TIA JETER, P.E.

Education

M.S. Environmental Engineering, University of Kansas - Lawrence, 2004
B.S. Chemical Engineering, University of Kansas - Lawrence, 2001

Professional Licenses

Professional Engineer in Iowa, Kansas, and Missouri

Professional Experience

Ms. Jeter is a Senior Project Manager with over 18 years of chemical and environmental engineering experience. Her expertise lies in her experiences providing high-level air quality compliance and permitting strategy and troubleshooting, as well as landfill gas system performance evaluation and design. Tia has a demonstrated depth of technical expertise with ambient air dispersion modeling analysis, New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) compliance, Prevention of Significant Deterioration (PSD) applicability and analysis, air planning and permitting, environmental auditing and reporting, landfill gas control system planning, and environmental compliance. Example project experience includes:

Air

Air Permitting, Sabine River Works, Ethylene Unit – DuPont: Ms. Jeter served as the Environmental Coordinator for the ethylene unit at Sabine River Works DuPont site. One of her responsibilities was to oversee the preparation and finalization of the unit's Title V permit. This included review of draft permits, compliance plan development, and permit finalization. Ms. Jeter was responsible for the preparation of the New Source Review (NSR) permit renewal. Her responsibilities also required development and submittal of various construction permits/permits by rule for frequent design changes made to the Ethylene Unit.

Hydrogen Utilization Project, Sabine River Works, Ethylene Unit – DuPont: Ms. Jeter served as the environmental engineer of a project to use byproduct hydrogen as an additional fuel source for a unit flare and steam super-heater. Her responsibilities included submitting a standard permit for the pollution project, calculating the potential emissions of the project and coordinating stack testing of the applicable emission units.

Client Manager – Ray-Carroll County Grain Growers: Ms. Jeter is the client manager and lead engineer providing air compliance services to Ray-Carroll County Grain Growers, Inc. facilities located throughout Missouri. Ms. Jeter provides air compliance services including preparation and submittal of Title V permit reports; submittal of annual emission inventories; NSPS and National Emission Standards for Hazardous Air Pollutant (NESHAP) applicability determinations; and preparation and submittal of air construction permits, including air dispersion modeling. Ms. Jeter also acts as a technical expert providing not only routine permitting and compliance assistance, but also serves as an on-call resource for questions related to operational compliance and strategic/comprehensive planning for applicable draft regulations and proposed projects.

Odor Dispersion Modeling, Orange County Waste & Recycling (OCWR): Ms. Jeter provided air dispersion modeling support for a project conducted to evaluate odor complaints from local

residents in the vicinity of the Frank R. Bowerman (FRB) landfill in Orange County, California. Tia utilized the results of odor samples collected by SCS, and air flow and surface flux rates of landfill odor sources to prepare an atmospheric dispersion model of the odor sources at the FRB landfill. She used the refined, steady-state, multiple source, Gaussian dispersion model, AERMOD, to conduct the refined odor impact modeling. The results of the modeling indicated that operations of the FRB landfill were not the likely source of the offsite odor complaints. Ms. Jeter further evaluated the impacts of proposed composting operations by conducting an additional modeling analysis which included odor profiles for composting operations developed for another OCWR facility. The results of the additional analysis suggested that the addition of composting operations at the FRB landfill would not contribute to offsite odors.

Point Source Modeling, Omaha Steel Castings: Ms. Jeter conducted the air dispersion modeling analysis, utilizing AERMOD, for the construction of a steel foundry in Nebraska. Her initial responsibility required development of a modeling protocol for submittal and approval by the Nebraska Department of Environmental Quality (NDEQ). Following approval of the modeling protocol, Ms. Jeter conducted the dispersion modeling analysis for the pollutants which exceeded the Prevention of Signification Deterioration Significant Levels; this included dispersion modeling for emissions of particulate matter less than 10 microns in diameter (PM_{10}) and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). Ms. Jeter performed a screening analysis to determine if the impacts from the proposed facility were significant. Based on the results of the screening analysis, Ms. Jeter conducted a full impact analysis incorporating emissions from nearby facilities to evaluate compliance with the applicable NAAQS averaging standards. The results of the full impact analysis indicated changes to the proposed facility, such as additional emissions controls, were required for the installation to comply with the NAAQS. Ms. Jeter assisted in the identification of the required controls.

