



THERESE M. CULLEN

GLOBAL CLIENT DIRECTOR

CREDENTIALS

- ◆ JD, University of North Carolina, School of Law
- ◆ BS, Chemistry, Marketing (minor) - summa cum laude
- ◆ Air & Waste Management Association (AWMA)
- ◆ Chemistry Industry Council of Illinois (CICI)
- ◆ Licensed Attorney in Illinois

PROFESSIONAL EXPERIENCE

- ◆ 2025 – Present: ALL4 LLC, Chicago, IL – Global Client Director
- ◆ 2022 – 2024: Burns & McDonnell, Chicago, IL – Client Partnership/ Business Development Leader
- ◆ 2011 – 2022: Burns & McDonnell, Air Permitting/Compliance National Leader
- ◆ 2001 – 2011: Bradburne, Briller & Johnson, LLC Chicago, IL – Manager/Principal – Air Regulatory/Permitting/Compliance Group
- ◆ 1996 – 2001: Air Solutions, Inc. – Managing Principal

TECHNICAL EXPERTISE

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| ✓ Minor and major source air permitting | ✓ Emissions testing oversight and management |
| ✓ Local and federal air permitting | ✓ Environmental program recordkeeping |
| ✓ State and federal regulatory analyses | ✓ development and management |
| ✓ Client liaison for agency negotiation, settlement | ✓ Beneficial use/recycling program preparation and |
| ✓ Multi-media compliance review | implementation |

PROFESSIONAL OVERVIEW

Ms. Cullen has over 29 years of experience in the environmental field, with a main focus in the area of air pollution consulting, permitting and compliance issues. Her consulting and legal experience includes preparation and organization of permit documents and associated emissions and compliance data, development of compliance strategies, client liaison responsibilities for communicating and working with agency personnel at the state and federal levels, including negotiations with the Indiana Department of Environmental Management (IDEM), and effective implementation of emissions and environmental management programs designed to maintain facility and regulatory compliance. She also has prepared and organized several projects for material reuse/recycling and end use.

Ms. Cullen's experience includes various environmental statutes and regulations, including the Clean Air Act (CAA), the Clean Water Act, RCRA, CERCLA and EPCRA.



AIR QUALITY PERMITTING EXPERIENCE

General Permitting: Prepared numerous permit applications and supporting emissions calculations for industrial-based clients to address construction, operating and modification projects. State and federal regulatory requirements were addressed, as necessary, including review of potential applicability of Non-attainment New Source Review (NSR) and Prevention of Significant Deterioration (PSD) regulations. Potential and actual emissions scenarios were calculated and reviewed to request limitations which ensured maximum operational flexibility for various processes and ongoing facility compliance with applicable regulatory standards.

Permitting/Compliance – Major Source Construction – Midwest: Assisted in the development and preparation of permit application documentation and associated emissions calculations for construction of a major industrial coating source in the Chicagoland non-attainment area. The project included review and assessment of lowest achievable emissions rate (LAER) control technologies, preparation and completion of emissions modeling and the procurement of volatile organic material (VOM) emissions offsets as dictated under the NSR regulations. Review of hazardous air pollutants (HAPs) emissions and CAA Section 112g requirements was performed. Monitoring and recordkeeping strategies also were developed as part of this program.

Permitting/Compliance – Major Source Construction – East: Reviewed and prepared permit application documentation and associated emissions calculations for construction of a major petroleum retail source on the east coast. Project activities included control technology assessment, refinement of emissions calculations, development of site-specific operating parameters, and preparation of facility maintenance plans. Review of potentially applicable National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements and New Source Performance Standards (NSPS) was performed to assist in development of the necessary site-specific operating parameters and permit conditions. Review of hazardous air pollutants (HAPs) emissions and CAA Section 112g requirements also was performed.

Permitting/Compliance – Major Source Construction – Midwest: Client lead for project to obtain a PSD air permit for a new steel micro mill. Project included development and review of site- and process-specific emission factors and calculations, confirmation of regulatory applicability, and preparation of permit application documentation associated with the new facility. Air permit application project included development of permit application documentation, BACT analyses, emissions modeling and impacts analyses, and confirmation of state and federal requirements. Overall project also included supporting the client and facility in review, reporting and permitting of wetlands and endangered/threatened species, stormwater management and preparation of Stormwater Pollution Prevention Plan (SWPPP), civil engineering design for base facility construction, and overall liaison and communication responsibilities with state and federal regulatory authorities.



