



ROBERT KUKLENTZ

Directing Consultant

CREDENTIALS

- ◆ B.S., Environmental Science, Drexel University, 1989

PROFESSIONAL EXPERIENCE

- ◆ 2010-Present: All4 LLC, Kimberton, PA – Directing Consultant
- ◆ 1993-2010: Dopaco Inc., Exton, PA – Environmental Manager
- ◆ 1994-2024: Chester County, PA HAZMAT Team, Deputy Chief
- ◆ 2005-2013: Bucks County Community College, Public Safety Training Institute, Adjunct Instructor
- ◆ 1989-1993: CRC Industries, Inc., Warminster, PA – Environmental Manager

TECHNICAL EXPERTISE

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| ✓ Federal and various state environmental regulations; | ✓ Refinery Sector Rule and Benzene Fenceline Monitoring |
| ✓ Landfill air permitting and compliance | ✓ Compliance auditing; |
| ✓ Extensive auditing experience of industrial facilities and RCRA TSDF's | ✓ Compliance monitoring techniques; |
| ✓ NESHAP and NSPS applicability and compliance | ✓ Air emissions inventory completion; |
| ✓ New/modified source air permitting (including PSD, Nonattainment New Source Review, Title V and Synthetic Minor); | ✓ Emergency Response Plan development and training; |
| ✓ VOC emission credit banking and trading; | ✓ Management of hazardous and non-hazardous waste streams in the US and Canada; |
| ✓ Management and administration of environmental software systems for compliance tracking; | ✓ Hazardous materials emergency response; and |
| ✓ Hazardous/non-hazardous/universal waste management | ✓ Management of remediation projects. |
| ✓ Industrial wastewater discharge permitting | ✓ Storage tank compliance. |
| ✓ Lead and manage governmental inspections and inquiries, | ✓ Tier II and TRI reporting |
| | ✓ NPDES permitting and management |
| | ✓ Air permit compliance – major and minor sources |

PROFESSIONAL OVERVIEW

Mr. Bob Kuklentz has 30 years of professional experience in multiple disciplines of environmental management in industry including 17 years in printing and packaging and 3 years in chemical specialties manufacturing. This includes all phases of industrial environmental management. He has worked in numerous states and Ontario, Canada.

In his role in the printing and packaging industry, Mr. Kuklentz was instrumental in the significant reduction of VOCs corporate-wide through the conversion to water-based printing inks, reduction or elimination of VOC containing cleaning solvents, improved management processes and procedures, and partnerships with key suppliers. These efforts helped to result in Mr. Kuklentz's employer being awarded the PADEP Southeast Regional Office's first Community Environmental Excellence Award and a Governor's Award for Environmental Excellence. In his consulting role at ALL4, Mr. Kuklentz has managed multiple large and complex new source review (NSR) air permitting strategy and application projects in several states. Several examples include the permitting of multiple combustion turbines in an ozone non-attainment area, permitting of numerous boilers and industrial processes, permitting of facility-wide modifications at petroleum refineries, and numerous projects in the printing industry. Mr. Kuklentz also extensive rule compliance and applicability experience including NESHAP's and NSPS. This experience spans a wide range of industries including pharmaceutical, refining and consumer products manufacturing.

Mr. Kuklentz also has extensive multimedia experience, including complex NPDES permitting, stormwater permitting, wastewater discharge sampling and permitting, and waste management.

Throughout all of his professional experience, Mr. Kuklentz has demonstrated his ability to recognize and implement innovative processes and procedures for the wide range of compliance issues facing industry.



AIR QUALITY EXPERIENCE

- Federally Enforceable State Operating Permit (FESOP), Illinois: Submission and management of a FESOP permit for a printing and packaging facility in Illinois. This included establishment of management procedures for compliance. This permit regulates VOC, NO_x, SO_x, PM₁₀, and Ammonia emissions.
- Air Permit Submission and Management, San Joaquin Valley Air Pollution Control District, California: Management of approximately 20 Permits to Operate (PTO), including submission of applications, management of Authorities to Construct (ATC), periodic modifications, and establishment of procedures for compliance with permit requirements for several facilities located in the San Joaquin Valley.
- Minor Source Permits, North Carolina: Submitted numerous source air permit applications for a minor source facility in North Carolina. This included development of management procedures for compliance with these permits. These permits regulated VOC and ammonia emissions.
- Air Permit Management, Ontario, Canada: Responsible for management of Certificates of Assurance (C of A's) for two manufacturing facilities in Ontario Canada
- Stack Testing: Managed stack testing for several projects in the printing and packaging industry. One such project was source testing project for Volatile Organic Compounds (VOC's) from a closed loop solvent parts washing system with inline distillation. Also managed stack testing projects for NO_x from dyers on two large printing presses in the San Joaquin Valley Air Management District.
- PSD Permit Application, Biomass-fired Boiler, Alabama: Participated in a project team to compile and submit a PSD permit application for a biomass fired boiler in Alabama. Led the BACT evaluation for this application.
- Major Source Permitting, Heavy Machinery Coating and Assembly, Pennsylvania: Managed a project that included development and submittal of an air permit application for the installation of coating lines and fabrication preparation equipment for a large heavy machinery manufacturer.
- Environmental Compliance Support, Shipbuilding Operations: Managed environmental compliance projects at a large shipbuilding operation. Projects included determination of HAP and VOC emissions from coatings, environmental reporting, and agency interaction.
- Major Source Permitting, Combustion Turbine: Managed a project that included development and submittal of an air permit application for the installation of a combustion turbine at a major source. Managed the project from original inception (strategy phase) through installation and startup, including management of CEMS-related support.

AUDITING EXPERIENCE

Conducted many industry facility multimedia compliance audits and assessments. In 2020-2021, conducted over 20 complex site assessments at large facilities for a Fortune 100 company.

Audited many TSDFs in the U.S. and Canada on a rotating basis.



DATA MANAGEMENT EXPERIENCE

Environmental Management Software Solutions: *Managed the implementation of two separate environmental management software systems. This included participating in the vendor selection, budget management, configuring the software, developing and delivering training, and managing all other parts of the implementation. In both cases the projects were highly successful in providing the desired results. Examples of the positive outcomes of these projects include improved compliance monitoring, improved reporting capabilities, automation of data entry, and improved visibility to upper management.*

REPORTING EXPERIENCE

Air Related Reporting:

- Air Emission Inventories in many different jurisdictions
- Superfund Amendments and Reauthorization Act (SARA) reporting:
 - SARA 312 Tier II Reporting
 - SARA 313 Form R Toxic Release Inventory Reporting
- National Pollutant Release Inventory (Canada) and Ontario Ministry of the Environment (MOE) Reporting
- Notification and compliance reporting through U.S. EPA's Compliance and Emissions Data Reporting Interface (CEDRI)