Non-Point Source Modeling, Bluff Road Landfill: Ms. Jeter performed the air dispersion modeling for particulate matter emissions being produced at the facility in order to determine compliance with NAAQS. Ms. Jeter utilized the modeling program Industrial Source Complex Short Term (ISCST3), to predict the emissions resulting from multiple area and volume sources on the facility. Ms. Jeter conducted an analysis of various options to reduce particulate matter generated at the facility including operational and equipment modifications. Based on the evaluation and subsequent modeling performed, the facility was presented with multiple options of varying cost and scope that would bring the facility into compliance with the NAAQS. Following submittal of the compliance plan, the facility was required by the regulatory agency to reevaluate the modeling utilizing AERMOD. As such, Ms. Jeter modeled the facility emissions utilizing AERMOD and developed a new compliance plan based on the new results.

Title V Permit Modification, Wheatland Landfill: Ms. Jeter performed modeling of the fugitive emissions from the landfill, with the use of Landfill Gas Emissions Model (LANDGEM), which demonstrated that the facility is not currently and will not in the future be required to operate and control their gas system in compliance with NSPS requirements. Therefore, Ms. Jeter prepared a Title V permit modification requesting the removal of NSPS gas collection and control system requirements from the permit for the facility.

RICE MACT Compliance Assistance & Stack Testing – City of Lee's Summit, Missouri: Ms. Jeter was responsible for evaluating a rock crusher located at the Lee's Summit Resource Recovery Park (RRP) for compliance with the MACT standard for Reciprocating Internal Combustion Engines (RICE). Ms. Jeter notified the City of the applicability of the rock crusher engine to the RICE MACT and discussed the various compliance options with City personnel. The City utilized the information provided to procure and install a catalytic converter to meet the applicable emission standard. Following

installation of the control device, Ms. Jeter coordinated the baseline emission testing to verify the engine could meet the required standard, and subsequently is coordinating completion of the EPA Method-compliance stack testing and associated regulatory notifications and reporting.

NESHAP Subpart ZZZZ Compliance Assistance – City of Springfield, Missouri: Ms. Jeter was responsible for evaluating over 35 engines owned and operated by the City of Springfield, Missouri for compliance with NESHAP Subpart ZZZZ, NSPS Subpart IIII, and NSPS Subpart JJJJ requirements. Ms. Jeter managed the project which included evaluation of engine data provided by the client, organization of engines into applicable compliance groups, identification of compliance requirements, and preparation of a compliance summary report.

RICE MACT Compliance Stack Testing – Deffenbaugh Industries, Inc.: Ms. Jeter was responsible for evaluating a tub grinder located at the Johnson County Landfill for compliance with NESHAP Subpart ZZZZ. Ms. Jeter discussed the applicability of the tub grinder engine and compliance options with Deffenbaugh staff. Based on these discussions, Deffenbaugh industries purchased and installed a catalytic converter to reduce emissions of carbon monoxide. Following installation of the control device, Ms. Jeter coordinated the baseline emission testing to verify the engine could meet the required standard, and is currently coordinating completion of the EPA Method-compliance stack testing and associated regulatory notifications and reporting.

Air Compliance Support – Blue Sun St. Joe Refining, LLC: Ms. Jeter is the senior project manager and lead engineer providing air compliance services for Blue Sun St. Joe Refining, LLC; a biodiesel production facility located in St. Joseph, Missouri. Ms. Jeter provides air compliance services including preparation and submittal of construction and operating permit applications; annual emission reporting; NESHAP applicability determinations; NSPS performance testing coordination; GHG reporting applicability; and LDAR compliance services. As part of her role, Ms. Jeter acts as a technical expert providing not only routine permitting and compliance assistance, but also serving as an on-call resource for questions related to daily operational compliance and strategic/comprehensive planning for applicable draft regulations and proposed facility projects.

NESHAP RICE Compliance Assistance – Seaboard Foods LLC: Ms. Jeter was responsible for evaluating over 170 engines located at facilities in Colorado, Kansas and Oklahoma for compliance with NESHAP Subpart ZZZZ, NSPS Subpart IIII, and NSPS Subpart JJJJ requirements. Ms. Jeter managed the project which included evaluation of engine data provided by the client, organization of engines into applicable compliance groups, identification of compliance requirements, and preparation of a compliance summary report.

