.) for compliance with state requirements.



In accordance with state regulations, Aquionix supported oil and gas operators in the Denver-Julesburg Basin with a baseline groundwater sampling program. Aquionix was responsible for contacting and scheduling sampling from the residential homes identified as having groundwater sources within a ½ mile radius of a proposed oil and gas production well. Samples were collected following the established protocols and submitted to an accredited laboratory for analysis. For each well that was sampled, Aquionix prepared a sample summary that included information about the water source location, landowner comments and requested analytical.

Hard-Rock Mining SPCC Plan Development and Program Implementation

Services Provided

- Developed and certified SPCC Plan for open-pit and underground hard-rock mining operations.
- Provided ArcGIS mapping solutions for the facility to identify the locations of SPCC-related containers and secondary containment systems.
- Provided inspection support for quarterly inspections of SPCC-regulated containers.
- Developed *Ecesis*® module as a data repository for container management and inspection records.



Development of the SPCC Plan for this facility consisted of a week-long trip for the purposes of inventorying SPCC-regulated containers and gaining a very thorough understanding of the mining and milling processes to detail them in the Plan document. Aquionix staff utilized the *Ecesis*® SPCC module to build the container inventory and develop an inspection program for the facility moving forward. ArcGIS was utilized to clearly identify SPCC-regulated containers and areas, identify drainage patterns, and demarcate facility-specific structures to supplement the SPCC Plan.

The facility is currently operating under the SPCC Plan and performing inspections utilizing *Ecesis*® on a quarterly basis.

Mining Facility Stormwater Management Plan Development and Inspection Support

Services Provided

- Prepared facility-specific stormwater pollution prevention plan (SWPPP) in accordance with the Nevada General Permit, NVR300000, Stormwater Discharges Associated with Industrial Activity from Metal Mining Activities.
- Performed visual facility inspections required under general permit.
- Prepared and submitted Annual Stormwater Report required under general permit.



Project consisted of the evaluation of the facility applicability under the Nevada General Permit, NVR300000, *Stormwater Discharges Associated with Industrial Activity* from Metals Mining Activities. Aquionix personnel performed a reconnaissance visit at the facility to identify potential pollutant sources, outfall locations and associated BMPs in efforts to accurately capture current site conditions for discussion in the SWPPP, development of the stormwater inspection and monitoring program, and development of the site map.

In addition to developing the SWPPP, Aquionix supported the client in performing the required visual inspections on a quarterly basis. Aquionix also assisted in preparing and submitting the Annual Stormwater Report required by the general permit.

Oil and Gas Exploration and Production SPCC Plan Development and Implementation

Services Provided

- Developed and certified SPCC Plans for more than 230 oil and gas exploration and production facilities.
- Performed periodic inspections of facilities to ensure compliance with applicable requirements.
- Provided ArcGIS mapping solutions to identify the locations of SPCC-related containers and secondary containment systems at facilities.



Aquionix engineers and scientists developed an SPCC program for oil and gas exploration and production operations that encompassed the operations from more than 230 production facilities in multiple states. The development of the program involved the performance of an inspection of each facility and its associated SPCC-regulated containers, storage and secondary containment, utilization of ArcGIS to support individual facility diagrams, and development of an SPCC Plan in collaboration with operations that complied with the regulations.

Asphalt Terminal Facility Response Plan Development

Services Provided

- Developed and certified SPCC Plan for a bulk asphalt and emulsions facility.
- Evaluated worst-case discharge planning distances calculations for a catastrophic release from the facility's largest tank.
- Utilized Overland Flow model to predict discharge distances and volumes.
- Developed a Facility Response Plan based on the impacts from the Overland Flow model output.



In addition to the development of an SPCC Plan for this facility, Aquionix professionals identified the need to evaluate whether a discharge from the facility would cause injury to fish and wildlife sensitive environments. Using the Overland Flow model for asphalt oil spills, it was determined that this facility should prepare a Facility Response Plan (FRP) consistent with the requirements in 40 CFR Part 110.

Aquionix engineers prepared an FRP for the facility and assisted with the identification of an emergency response contractor in the area that could deploy the required amount of boom to protect identified fish and wildlife areas within the specified timeframe.

Industrial Facility Stormwater Management Plan Development and Sampling

Services Provided

- Performed visual, benchmark and water quality standards monitoring required under facility-specific Certification to Discharge in accordance with the Colorado General Permit, COR900000, Stormwater Discharges Associated with Non-Extractive Industrial Activity, for a glass bottle manufacturing facility in Denver, CO.
- Performed routine visual facility inspections required by the General Permit.
- Prepared and submitted quarterly DMRs in accordance with the reporting requirements in the General Permit.



