



## SAHIL BHARUCHA TECHNICAL MANAGER

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### CREDENTIALS

- ◆ B.S. Chemical Engineering, Virginia Polytechnic Institute and State University (Virginia Tech), 2018
- ◆ Licensed Professional Engineer (PE), Virginia

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### PROFESSIONAL EXPERIENCE

- ◆ 2023-Present: ALL4 LLC, Herndon, VA – Technical Manager
- ◆ 2022-2023: ALL4 LLC, Herndon, VA – Consulting Engineer
- ◆ 2019-2021: ALL4 LLC, Herndon, VA – Project Engineer
- ◆ 2018-2019: ALL4 LLC, Herndon, VA – Staff Engineer

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### TECHNICAL EXPERTISE

- ✓ State and Federal air permit programs including Title V, construction permit applications, and minor source permitting
- ✓ Air emissions inventories
- ✓ Emergency Planning Committee Right to Know Act (EPCRA) reporting
- ✓ Environmental compliance auditing
- ✓ Spill Prevention, Control, and Countermeasure (SPCC) Plans
- ✓ Aboveground storage tanks (AST) and underground storage tanks (UST) registration and compliance
- ✓ Annual/semiannual compliance and emissions reporting

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### PROFESSIONAL OVERVIEW

Mr. Sahil Bharucha graduated from Virginia Tech in May 2018 with a Bachelor of Science degree in Chemical Engineering. Mr. Bharucha's current role with ALL4 is Technical Manager, providing regular project management support in Clean Air Act (CAA) requirements, including air quality permitting and reporting. He has also worked on projects involving SPCC plan development and training, state storage tanks compliance, EPCRA reporting, and multi-media environmental auditing.

His air permitting experience includes Title V permit applications, construction permit applications, new/modified source permitting, and other State and Federal air permit programs. Mr. Bharucha's air compliance experience includes development and project management of emissions inventory tracking spreadsheets, auditing, and reporting. His air quality work routinely involves spark ignition and compression ignition reciprocating internal combustion engines (RICE) and fossil fuel-fired external combustion sources.

His storage tanks experience includes SPCC site evaluations, writing SPCC and state-specific oil pollution contingency plans, support with regulatory storage tanks inspections, and storage tanks compliance training.

In his role at ALL4, Mr. Bharucha has served on a variety of project teams, gaining experience in several industries, such as data centers, healthcare facilities, higher education institutes, power generation, and government facilities. Mr. Bharucha has experience working with clients across multiple states including Arizona, California, Illinois, Indiana, Iowa, Maryland, New Jersey, New Mexico, North Carolina, Pennsylvania, South Carolina, Texas, Virginia, and Washington, D.C.



## **AIR QUALITY PERMITTING EXPERIENCE**

Construction Permit/Operating Permit Applications, Multiple Clients: *Assisted in the development and/or project management of air permit applications for minor and synthetic minor sources. The project tasks included developing permitting strategies, performing Federal and state regulatory applicability analyses, preparing application narratives and forms, developing source-specific and facility-wide potential emissions calculations, and reviewing and commenting on draft permit conditions.*

Air Emissions Reporting, Multiple Clients: *Prepared air emissions reports including annual emissions inventories and air toxics inventories for facilities using state-specific reporting systems, U.S. EPA's Combined Air Emissions Reporting System (CAERS), and State and Local Emissions Inventory System (SLEIS).*

Title V Applications, Multiple Clients: *Assisted in the preparation of initial, renewal, and modifications to Title V Operating Permits. The project tasks included performing Federal state regulatory applicability analysis, preparing application narratives, forms, and facility-wide potential emissions calculations.*

Air Permit Compliance Reporting, Multiple Clients: *Prepared air reports including Title V Annual Compliance Certifications, semi-annual monitoring and deviation reports, 40 CFR Part 60 Standards of Performance for New Stationary Sources (NSPS) reports, 40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAP) reports, including use of U.S. EPA's Compliance and Emissions Data Reporting Interface (CEDRI).*

## **OTHER TYPES OF EXPERIENCE**

Multi-Media Environmental Compliance Audits, Multiple Clients: *Led audits to evaluate facility compliance with applicable environmental regulations. Primarily reviewed compliance with air quality, water quality, EPCRA, storage tanks, SPCC, and universal waste handling requirements.*

SPCC and State-Specific Oil Response Plan Preparation and Training, Multiple Clients: *Conducted SPCC site evaluations acting as the PE's agent or as the certifying PE at various types of facilities in multiple states, including examination of bulk storage containers and oil-filled operational equipment for compliance with secondary containment requirements. Developed initial SPCC plans, 5-year plan renewals, and technical SPCC plan amendments. Evaluated applicability of more stringent state and local oil storage regulations, including preparation of state-specific response plans. Prepared and presented facility specific SPCC training presentations to meet the Federal SPCC training requirement.*

EPCRA Reporting, Multiple Clients: *Prepared EPCRA Section 312 Tier II reports, Section 302/311 notifications, and Toxic Release Inventories (TRI).*



UST Compliance Gap Assessments, Multiple Clients: Conducted UST compliance gap assessments at various types of facilities. Examined UST systems for compliance with the 2015 revisions to 40 CFR Part 280 that have been implemented at the state level. Provided facilities guidance on required testing, inspections, and release detection recordkeeping requirements for dispensing, consumptive use, and emergency power generation UST systems.

#### **PUBLICATIONS/ PRESENTATIONS**

- “Clean Water Act: Hazardous Worst Case Discharge Planning; DEQ Aboveground Storage Tank Regulation Updates” Virginia EHS Conference Richmond, VA, September 19, 2024
- ALL4: 4 The Record Article – What to Know About Maryland’s New Storage Tank Regulations, July 2022
- ALL4: 4 The Record Article Series – State-Specific Considerations for SPCC Plans – author of Delaware, Florida, Maryland, New Jersey, New York, Pennsylvania, and Virginia editions, 2021-2022