Corporate Air Compliance Support – Ray-Carroll County Grain Growers, Inc.: Ms. Jeter is the senior project manager providing air compliance services for Ray-Carroll County Grain Growers, Inc. Ms. Jeter provides air compliance services including Title V compliance reporting, preparation and submittal of state construction and operating permit applications; annual emission reporting; and NSPS and NESHAP applicability determinations for various Ray-Carroll County Grain Growers, Inc. facilities located throughout Missouri.

Soybean Processing and Biodiesel Facility Permitting – Prairie Pride: Ms. Jeter assisted with the permit applicability determination and subsequent construction permit submittal for a new soybean processing facility. The initial phase of the project included a PSD determination with the preliminary pre-construction monitoring protocol analysis. Ms. Jeter performed the emissions calculations and dispersion modeling required to show compliance with the National Ambient Air Quality Standards (NAAQS) and the increment analysis. Her participation also included preparation of permit drawings and assistance with the construction application development.

Air Compliance Support – Show-Me Ethanol, LLC: Ms. Jeter is the client manager and lead engineer providing air compliance services to Show-Me Ethanol; an ethanol production plant located in Carrollton, Missouri. Ms. Jeter provides air compliance services including preparation and submittal of Title V permit reports; submittal of annual emission inventories; annual GHG reporting; NSPS and NESHAP applicability determinations; and Renewable Fuel Standard registration updates. Ms. Jeter also acts as a technical expert providing not only routine permitting and compliance assistance, but also serving as an on-call resource for questions related to operational compliance and strategic/comprehensive planning for applicable draft regulations and proposed projects.

Air Compliance Support – Engineered Air: Ms. Jeter is the senior project manager and is responsible for providing air compliance services to Engineered Air; a custom heating, ventilation and cooling manufacturer, located in De Soto, Kansas. The facility is located in a maintenance area for VOCs; therefore, the plant is subject to a Reasonably Available Control Technology (RACT) standard for VOCs and is also a major source of hazardous air pollutants (HAPs) subject to a NESHAP Maximum Achievable Control Technology (MACT) standard. As part of her responsibilities Ms. Jeter prepares Title V and semiannual MACT reports and annual emission inventories. Ms. Jeter also maintains and updates the compliance spreadsheet that was developed to assist the facility with recording keeping and compliance demonstration requirements for the RACT and MACT standards.

Title V Permit Application and Compliance Assistance, Lee's Summit Resource Recovery Park : Ms. Jeter provides numerous services to the Lee's Summit Resource Recovery Park (RRP), including air compliance assistance. As part of these services, Ms. Jeter identified an error in the NSPS Subpart WWW applicability that had been conducted by a previous consultant. Following an explanation of the previous oversight and potential consequences to the Lee's Summit RRP, Ms. Jeter contacted the Missouri Department of Natural Resources to explain the compliance history of the facility and propose a compliance plan and timeline to correct the error. As part of the compliance plan, Ms. Jeter managed the completion of Tier 2 testing at the facility and completed and submitted the initial Title V permit application. She assisted the facility with review and comment on the draft permit. Upon issuance of the final permit, Ms. Jeter provided the facility an overview of the monitoring and reporting requirements. She continues to work with the Lee's Summit RRP on preparation and submittal of the requisite air compliance reports.

Corporate Air Compliance Support – Seaboard Foods LLC: Ms. Jeter is the senior project manager and lead engineer providing air compliance services to Seaboard Foods LLC. Ms. Jeter provides air compliance services including preparation and submittal of state construction and operating permit applications; annual emission reporting assistance; NESHAP applicability determinations; NSPS performance testing coordination; and Renewable Fuel Standard registration updates at facilities located in Kansas, Colorado, and Oklahoma. Ms. Jeter also serves as an on-call resource for questions related to daily operational compliance and strategic/comprehensive planning for applicable draft regulations and proposed projects.

Prevention of Significant Deterioration (PSD) Permitting – American Energy Producers, Inc.: Ms. Jeter assisted with the PSD permit application for this greenfield soybean extraction and biodiesel production facility. Tia completed the dispersion modeling analysis for emissions of particulate matter less than ten microns (PM_{10}). The analysis included calculating the potential emissions of the facility and performing dispersion modeling utilizing the modeling program Industrial Source Complex Short Term (ISCST3) to evaluate the proposed project's compliance with the NAAQS and increment standard. Ms. Jeter worked closely with the team members on her project throughout the duration of the project to complete the submission of a PSD permit application in a relatively short period of time.

