



## Sheryl Watkins, P.E. SENIOR TECHNICAL MANAGER

---

### CREDENTIALS

- ◆ B.S. Chemical Engineering, Georgia Institute of Technology, 1988
- ◆ Registered Professional Engineer (FL, LA, SC, and WV)
- ◆ National Council for Air and Stream Improvement (NCASI) Southern Regional Committee

---

### PROFESSIONAL EXPERIENCE

- ◆ 2019 – Present: ALL4 LLC, Atlanta, GA – Senior Technical Manager
- ◆ 2015 – 2019: AECOM - Senior Project Manager
- ◆ 1999 – 2015: URS Corporation – Senior Engineer
- ◆ 1988 – 1998: Radian International – Staff Engineer

---

### TECHNICAL EXPERTISE

- |  |  |
|--|--|
| ✓ State and Federal air quality and permitting programs including PSD, NSPS, NESHAP, CAM and Title V | ✓ Assisting industrial clients in developing compliance strategies for new applicable requirements                         |
| ✓ New/modified source air permitting   | ✓ Performing air pollution control technology evaluations and applications   |
| ✓ Minor & major source air permitting  | ✓ Title V and Permit Application Development   |
| ✓ Environmental compliance strategy  | ✓ Providing senior-level air quality expertise to the pulp and paper, wood products, and chemical manufacturing industries |
| ✓ Routine compliance/permit reporting  | ✓ EPCRA Tier II and TRI Form R reporting   |
| ✓ Air emissions inventories (Criteria, air toxics, GHG)  |  |
| ✓ Air quality compliance auditing  |  |

---

### PROFESSIONAL OVERVIEW

*Sheryl is a Senior Technical Manager at ALL4 providing senior-level air quality expertise internally and externally primarily in the pulp and paper, wood products, and chemical manufacturing industries.*

*Sheryl has over 37 years of experience in air quality consulting, including air permitting, reporting, compliance, and/or air auditing experience in over fifteen states. Her experience is in various manufacturing industries developing permit applications for compliance with prevention of significant deterioration (PSD), Title V/Synthetic Minor/True Minor Operating Permits, new source performance standards (NSPS), and national emission standards for hazardous air pollutants (NESHAP). Sheryl has also served as lead air quality auditor for over 25 manufacturing facilities.*

*Sheryl's new source review (NSR) and Title V experience includes numerous major projects in the pulp and paper, wood products, and chemical manufacturing industries. Development of these applications includes experience in estimating air emissions, best available control technology (BACT), ambient air quality analyses, and state and federal regulatory applicability analyses. Additional air permitting experience has been in the aerospace, oil and natural gas, petrochemical, hazardous waste incineration, lime manufacturing, ammunition, packaging, secondary aluminum, and boat manufacturing industries.*

*During her professional experience, Sheryl has managed numerous projects for the implementation of NSPS, NESHAP, and Title V programs including preparation of continuous monitoring system (CMS) quality assurance/quality control (QA/QC), compliance assurance monitoring (CAM), and emissions minimization plans. These activities included evaluation of compliance options, permit application development, permit negotiation, recordkeeping/reporting system implementation and management, environmental/operations personnel training, and auditing.*



**Sheryl Watkins, P.E.**  
**SENIOR TECHNICAL MANAGER**

*Florida experience includes preparation of air construction, operating permit revision, and operating permit renewal applications, reporting support (annual operating report, TRI, source obligation reports, Semi-annual monitoring reports, NSPS and NESHAP excess emission reports, Title V certification), 3rd party auditing (air quality), compliance support, permit negotiation with the Florida Department of Environmental Protection (FDEP) (headquarters and districts), and onsite support for a pulp and paper mill.*

**AIR QUALITY PERMITTING EXPERIENCE OVERVIEW**

Synthetic Minor/Minor Source Applications, Various: Project Manager or technical support for several synthetic minor/minor source permitting efforts in AL, FL, LA, MS, OH, SC, NM, and TX for the pulp and paper, box plant, wood products, chemical, and medical/medical waste industries. Involved potential-to-emit and/or emission increase calculations and detailed regulatory analyses.

