
MICHAEL J. MILLER, CHMM

Education

M.B.A., Business Administration, University of Missouri, 2001
B.S., Industrial Management, Arizona State University, 1994

Specialty Certifications

Certified Hazardous Materials Manager
Certified Asbestos Inspector/Management Planner/Project Designer
Certified 40-Hour Hazardous Waste Operations Worker
Certified Hazardous Waste Operations Site Supervisor

Professional Experience

Mr. Miller has a wide variety of experience in environmental management and consulting in both the private and federal sectors. He is an Environmental Practice area leader at SCS and oversees many of the environmental projects. He is experienced in a wide array of environmental health and safety (EH&S) programs and has successfully developed and implemented EH&S solutions at multi-location industrial facilities in the agricultural processing, chemical processing, distribution/transportation, metals, and pharmaceutical manufacturing sectors.

Prior to joining SCS, Mr. Miller was responsible for providing environmental compliance support to Postal Service facilities in 15 Western U.S. states. In this capacity, Mr. Miller forecasted, negotiated, and managed an annual budget of \$5,000,000. He effectively communicated environmental liabilities to senior management with regard to ongoing operations and planned capital projects, identified compliance alternatives and/or corrective actions to mitigate risk and monitored implementation of necessary actions. Specific environmental activities included asbestos, lead-based paint, and radon gas management, underground storage tank management, environmental auditing, spill planning, stormwater management, and other regulatory compliance activities.

Before his Federal service, Mr. Miller was an environmental consultant in Omaha, Nebraska where he provided a wide array of EH&S services to various industrial clients throughout the Midwest.

Example project experience includes:

Solid Waste

Construction Plans and Specifications: Mr. Miller has served as the Project Director for numerous landfill liner phase development projects in Nebraska. Responsible for coordinating SCS staff and assuring client timelines are met within budget, he has also provided QC review of project deliverables, assisted with preparation of engineer estimates, and provided bid review support for contractor selection.

Construction Quality Assurance: Mr. Miller has served as the Project Director for numerous landfill liner, closure, and gas system construction quality assurance (CQA) projects. In addition to his role coordinating SCS's staff, Mike has been principally responsible for negotiating client contracts, providing regulatory correspondence, and reviewing project deliverables.

Regulatory Compliance Support: Mr. Miller has provided regulatory support to landfills throughout Nebraska and the Midwest with respect to air quality, groundwater, stormwater, spill prevention, control and countermeasure, and various other compliance matters. He has successfully negotiated regulatory complaints in support of client operations and has helped prepare numerous compliance action plans to help clients come into compliance.

Site Assessment, Investigation, and Remediation

Phase I Environmental Site Assessments, Multiple Facilities; Midwest: Mr. Miller has performed in excess of 25 Phase I Environmental Site Assessments to help assess potential environmental liabilities associated with client acquisition and divestiture activities. These assessments have been performed in accordance with the ASTM standard in place at the time of the assessment as well as most recently with the EPA All Appropriate Inquiry rule.

Risk Based Corrective Action: Mr. Miller served as the project manager for a preliminary assessment, Tier 1 Site Investigation, and Tier 2 Site Evaluation for a former jet fuel pipeline release site in Bellevue, Nebraska. Mr. Miller coordinated site activities with the responsible party, landowner, and regulator and directly oversaw SCS field personnel and subcontracted drilling personnel for the sampling of existing groundwater monitoring wells and installation and sampling of new groundwater monitoring wells installed as part of the Tier 1. Subsequent to the Tier 1, and Tier 2 investigation using our company owned Geoprobe was performed for the subject property to evaluate the groundwater ingestion pathway. SCS is currently evaluating the site specific target levels and developing the remedial action to address the impacted groundwater.

Emergency Response Projects

PCB Site Characterization and Remediation: Mr. Miller served as the Project Manager for a remediation project completed by SCS for the Omaha Public Power District. Mr. Miller was responsible for client and regulatory communications associated with remediation activities at six substations with historic PCB contamination. Mr. Miller prepared the Work Plan, negotiated Work Plan Modifications on the clients' behalf, and identified various opportunities to reduce remediation waste disposal. Mr. Miller oversaw all environmental sampling activities, field laboratory analysis, and excavation activities for this effort. The project has been recognized by the Nebraska Industrial Council on the Environment (NICE) as the Environmental Project of the Year for 2005.