Dispersion Modeling – Ray-Carroll County Grain Growers, Inc./Show-Me Ethanol, LLC: Ms. Jeter performed the dispersion modeling analysis for this combined plant that was required to obtain the minor source permit for construction of a 60.5 million gallon ethanol plant. Ms. Jeter worked closed with her team members to evaluate different modeling scenarios based on the facets of each plant's operations to determine operating parameters that would allow sufficient freedom in day-to-day operations while simultaneously demonstrating compliance with the National Ambient Air Quality Standards (NAAQS) and increment consumption for PM_{10} emitted from the site. Following obtainment of the initial construction permit, Ms. Jeter re-evaluated the modeling exercise as part of an evaluation of options to decrease the level of restrictions on plant operations while maintaining a compliant modeling exercise. A permit modification was subsequently obtained that incorporated these decreased limitations.

Emission Inventory Questionnaire (EIQ): Ms. Jeter prepared the EIQs for the DuPont ethylene unit and multiple landfills within Missouri, Kansas and Oklahoma, including several Allied Waste Landfills and the Lee's Summit Sanitary Landfill. Ms. Jeter utilized MOEIS, the online Missouri Emissions Inventory System, to submit several of the landfill's EIQs electronically.

Construction Permit, Prairie View Regional Waste Facility and Lamar Sanitary Landfill: Ms. Jeter prepared the construction permit application for a vertical expansion and the installation of two flares at the waste facilities. This included applicability determination for federal and state requirements and point source modeling with the use of SCREEN3 to determine possible impacts to the ambient air quality. Ms. Jeter also performed a landfill gas evaluation using results of gas sampling performed at the facility to determine the potential value of the landfill gas as an alternative fuel source.

Construction and Operating Permit Modification, Southeast Landfill: Ms. Jeter prepared a request for modification of the construction permit that had been submitted for the installation of the landfill gas flare. It was requested to permit the maximum potential of the flare in place of the potential gas production of the landfill. It was proposed to incorporate the amended construction permit into the operating permit for the facility.

Off-Permit Change and Application to Construct, Jefferson City Landfill: Ms. Jeter prepared and submitted the construction permit application for a landfill flare as well as a request for an off-permit change for the facility Title V permit. Included in the construction permit request was an applicability determination for federal and state requirements and point source modeling with the use of SCREEN3 to determine possible impacts to the ambient air quality. The requested off-permit change proposed the removal of a site specific monitoring requirement, which Ms. Jeter was able to show through historic records and emissions calculations, was not longer warranted.

Title V Permit Renewal, Prairie View Regional Waste Facility and Lamar Sanitary Landfill: Ms. Jeter prepared and submitted the Title V permit renewal application for the facility. This required evaluating all emission sources on site to determine applicability to permitting and regulatory requirements. Ms. Jeter performed the required emissions calculations and prepared all forms and the engineering report necessary to submit a technically complete renewal application.

Preconstruction Modeling – American Energy Producers: Ms. Jeter conducting the preliminary air dispersion modeling based on the emissions from a similar sized facility. The results of the modeling were used to determine the appropriate location for placement of preconstruction monitors that were required as part of the Prevention of Significant Deterioration (PSD) construction permitting process.

Modeling Services, Engineering Automation & Design: Ms. Jeter conducted the air dispersion modeling analysis, utilizing AERMOD, for the construction of a biodiesel facility in Iowa. Her responsibilities included completing an air modeling analysis report for all pollutants which exceeded the Prevention of Signification Deterioration Significant Levels. Ms. Jeter performed dispersion modeling for emissions of nitrogen oxides and particulate matter to demonstrate that the proposed facility would be in compliance with all applicable NAAQS averaging standards. The model analysis report and modeling files were submitted to the Iowa Department of Natural Resources where they were reviewed and approved.