Project consisted of collecting stormwater discharge samples during storm events on a quarterly basis for visual, benchmark and water quality standard compliance. In addition, Aquionix field staff performed the permit required quarterly visual inspection of potential pollutant sources and outfall locations at the facility. The results of the stormwater sampling efforts were compiled into the Discharge Monitoring Report (DMR) and provided to the client following completion of each quarterly event for submittal to the Colorado Department of Public Health and Environment (CDPHE) Water Quality Control Division (WQCD). The results of the visual facility inspections were recorded on the inspection form included with the facility's SWMP and provided to the client following completion of each quarterly event for permit-required recordkeeping practices.

Industrial Facility Stormwater Management Plan Development

Services Provided

- Prepared facility-specific Stormwater Management Plan (SWMP) in accordance with the Colorado General Permit, COR900000, Stormwater Discharges Associated with Non-Extractive Industrial Activity, for a grain milling facility in Denver, CO.
- Conducted site reconnaissance to identify pollutant sources and outfall locations.
- Worked with environmental manager and support staff for details on stormwater management practices, such as BMP selection and installation, for inclusion in the SWMP.



Project consisted of evaluation of the *Colorado Discharge Permit System (CDPS) General Permit COR900000 for Stormwater Associated with Non-Extractive Industrial Activity* for applicable requirements to the grain milling facility. Aquionix personnel performed a reconnaissance visit at the facility to identify potential pollutant sources, outfall locations and associated BMPs in efforts to accurately capture current site conditions for discussion in the SWMP, development of the stormwater inspection and monitoring program, and development of the site map.

SWMP development also included interpretation of the facility-specific Certification to Discharge, issued by the permitting authority. The Certification to Discharge assigned specific inspection, sampling and reporting frequency based on the facility's SIC code and immediate and ultimate Waters of the U.S. receiving stormwater discharge from the facility.

Mining Facility Stormwater BMP Installation and Maintenance

Services Provided

- Installed and maintained stormwater structural controls, including wattles, check dams, silt fence, signage, etc.
- Completed routine and as needed inspections of structural controls.



Colorado Erosion Control Supervisors from Aquionix worked closely with mine personnel to evaluate the effectiveness of existing stormwater structural controls. Where opportunities were identified, Aquionix completed the required fieldwork to improve the effectiveness of controls and performed as needed maintenance to ensure their continued effectiveness.

Grain Elevator EHS Management Systems

Services Provided

- Worked with facility personnel to create an EHS compliance calendar to manage regulatory and system responsibilities and track ongoing and completed projects.
- Facilitated monthly safety system meeting between multiple sites across the country.
- Conducted site audits and inspections to assist in compliance with OSHA's VPP.



Aquionix worked closely with multiple facilities to understand their needs and to develop a comprehensive compliance calendar tool supporting the identified needs. Aquionix played a hands on role in facilitating and managing the system including regulation requirements, training tracking, file management and more. Several of the facilities involved in the process have been awarded OSHA VPP status.

ISO 14001 & OHSAS 18001 Audits

Services Provided

- Scheduled, arranged and conducted internal audits of varying length and scope at multiple sites to assist clients in maintaining an effective Environmental Management System (EMS) or Safety Management System (OHSMS) and in meeting targets and objectives.
- Provided professional and thorough assessments of client EMS' using widely recognized audit principles, procedures and techniques.
- Delivered timely and comprehensive audit findings and reports to the client and assisted with additional requests for assistance with potential and/or identified system issues.

Aquionix experienced auditors provided audit services to ensure the facility is achieving and maintaining ISO 14001 and OHSAS 18001 standards.

Aquionix worked with management system staff to identify gaps and enhance environmental, health and safety measures throughout their site and ensure compliance with regulatory and system requirements.



Water Compliance Program Training

Services Provided

- Overview of the history of water compliance programs as their evolution into current regulations.
- Detailed breakdown of applicable stormwater program requirements based on facility-specific permits and acceptable methodology for sample collection.
- One-on-one and group training in a hands-on setting for acceptable inspection techniques and sample collection.

Project consisted of an in depth review of the facility’s stormwater permit for the development of a tailored training presentation on stormwater compliance requirements. Additionally, hands-on training was provided to field staff on:



- The proper use and methods of sample collection, including sample handling, equipment calibration, decontamination procedures, chain of custody preparation and sample shipment.
- The required inspection criteria and application of such criteria to the various stormwater management components to be inspected.
- The completion and implementation of corrective actions following routine inspections, sampling or monitoring of stormwater management components.