Transformer Oil Release (Spill Response): Mr. Miller managed the assessment and cleanup of two separate oil releases that occurred at the same location. The releases were the result of vandalism and each release had a different responsible party. Mr. Miller coordinated response activities, performed sampling, and directed excavation activities. Based on sample results

(PCBs), one release was managed under the EPA Spill Cleanup Policy and the other was managed as petroleum contaminated soils under the State's Integrated Waste Management rules.

Spill Response Services: Mr. Miller oversees SCS spill response services performed out of the Omaha office. Since 2006, spill response services have been provided to various clients (Utilities, Fuel Retailers, Sand and Gravel Operations) at over fifty different spill sites. Activities performed by Mr. Miller included initial call receipt (24 hours per day) and diagnosis, site reconnaissance and mitigative control strategy development, coordination of field equipment and manpower, cleanup activities and oversight, waste characterization, disposal coordination, and site restoration activities. As part of these spill events, Mr. Miller was responsible for all communications with the client representatives as well as the regulatory representatives; if necessary. In some cases additional follow on activities have been performed such as environmental sampling and reporting.

Underground Storage Tanks

Underground Storage Tank Auditing: Mr. Miller oversaw the UST auditing efforts for the US Postal Service's Midwest and Western Area regions. As part of this responsibility, Mr. Miller developed the auditing protocol to be used by internal staff (both environmental and facility staff) in the performance of internal UST inspections. Additionally, Mr. Miller contracted with a third-party and co-developed a training course to provide UST Inspection training to affected internal personnel. The training course covered regulatory background, USTs and ancillary equipment, leak detection and automatic tank gauging systems, and reporting requirements.

Underground Storage Tanks: Mr. Miller oversaw the removal of petroleum underground storage tanks in Nebraska, Iowa, and Missouri while at the US Postal Service. Mr. Miller was responsible for preparing all bid documents, evaluating bid submittals, overseeing contracted support, and reviewing and approving closure documentation.

Leaking Underground Storage Tanks: Mr. Miller successfully managed risk-based corrective actions at seven leaking underground storage tank sites in Nebraska and South Dakota resulting in "No Further Action" letters from the state regulatory authority.

Environmental Compliance

Spill Prevention Control and Countermeasures Plan: Mr. Miller developed an SPCC Plan for an asphalt terminal in central Nebraska with onsite storage capacity in excess of 5 million gallons. As part of this effort, Mr. Miller completed the site visit and data acquisition efforts, communicated site conditions to an SCS professional engineer, drafted the written plan, and completed the substantial harm analysis.

Storm Water Management Plans: Mr. Miller provided senior support for the inspections of nearly 40 waste hauling facility repair shops and transfer stations and the development of storm water management plans. As part of this effort, Mr. Miller was responsible for evaluating the need for industrial storm water discharge coverage, determining if a "no exposure" condition existed, and assuring that a "notice of intent" was submitted to the appropriate state for coverage if a permit was required.

Environmental Reconnaissance Study: Mr. Miller oversaw an environmental reconnaissance study of electric utility assets at Offutt Air Force Base. The purpose of this effort was to document any potential liabilities associated with the assets which were being transferred to our client as part of the base privatization effort. Mr. Miller reviewed available environmental literature related to the utility assets; reviewed prior PCB sampling results for on base transformers, performed limited sampling of utility substations for PCB contamination, and determined SPCC applicability for each substation.

Internal Environmental Compliance Review Program: Mr. Miller developed, implemented, and managed an area-wide internal environmental auditing program that increased visibility of the EH&S personnel, increased the credibility of EH&S initiatives, and reduced issues of non-compliance 86% in first year. This program included 185 of the highest-risk facilities and resulted in nearly 400 internal reviews each year.

RCRA Compliance Audit: Mr. Miller performed a comprehensive RCRA compliance audit for two galvanizing plants in Oklahoma; both which were large quantity generators of hazardous waste. Activities included a comprehensive review of recordkeeping procedures (i.e. manifesting, waste profiling, etc) for the past five years, a thorough review of onsite activities and waste handling and storage procedures, and development of findings and recommendations. The audit was performed in preparation for a State and EPA scheduled audit for which there were no issued letters of warning or notices of violation.

Asbestos and Lead Management Projects

Asbestos Management; Multiple Manufacturing Sites; Midwest: Mr. Miller completed asbestos inspections, developed management plans, and provided employee training to several manufacturing clients to comply with OSHA asbestos standards. He further assisted one client with the project design and abatement of thermal system insulation located in a large boiler / mechanical room.