Air Services, American Environmental Landfill: Ms. Jeter has provided various air services to the landfill located near Sand Springs, Oklahoma. As part of the services provided, Ms. Jeter reviewed a version of the Title V permit that the Oklahoma Department of Environmental Quality had drafted prior to going to public notice. Ms. Jeter coordinated directly with personnel at the air quality division of the ODEQ regarding changes and updates to the permit as a final review process. Additionally, Ms. Jeter has provided general air compliance assistance services to the landfill including submittal of annual emission inventories, preparation of compliance reports, development of a greenhouse gas monitoring plan, and submittal of annual greenhouse gas reports.

Air Services, Montauk Energy: Ms. Jeter prepared the construction permit application for a the installation of a flare at the American Environmental Landfill on behalf of Montauk Energy who operates a landfill gas to energy project at the facility. This included the calculation of potential emissions for the project and determination of applicability to federal and state requirements.

Greenhouse Gas Reporting – Ms. Jeter has provided engineered services related to compliance with the Greenhouse Gas (GHG) Reporting rule for numerous facilities, including landfills and chemical processing plants. Her services have included GHG applicability determinations, development of GHG monitoring plans, collection of required data for GHG reporting, development of reports, and submittal of information through the EPA's electronic GHG reporting tool, e-GGRT.

Environmental

Compliance, Sabine River Works, Ethylene Unit – DuPont: Ms. Jeter was responsible for assuring that the ethylene unit maintained compliance with all applicable requirements. Her responsibilities included conducting the required environmental recordkeeping and reporting, performing monthly environmental audits, and managing notifications of environmental incidents to the appropriate regulatory agency. Additionally, Ms. Jeter was responsible for coordinating the fugitive emissions monitoring program which included managing the contractors who performed the monitoring and ensuring that all monitoring and maintenance activities were performed within the required timelines.

Control Device Performance Testing, Sabine River Works, Ethylene Unit – DuPont: Ms. Jeter was responsible for coordinating and overseeing the performance testing of a boiler that was also used as a control device. Her participation required managing the stack testing, coordinating with the operators to maintain the required process rates, and submitting the compliance demonstration report to the regulatory agency.

Fugitive Emissions Monitoring Program, Sabine River Works, Ethylene Unit – DuPont: Ms. Jeter was responsible for coordinating the fugitive emissions monitoring program for the ethylene unit. Her responsibilities included managing the contractors that were attained to perform the monitoring, ensure that the required monitoring and repair efforts were conducted within the required time frame and submitting all reports as required by the applicable permit.

University of Kansas, Environment Health and Safety Department: Ms. Jeter served as an environmental technician for the EHS department. Her responsibilities included managing and disposing of hazardous materials generated in University facilities, monitoring water quality, and responding to hazardous waste spills. In addition, Ms. Jeter assisted with indoor air quality issues encountered in University laboratories.

SPCC Plan – L&K Services, Inc. n: Ms. Jeter was responsible for preparing the Spill Prevention, Control, and Countermeasures Plan for the L & K services facility located in Louisburg Kansas. Ms. Jeter conducted a site visit to identify all applicable storage tanks and containment areas as well as to perform a review of onsite records and procedures. Based on the results of the site visit, the SPCC plan was developed and submitted to the facility.

Solid Waste

Gas System Design, Courtney Ridge Landfill, LLC: Ms. Jeter assisted with the redesign of the gas collection and control system to comply with New Source Performance Standards. Her participation included landfill gas generation calculations, vertical gas collection well design and placement, pipeline sizing, design report preparation and submittal. Ms. Jeter utilized the modeling program KYGAS as part of the headloss analysis to adequately size the piping and the blower for the system.

Hamm Sanitary Landfill; Perry Kansas: Ms. Jeter served as project engineer during the construction quality oversight of a landfill liner. Her responsibilities included being onsite daily to observe lift placement, construction material quality, and perform nuclear density testing to ensure adequate compaction had been achieved.

Compliance Reporting: Ms. Jeter has prepared and submitted several compliance reports for landfills located in Kansas and Missouri. Reports submitted include annual compliance certifications, startup, shutdown and malfunction reports, as well as New Source Performance Standards Subpart WWW compliance reporting.

Gas System Design, Forest View Landfill, LLC: Ms. Jeter served as the project engineer for the redesign of the gas collection and control system which was initiated by the approval of a horizontal expansion at the facility. Her participation included vertical and horizontal gas well placement, pipeline sizing and location, head loss analysis with the use of KYGAS modeling software, and design and submittal of the revised the Gas Collection and Control System Design Report. Furthermore, Ms. Jeter has frequently developed the construction drawings for the expanding phases of the gas system as they are installed.