Permitting/Compliance – Major Source Construction – Midwest: *Ongoing environmental compliance and air permitting for a steel manufacturer. Completed facility emissions inventory, including combustion and process emissions associated operations using mass-balance and EPA-approved emissions estimating techniques. Developed emission factors for facility processes based on engineering estimates and industry standards. Conducted regulatory review of NSPS and NESHAP rules potentially applicable to steel manufacturing facilities. Assistance provided for environmental compliance support for facility operations, including regulatory applicability analysis, annual Tier II and Form R compliance reporting, review and update of oil storage and SPCC Plan, and guidance on SWPPP procedures.*

Permitting/Compliance – Midwest: *Project responsibilities have included environmental compliance and air permitting for a metals refining and manufacturing company. Completed on-going compliance requirements associated with facility's federally-enforceable state operating permit for air emissions. Assists facility with preparation of construction permits for new equipment. Conducted detailed regulatory review and summary of applicable NSPS and NESHAP rules. Provided environmental compliance support for facility operations, including annual Tier II and Form R compliance reporting, annual emissions reporting, and on-going compliance with regulatory and permit requirements.*

Permitting/Compliance – Construction – Various: *Prepared permit application documents and associated emissions calculations to address construction and installation of interim and final storage tanks for petroleum-based products for nationally-based client. Projects included emissions calculations, regulatory review and preparation of facility notifications and permit documentation. Review of potentially applicable NSR/PSD, NESHAP, NSPS and state-specific requirements was performed to ensure facility compliance.*

Permitting – Major Modification – Midwest: *Reviewed emissions testing results to develop appropriate actual and potential emissions scenarios for development of permit application documents for a major manufacturing facility modification. Project included preparation of project details to address CAA Section 112g requirements for process-specific HAPs emissions, as well as assessment of applicability of various NESHAPs standards. Project included ongoing interaction with agency personnel during draft permit negotiation and performance testing standard development.*

Permitting – Title V/CAAPP Permit – Midwest: *Assisted in the development and management of a Title V permit program which involved the inventorying of over one hundred separate sources, many of which could not be effectively addressed by emissions factors. Extensive research into operational modes was undertaken in order to determine what restrictions were practical and to develop ways of packaging emissions to create appropriate permit conditions and restrictions. Monitoring and recordkeeping strategies also were developed as part of this program*

Permitting – Title V/CAAPP Permit – Various: *Prepared extensive equipment inventories and designations for major sources for development of Title V permit applications. Project assistance included defining process sources and equipment categorization to streamline facility permit conditions and reporting obligations. Ongoing compliance and recordkeeping programs were established to assist with day-to-day facility operations, as well as with semi-annual and annual monitoring and compliance certifications and emissions notifications.*



OTHER TYPES OF EXPERIENCE

Compliance: Regulatory assistance was provided to address potential applicability of NESHAP requirements to large chemical production facility, including review of Synthetic Organic Chemical Manufacturing Industry (SOCMI) Hazardous Organic NESHAP (HON) and Miscellaneous Organic NESHAP (MON) rules. Inventories of process equipment and chemical storage tanks were developed to assist in regulatory review. Necessary notifications and ongoing compliance programs and documents were prepared to assist in timely submittals to state and federal agencies.

Compliance: Performed extensive research of numerous state and federal regulations to determine compliance for numerous Fortune-500 corporate clients within specific environmental statutory and regulatory provisions. Ongoing regulatory tracking and updates were provided to assist in facility and corporate compliance programs.

Data Assessment: Analytical coordinator for numerous industrial and environmental projects, which included responsibility for analytical data quality assessment and evaluation for such projects. Responsibilities included drafting and finalizing project reports and regulatory required documentation, as well as serving as Laboratory and USEPA Liaison for associated programs.

USEPA Test Methods: Organized and supervised on-site implementation of numerous USEPA, SW-846 and NIOSH air test methods at numerous industrial sources. Methods included USEPA methods 1 through 8, 10 through 13, 15 through 21, 24, 25, 25A, 26, 29, 101, 103, 201A and 202. Participated in and developed onsite implementation of both USEPA and nontraditional air testing protocols at numerous industrial sources.

Emission Monitoring: Hands-on and on-site experience with the operation and maintenance of numerous continuous emissions monitors, utilizing both extractive and dilution collection systems. Analyzers included hydrocarbon, nitrogen oxides, sulfur dioxide, carbon monoxide, oxygen, carbon dioxide, ammonia and hydrogen chloride. Managed and organized analytical staff and laboratory equipped to perform wet chemistry analysis of the above-mentioned methods. The laboratory also was equipped to perform gas chromatography, UV and IR spectrophotometry, and atomic absorption. Ms. Dorigan also supervised, organized and performed field analyses for many testing methods, including both wet chemistry and the instrumental procedures noted herein.

Settlements and Negotiations: Prepared and submitted required pleading documents regarding CAA interpretation and compliance for major corporate client in anticipation of settlement negotiations and meetings with USEPA representatives. Represented various industrial sectors in multiple agency negotiations involving air permit regulatory compliance disputes. Participated in CERCLA action involving over 5,000 potentially responsible parties (PRPs). Involvement included drafting and finalization of site Work Plan, Health and Safety Plan, and Administrative Order on Consent, as well as extensive communication with state agencies and USEPA in formulating site strategies and required remedial efforts and activities.