Asbestos and Lead-based Paint: Mr. Miller successfully prepared, negotiated, and managed 20 task orders in excess of \$12 million to complete asbestos and lead-based paint surveys at all Postal Service facilities in the Midwest Area. Mr. Miller realized 35% reductions in asbestos and lead-based paint inspection related project costs through scope management and contractor negotiation, saving a total of \$2.8 million for the U.S. Postal Service.

Asbestos Inspection and Demolition Cost Estimate: Mr. Miller oversaw an asbestos inspection for NESHAP demolition purposes at a former manufactured gas plant in Council Bluffs, Iowa. Based on the asbestos inspection results, detailed abatement costs were developed for the removal of asbestos containing materials, and an engineering estimate was developed for the demolition of onsite structures and site restoration activities (i.e. grading). Based on the cost estimates and availability of year end funds, the client decided to proceed with the abatement, demolition, and site restoration activities. Mr. Miller served as the project manager responsible for all phases of the project effort including, but not limited to, bid specification development, contract bidding, subcontractor selection and negotiation, regulatory notifications, coordination and phasing of the work phases, utility shutoffs, and overall project CQA.

Asbestos Inspection and Abatement: Mr. Miller performed an asbestos inspection at a former Denny's restaurant building located in Omaha, Nebraska under consideration for purchase by a client for redevelopment as a convenience / fuel facility. The property was ultimately purchased for redevelopment and Mr. Miller oversaw the bid specifications development, negotiated and subcontracted with a licensed asbestos abatement contractor, filed the necessary NESHAP notifications with the Nebraska Department of Health and Human Services and Nebraska Department of Environmental Quality, provided full time oversight during the abatement activities, and performed the final visual inspection following abatement. In all, approximately 500 square feet of sheet vinyl flooring was abated as well as a previously unidentified mastic material that SCS identified during the abatement effort, sampled, and found to also be asbestos-containing. The project was completed within two days of the client closing on the property allowing for the immediate demolition and development of the subject property.

Air Quality Compliance

Air Construction Permit Application – Omaha Steel Castings, Co.: Project director for the preparation and submittal of an air construction permit application for a new Greenfield steel foundry near Wahoo, Nebraska. Mr. Miller oversaw preparation of the air construction permit application, which included the development and use of source-specific emission factors, detailed potential emission calculations, and analysis of applicable local, state and federal air regulations.

MACT/NESHAP Compliance Assistance & Emission Control Retrofitting – Metropolitan Utilities District: Mr. Miller was the project director for an effort to bring 55 reciprocating internal combustion engines into compliance with NESHAP Subpart ZZZZ, NSPS Subpart IIII, and NSPS Subpart JJJJ requirements at 15 facilities owned by Metropolitan Utilities District, the City of Omaha's water and natural gas utility. Mr. Miller assisted with the regulatory applicability and compliance determinations, compliance gap analyses, regulatory notifications and compliance deadline extensions, and emission control engineering cost estimates for each engine. As part of this analysis, 13 engines were identified which would require installation of catalytic reduction and continuous parametric monitoring systems. Baseline emission testing, bid specification development, contractor bid review, and construction observation for each engine was performed as part of this project.

Air Quality Compliance Support: Mr. Miller provided air quality compliance support to the City of Lincoln to address a Prevention of Significant Deterioration (PSD) identified increment violation. As project manager for this effort, he oversaw all modeling efforts (ISCST3 and AERMOD) and negotiated and corresponded directly with the local, state, and federal regulatory authority on behalf of the client. In addition to the PSD related services, SCS is also providing Title V and Emission Inventory Questionnaire related services to the City.

Tier II Gas Evaluation: Mr. Miller was the project manager for a Tier II gas evaluation at the Grand Island, Nebraska landfill. As project manager, Mr. Miller developed the Tier II work plan, coordinated both State and EPA approval of the work plan, scheduled and coordinated onsite activities, and prepared the final Tier II evaluation report. As part of this effort, Mr. Miller gained approval from the USEPA for a modification to EPA Method 25C. The approved modification is available on the EPA Technology Transfer Network website for use nationwide.

Tier II Gas Evaluation: Mr. Miller is currently serving as the project manager for a Tier II gas evaluation at the G&P Development Landfill in Milford, Nebraska. As project manager, Mr. Miller is responsible for development of the Tier II work plan including sample locations, coordination with the State Agency for approval of the work plan, scheduling and coordinating onsite activities, and ultimately developing the estimated emission rate and preparing the final Tier II evaluation report.