Gas System CQA: Ms. Jeter has conducted construction quality assurance for various landfills located throughout Missouri and Kansas during gas system construction. This had included observation and documentation of gas well construction, pipeline installation as well as gas system testing.

Geoprobe Cover Investigation, Bridgeton Landfill: Ms. Jeter assisted with the cover investigation conducted at the facility to determine the amount of material present over the surface of the landfill. A track-mounted geoprobe was utilized to drive sample bores into the cover material to allow visual determination of cover thickness. In areas where the geoprobe was unable to reach, Ms. Jeter used a hand auger to bore through the cover material and determine total thickness.

Compliance Assistance, Privately Owned Landfill and Golf Course, Kansas City, Missouri: The facility consists of a closed pre-Subtitle D landfill overlain by a golf course development, which includes

tracts of land for residential housing in addition to golf course facility amenities such as a clubhouse. Ms. Jeter managed several projects at the facility related to struggles with gas migration and site management. Her responsibilities have included development of a Landfill Gas Monitoring Plan, management of a lake liner leakage investigation, and evaluation of site conditions for compliance with solid waste regulations. Ms. Jeter has also reviewed the facility history, including historic violations and consent agreements, to identify the outstanding compliance requirements and develop a path forward for the facility to comply.

Gas System Redesign, Jefferson City Landfill: Ms. Jeter assisted with the redesign of the gas collection and control system to comply with New Source Performance Standards. Her participation included landfill gas generation calculations, vertical gas collection well design and placement, pipeline sizing, design report preparation and submittal. Ms. Jeter utilized the modeling program KYGAS as part of the headloss analysis to adequately size the piping and the blower for the system.

Gas Remediation Plan and Gas System Design, American Environmental Landfill: Ms. Jeter prepared and submitted a revised gas remediation plan for the facility. This included updating the design of the passive gas system with the ability to convert the system to active gas collection in the future. The monitoring and reporting plan was updated to reflect the design changes and submitted to the ODEQ for approval. Following approval of the gas remediation plan, AEL decided to move forward with the active collection of the landfill gas as part of a beneficial reuse project with Montauk Energy. Ms. Jeter has provided engineering services related to the active gas collection system including design of expansions to the system and development of construction plans and specifications.

Gas System Evaluation and Compliance Assistance, Deffenbaugh Industries: Ms. Jeter is the senior project manager and lead engineer providing services to Deffenbaugh Industries related to an evaluation of the gas system at the Johnson County Landfill and compliance with the facility's Title V operating permit, as required by conditions of an agreement with the KDHE. As part of these services, Ms. Jeter managed a project to evaluate the existing gas extraction system, including a field analysis of well conditions and liquid measurements, and in depth modeling of expected gas generation rates. Results of the evaluation were summarized in a report for submittal to the KDHE. Her responsibilities also included updating the landfill's Gas Collection and Control System Design Report as required by NSPS. In addition to the gas system services, Ms. Jeter also developed an Air Environmental Management System Plan detailing the facility's air compliance requirements and procedures to be implemented by Deffenbaugh Industries to assist the facility with complying with the applicable air compliance requirements. Ms. Jeter continues to provide Deffenbaugh assistance with response to comments and attendance at regulatory meetings with the KDHE.

Gas System Design, Lemons Landfill: Ms. Jeter assisted with the redesign of the gas collection and control system to comply with New Source Performance Standards. Her participation included landfill gas generation calculations, vertical gas collection well design and placement, pipeline sizing, design report preparation and submittal. Ms. Jeter utilized the modeling program KYGAS as part of the headloss analysis to adequately size the piping and the blower for the system.

Compliance Assistance, Privately Owned Landfill, Kansas City, Missouri: Ms. Jeter manages several projects at the landfill aimed at assisting the facility with compliance related to ongoing struggles with gas migration and site management. Her responsibilities have included development of a Landfill Gas Monitoring Plan and Landfill Management Plan. She is involved with a project to reevaluate the design of the gas extraction system to identify any potential improvements that can be made to help reduce the potential for gas migration. In addition, she manages the ongoing monitoring and maintenance of the gas system which is partially conducted by field personnel with

Aquaterra. Ms. Jeter also assists the facility with the preparation and submittal of compliance reports, including discharge monitoring reports and monthly gas probe results.