PSD Permit Applications, Various: Project Manager or technical support for PSD permit applications at several bleached and unbleached pulp and paper mills in AL, FL, GA, LA, MS, MI, NC, SC, and TX. Projects included project emission increase calculations, netting calculations, BACT, PSD modeling, and toxics modeling.

Title V Applications, Various: Project Manager or technical support for preparation of multiple Title V and Title V Renewal Permit applications since 1995 for bleached and unbleached paper mills in AL, AR, FL, GA, LA, MS, NC, SC, and TX, since 2010 for chemical manufacturing facilities in FL, and medical/medical waste facilities in FL and LA.

Regulatory Compliance Applications: Prepared permit applications for Equivalency by Permit (EBP) approaches (alternate maximum achievable control technology (MACT) compliance approaches) for several pulp and paper mills. Wrote draft permit language for MACT and EBP requirements.

**AIR QUALITY SELECTED PERMITTING EXPERIENCE**

*PSD Permit Application, Pulp and Paper Facility in AL, Project Manager: Project manager for a PSD project in Alabama that involved BACT analyses for a package boiler and paper machines. Ambient air quality modeling was performed for PM10, CO, SO2, and NOx. Ozone and toxic impacts were evaluated.*

*PSD Permit Application, Pulp and Paper Facility in LA, Project Manager: Project manager for a complex PSD project in Louisiana that involved BACT analyses for a lime kiln, digesters, evaporators, brownstock washers, pulp tanks, and paper machines. Ambient air quality modeling was performed for PM10, PM2.5, and NOx. Emissions evaluation and testing were performed for all sources of PM10 and PM2.5 to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS).*

*Title V Operating Renewal, Organic Chemical Facility, Project Manager: Project Manager for the preparation of a Title V Operating Permit application for renewal. The project effort included an on-site verification of the emissions unit inventory, review of applicable and non-applicable requirements (including evaluation of*



*NSPS and NESHAP regulations), permit streamlining, and permit modifications to improve organization and clarity. The project was a collaborative effort involving plant and corporate staff.*

*Construction Permit Applications, Organic Chemical Facility, PSD Avoidance, Project Manager: Project Manager for the preparation of two PSD avoidance Construction Permit applications for both a new chemical plant and an expansion of an existing chemical plant at an existing facility. The project efforts included an emissions inventory for the new chemical line, emissions increase calculations, review of applicable and non-applicable requirements (including evaluation of NSPS and NESHAP regulations), documentation that the two projects were separate under PSD, and development of a PSD tracker.*

#### **OTHER TYPES OF EXPERIENCE – TECHNICAL SUPPORT**

Technical support to American Forest and Paper Association. Development/assessment of background information to support the Plywood and Composite Wood Products (PCWP) maximum achievable control technology (MACT) II rulemaking development and residual risk for “round 1” sources effort, including development of work practices for lumber kilns and several other sources identified on the list of remanded units.

Technical support to American Forest and Paper Association and Pulp/Paper Companies. Provided regulatory support for the Pulp & Paper NESHAP Subpart S residual risk technology review, including rule summary and initial list of technical issues, collaboration with others on risk modeling and reviewing emissions and release point data.

Technical support to Pulp and Paper Facilities. Coordination and completion of the 3-phase ICR for multiple bleached and unbleached pulp and paper Mills for a large forest products corporation. Was responsible for developing a project plan and detailed timeline and coordination with corporate contacts and other consulting companies to establish guidelines for consistency and accuracy in survey completion.

Technical support to EPA. Project Director and support engineer to gather technical background information on the pulp and paper industry in support of the pulp and paper NESHAP rule. Work involved the following: tours of approximately 12 pulp and/or paper facilities, development of “model” facilities, control technology review for treatment of pulping vents and condensates and bleaching vents, and support for air and liquid sampling at approximately 6 facilities. Information collected was presented in the background information document (BID) for the pulp and paper industry.