Annual Emission Inventory Questionnaires: Mr. Miller serves as the project manager with QA/QC responsibility for the preparation and submittal of annual emission inventory reports and annual and semi-annual certifications of compliance and exception reporting for three different landfills in Nebraska. This is an ongoing multi-year project.

Greenfield Ethanol Plant; Construction Permitting: Mr. Miller is currently serving as the project manager for the development of an air construction permit for a 110 million gallon per year ethanol plant to be constructed in west-central Illinois. In this capacity, Mr. Miller is responsible for communications with the client and project team members, coordinating in-house technical staff, and assuring project timelines and objectives are being met.

Corporate Air Compliance Support – National Convenience/Gasoline Retailer: Project director responsible for evaluating applicability of onsite reciprocating internal combustion engines to recently promulgated federal MACT and NESHAP standards at facilities in Arizona, Texas, Missouri, and Georgia, and assisting each facility in complying with operational, maintenance, testing and emission requirements. Oversaw development of controls bid specification development and provided regulatory correspondence support with both the state and US EPA.

Air Permitting; Multiple Industrial Facilities; Midwest: Mr. Miller obtained, on behalf of 10 manufacturing clients, Construction and Title V Operating Permits and successfully negotiated permit limitations with regulatory authorities. In one instance, he negotiated a variance to allow for immediate ground breaking of a green field project prior to receipt of a construction permit.

Air Compliance; Multiple Industrial Facilities; Midwest: Mr. Miller provided Form R, Tier II, and Annual Emission Inventory services to various industrial clients to assist them in meeting federal and state reporting requirements.

Industrial Hygiene Services

Respiratory Protection Program: Mr. Miller developed a written respiratory protection program for a vehicle repair and maintenance shop. The written plan was developed to comply with OSHA requirements and addressed potential inhalation hazards associated with repair, body work, and painting activities, identified necessary types of respiratory protection (i.e. ½ face, supplied air, etc.), and detailed training requirements.

Indoor Air Quality Testing and Evaluation: Mr. Miller recently completed an investigation of potential exposure issues for a renewable fuels facility which converts animal fats to a fuel oil. The investigation was driven by employee comfort complaints and included the use of assay badges, silica gel tubes, and minicans to evaluate ammonia, sulfuric acid, various amines, and over 72 different volatile organic compounds.

Indoor Air Quality Evaluation: Mr. Miller was recently involved in an indoor air quality evaluation at a Post Office in Delta, Iowa. The evaluation was performed in response to both Postmaster and customer complaints about poor air quality and possible related symptoms (i.e. headaches, nausea, etc.). Mr. Miller coordinated the site activities, aided in developing the site review methodology, and reviewed the direct reading instrumentation results from the evaluation. A final report detailing the findings and conclusions was prepared and submitted to the client for further action.

Air Monitoring: Provided OSHA exposure air monitoring services for a pharmaceutical manufacturer. Specifically, performed personnel exposure monitoring to quantify potential exposure to total suspended carcinogenic dusts and respirable carcinogenic dusts generated during a milling process. Based on the analytical results, provided recommendations to minimize exposure.

Indoor Air Quality; Multiple Facilities; Midwest: Mr. Miller performed heat exposure monitoring to address an OSHA inquiry letter and drafted a client response letter to OSHA. He further assisted the client in assessing all areas of potential exposure for in-house monitoring purposes. No violation was issued. Mr. Miller also performed physical and chemical exposure monitoring at numerous other manufacturing facilities to assist clients with their EH&S compliance activities.

Air and Noise Monitoring: Provided OSHA exposure air monitoring and noise monitoring services for a manufacturing facility in Hastings, Nebraska. Specifically, performed personnel and area exposure monitoring to quantify potential exposure to total dusts and volatile organic compounds at various processes throughout the facility.

Heat Stress Monitoring: Provided heat stress monitoring services for a leather tanning facility in Omaha, Nebraska. Monitoring was performed using the Wet Bulb Globe Temperature Index technique to determine worker heat loads for comparison to established Threshold Limit Values.

Indoor Air Investigations and Evaluations: While with a previous employer, Mr. Miller contracted for and managed in excess of twenty five indoor air quality evaluations. Evaluations ranged from asbestos fiber release episodes to possible mold contamination to unknown and/or suspected workplace contaminants.