Compliance Tracking Database – Republic Services, Inc.: Ms. Jeter conducted an extensive review of permits held by each of a dozen landfill facilities within the state of Kansas as well as federal, state and local regulations. Applicable water; air; solid and hazardous waste; Spill Prevention, Control and Countermeasure (SPCC); and Emergency Planning & Community Right to Know (EPCRA) monitoring, recordkeeping and reporting requirements were identified to be inserted into a corporate-wide compliance database tracking tool.

Groundwater

Groundwater Monitoring Reports: Ms. Jeter has developed and submitted groundwater monitoring reports for facilities in Kansas, Missouri and Nebraska. Her responsibilities included evaluation of laboratory results, examination of site specific hydrogeology, and statistical analysis of groundwater data. Ms. Jeter has completed 14.5 professional hours in applied groundwater statistics and has experience with two statistical programs, SANITAS and DUMPSTAT.

Groundwater Monitoring: Ms. Jeter has assisted in conducted groundwater monitoring events at various facilities in Kansas and Missouri. Her participation included measurements of groundwater levels, purging of groundwater wells and sample collection.

Gas

Gas System Design, Installation, and Management, Lee's Summit Resource Recovery Park: Ms. Jeter serves as the manager for the gas system projects at the Lee's Summit Resource Recovery Park, which have included the redesign, installation and management of the gas collection and control system. As part of the redesign of the system, her participation included vertical gas well placement, pipeline sizing and location, head loss analysis with the use of KYGAS modeling software, and design report preparation and submittal. Furthermore, Ms. Jeter also developed the construction drawings and specifications for the first phase of the installation of the redesign of the gas collection and control system. Currently, Ms. Jeter manages the ongoing monitoring and maintenance of the gas system which is conducted by field personnel with Aquaterra. She has also worked closely with a third party and the Lee's Summit RRP on a carbon credit and gas to energy project at the facility.

Hydrogen Sulfide Emissions Projections, Timber Ridge Landfill: Ms. Jeter was the lead engineer on the project to assess the impacts of the acceptance of flue gas desulfurization (FGD) residue on the generation of hydrogen sulfide (H_2S) emissions which were contributing to offsite odor impacts. Tia utilized the SCS H_2S Projection Model, developed in conjunction with the University of New Hampshire, to prepare projections of H_2S emission from the landfill under varying FGD acceptance rates. The model was calibrated to actual landfill gas recovery and H_2S concentration data provided by the landfill with results projected over the next ten year period. The results of the emissions projections were used by Timber Ridge to evaluate how much FGD to allow for future disposal. Ms. Jeter also provided an assessment on the potential impacts to facility operations based on the continued acceptance of FGD residue, including requirements for enhanced gas collection and control and impacts to air permitting and compliance.

Horizontal Gas Collection Trench, Lee's Summit Resource Recovery Park: Ms. Jeter has been working with the Lee's Summit Resource Recovery Park (RRP) to address ongoing gas migration issues at the facility. Based on the results of a borehole evaluation that was conducted at the facility and managed by Ms. Jeter, it was concluded that the installation of a horizontal gas collection trench

was the next obvious step forward to address the gas migration. As such, Ms. Jeter provided engineering services related to the design of the trench and developed the construction drawings and specifications for the construction bid package. Following receipt of contractor bids, Ms. Jeter assisted the facility with reviewing bids and contractor selection. She also provided engineering support, and managed the construction quality assurance oversight of the trench during construction. Gas monitoring conducted following installation and startup of the trench indicates the trench effectively controls the gas migration with compliance at the perimeter gas monitoring probes.

Flare Performance Test, Courtney Ridge Landfill, LLC: Ms Jeter conducted performance testing oversight during the testing of a newly installed flare. The flare was tested to verify compliance with NSPS and local requirements.

Landfill Gas to Energy Project – Lafarge North America: Ms. Jeter participated in a project to utilize landfill gas as an alternative fuel at a cement processing plant. Her responsibilities included predicting the gas generation potential of the landfill, conducting an onsite evaluation of potential pipeline routes, performing the applicable head loss calculations to correctly size the pipeline and compression equipment and coordinating with the applicable regulatory agencies for installation of the pipeline. As part of the head loss analysis, Ms. Jeter utilized the modeling program KYGAS.