**OTHER TYPES OF EXPERIENCE – COMPLIANCE AND REPORTING EXPERIENCE**

- Project Manager for supporting several pulp and paper mills with compliance and permitting activities for existing and new sources under the pulp and paper NESHAP Subparts S and MM (non-combustion and combustion sources). Work included preparation of an alternate monitoring request, compliance plans, air test and condensate sampling plans, and test reports.
- Project Manager for supporting several pulp and paper mills with compliance and permitting activities for existing and new boilers under the Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP (known as Boiler MACT). Work included preparation of an alternate monitoring request, compliance plans, air test and fuel sampling plans, and test reports.
- Project Manager and developer for preparation of TRI threshold calculations and reporting for seven pulp and paper mills over the past 10 years. Senior reviewer for multiple other TRI threshold calculations and/or reports in more recent years, with a focus on the forest products and chemical manufacturing facilities.
- Part of 3rd party environmental auditing team for fifteen integrated pulp and paper mills (Alabama, Arkansas, Georgia, Florida, Louisiana, North Carolina, South Carolina, Tennessee, and Virginia). Focus was air quality.
- Lead auditor for multi-media environmental auditing team for three thermomechanical/newsprint and two recycle pulp and paper mills (Georgia, Mississippi, Michigan, West Virginia, and Washington). Focus was air quality.
- Lead Title V permit auditor for a facility in Louisiana that included the following processes: Nitrogen Plant, Ammonia Plant, Phosphoric Acid Plant, and a Sulfuric Acid Plant.
- Part of 3rd party environmental auditing team for two Phosphoric acid/Fertilizer facilities (Florida and North Carolina). Focus was air quality.
- Part of 3rd party environmental auditing team for two chemical complexes (Florida and Ohio). Focus was air quality.
- Part of 3rd party environmental auditing team for one mining facility (Arkansas). Focus was air quality.
- Part of 3rd party environmental auditing team for one polymeric coating facility (Connecticut). Focus was air quality.
- Title V annual compliance certifications and tools and multimedia environmental compliance management tools for several pulp and paper facilities.



**Sheryl Watkins, P.E.**  
**SENIOR TECHNICAL MANAGER**

- Project manager for preparation of annual air emission inventories and annual toxic release inventories for 5 facilities in LA, SC, and MS.
- Onsite experience with a pulp and paper company for a six-month period for two to four days a week. Responsibilities included all activities to ensure compliance with Title V air permit. Performed daily tasks to ensure facility compliance with the Title V permit requirements, including preparation of immediate reports to the state. Also supported the Mill in compliance with waste segregation and collection and documentation of waste tracking/manifests, restructuring the filing system, review of draft air permits, response to audit items, monthly visual inspections of vent and condensate lines under NESHAP Subpart S, annual air testing support, and calibration and preventative maintenance tracking for monitors and air pollution control equipment. In addition, helped train new employee on air quality duties.

TRAINING WORKSHOPS

- ALL4 Air Quality Training (AQ101) – “Air Pollutants”, “Emissions Calculations, Inventories, and Reporting”, “NESHAP”, and “New Source Review (NSR) – The Other NSR Components”. Co-presenter with Lindsey Kroos, for the period 2020-2025
- Live Webcast – “Emergency Planning and Community Right-to-Know Act (EPCRA) Section 313 Toxic Release Inventory (TRI)”, April 2022, April 2023, and April 2024
- Internal Trainings – “Chemicals Industry Session 1 – Processes Controls, and Emissions Calculations”, co-presenter with Andrew Kelley; “TRI Reporting – Deep Dive”, co-presenter with Colleen Nagel; “Introduction to Pulp and Paper Regulations”, co-presenter with Caleb Fetner; “Introduction to Pulp and Paper Processes”, “WATER9 Air Emissions Model”

***PUBLICATIONS/ PRESENTATIONS***

- National Council for Air and Stream Improvement (NCASI) 2021 Conference – “Collaboration: The Key to a Successful Permitting Project”, part of the NCASI Mill Experience Panel, October 2021
- National Council for Air and Stream Improvement (NCASI) 2020 Conference – “Title V Operating Permit Renewals”. Co-presenter with Derek Sain and Lee Carlson, NCASI, October 2020
- NCASI Eastern Regional Meeting – “Air Pollution Control Device Fundamentals – Operations and Regulatory Requirements”. Co-presenter with Derek Sain and Lee Carlson, NCASI, June 2018
- NCASI Eastern Regional Meeting – “A Primer on Permitting for a Capacity Expansion with a Focus on PM<sub>2.5</sub>”. Co-presenter with Chuck Doyno and Colin McCall, June 2017