Tier 2 Sampling and Reporting, Casper Balefill: Ms. Jeter conducted landfill gas sampling and subsequent reporting in accordance with the Tier 2 testing and reporting requirements of NSPS for the facility. This included collection of landfill gas samples, calculation of site specific NMOC concentration and modeling with the use of Landfill Gas Emissions Model (LANDGEM) to determine NMOC emission rates for the facility.

Landfill Gas Services, Oak Grove Landfill: Ms. Jeter prepared the Tier 2 report as required by NSPS for the facility. This included calculation of site specific NMOC concentration and modeling with the use of Landfill Gas Emissions Model (LANDGEM) to determine NMOC emission rates for the facility. The results of the Tier 2 analysis indicated that the facility was required to install a gas system in accordance with NSPS requirements. The facility chose to contract with Aquaterra to design and permit an active gas extraction system. Ms. Jeter provided services including landfill gas generation calculations, vertical gas collection well design and placement, pipeline sizing, design report preparation and submittal. Furthermore, Ms. Jeter prepared the technical specifications and construction quality drawings for the first phase of the gas system construction. On an as-needed basis, Ms. Jeter also provide air compliance assistance services to the Oak Grove Landfill.

Alternative Tier 2 Testing and Analysis, Springfield Landfill: Ms. Jeter assisted with the Tier 2 testing and analysis conducted at the facility. Her involvement included the development and submittal of a request for approval of an alternative Tier 2 sampling protocol to the EPA region 7, which was approved. Ms. Jeter was also responsible for coordinating with the laboratory to organize the sample collection and analysis as well as preparing of and submitting the Tier 2 report as required by NSPS.

Tier 2 Testing, Columbia Landfill: Ms. Jeter participated in a project to conduct Tier 2 testing at the Columbia Landfill. Her involvement included coordinating summa canister shipment and gas analysis with the laboratory. Ms. Jeter also prepared the Tier 2 report including the calculation of site specific NMOC concentration and modeling with the use of LANDGEM to determine NMOC emission rates for the facility.

Tier 2 Testing, Wheatland Landfill, LLC: Ms. Jeter managed a project to conduct Tier 2 testing at the Wheatland Landfill. Her responsibilities included coordination of field personnel, sampling equipment, and laboratory canister receipt, shipment and analysis. Ms. Jeter also prepared the Tier

2 report including the calculation of site specific NMOC concentration and modeling with the use of LANDGEM to determine NMOC emission rates for the facility.

Other (Process Design)

Steam Optimization Project, Sabine River Works, Ethylene Unit – DuPont: Ms. Jeter conducted a project to optimize the use of steam at the process flare. Ms. Jeter evaluated the design of the steam system and detected three locations where inefficient use of steam was occurring. Through redesign of the steam system and implementation of the improvements, the project resulted in savings in excess of $200,000 per year.

Waste Water System, Sabine River Works, Ethylene Unit – DuPont: Ms. Jeter was responsible for the process engineering work associated with the operation and maintenance of the process waste water system. The system utilized a dissolved gas flotation unit, oil water separator and two steam strippers to treat the waste water to levels that met the land disposal restriction for benzene contaminated waste water. Part of her responsibilities included daily analysis of process data including temperature and pressure profiles to identify any irregularities in equipment operation, scheduling of maintenance activities including replacement of packing material or backwashing to reduce fouling, and overall system monitoring.

Renewable Fuel Standard 2, Third Party Verification Services, Western Plains Energy, LLC: Ms. Jeter performed the third party engineering review for the Western Plains Energy facility as required by the registration requirements outlined in 40 CFR §80.1450 of the Renewable Fuels Standard Regulation (RFS2). The purpose of the engineering review was to identify, evaluate, and verify the accuracy (and any discrepancies) of the information the renewable fuel producer submitted to EPA as part of their registration requirements. Ms. Jeter performed a site visit of the facility and reviewed all relevant documents related to the registration, capacity and history of the facility. A summary report of her findings and conclusions as to the accuracy of the facility's registration was prepared and provided to Western Plains for submittal to the EPA.