



## CHRISTINA LYNCH MANAGING CONSULTANT

---

### CREDENTIALS

- ◆ *B.S., Environmental Engineering, Drexel University, 2012*
- ◆ *Air & Waste Management Association (AWMA)*
- ◆ *Professional Engineer in Pennsylvania, Virginia, Texas, Iowa*

---

### PROFESSIONAL EXPERIENCE

- ◆ *2011 – 2012: Pennoni Associates, Philadelphia, PA – Staff Engineer*
- ◆ *2012 – Present: ALL4 LLC., Kimberton, PA – Business Unit Leader*

---

### TECHNICAL EXPERTISE

*The following highlight Ms. Lynch's key areas of technical expertise:*

- 
- |                                                                                                       |                                                                           |
|-------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| ✓ <i>State and Federal air permit programs including Title V and construction permit applications</i> | ✓ <i>Best Available Technology (BAT) Analysis;</i>                        |
| ✓ <i>Air Quality Compliance Strategies and Programs</i>                                               | ✓ <i>Emissions Tracking and Reporting Tools</i>                           |
| ✓ <i>Air Program Management</i>                                                                       | ✓ <i>Emission Credit Reduction (ERC) Analysis</i>                         |
| ✓ <i>NSR/PSD Permit Support</i>                                                                       | ✓ <i>Spill Prevention, Control, and Countermeasure (SPCC) Plans</i>       |
| ✓ <i>Facility Aggregation</i>                                                                         | ✓ <i>Proficiency in several state air permitting programs</i>             |
| ✓ <i>Air Quality Compliance Strategies and Programs</i>                                               | ✓ <i>Non-Hazardous Secondary Materials (NHSM) Non-Waste Determination</i> |
| ✓ <i>Technical and advocacy support to industry associations</i>                                      | ✓ <i>Greenhouse Gas permitting and reporting</i>                          |
- 

---

### PROFESSIONAL OVERVIEW

*Ms. Christina Lynch is the Philadelphia Business Unit Leader with experience in air quality consulting, including permitting and ongoing compliance. She has prepared and managed the development of state construction permit applications, New Source Review (NSR) applications, Title V permit applications, emissions inventories and annual emissions statements, greenhouse gas (GHG) reporting, and annual and semi-annual compliance reporting. In addition, Ms. Lynch has also developed and managed Spill Prevention, Control, and Countermeasure (SPCC) Plans and Non-Hazardous Secondary Materials (NHSM) Non-Waste Determinations.*

*Ms. Lynch has participated on a number of project teams, dealing with industries including lead-acid battery manufacturing, food processing industries, sterilization, pulp and paper mills, cement manufacturing, landfill and waste management sites, and power generation, as well as several different states including Pennsylvania, New York, Florida, California, New Jersey, Ohio, Wisconsin, Missouri, Texas, California, and Iowa.*

---



## **PROJECT HISTORY**

### **AIR QUALITY PERMITTING EXPERIENCE**

Title V Operating Permit Renewal Applications, Managing Consultant: Assisted in the preparation of renewal applications for Pennsylvania (Battery Manufacturing, Medical Device Manufacturing, Beverage/Tobacco Manufacturing, Consumer Products), Ohio and Wisconsin (Consumer Products), and Louisiana (Hospital Medical Waste Incinerator).

Construction Permit/Plan Approval Applications, Managing Consultant: Assisted in the preparation of a construction permit/ plan approval applications for various facilities in Pennsylvania (Battery Manufacturing, Beverage/Tobacco Manufacturing, and Power), Michigan (Power), Iowa (Battery Manufacturing), Texas (Battery Manufacturing), Ohio and Wisconsin (Consumer Products), and Florida (Medical Device Manufacturing).

Permit Exemptions and Requests for Determination (RFDs), Managing Consultant: Assisted in the development and submittal of Permit Exemptions and RFDs in Pennsylvania (Battery Manufacturing, Medical Device Manufacturing, Beverage/Tobacco Manufacturing, and Electric Component Manufacturing), Wisconsin (Consumer Products), and Ohio (Beverage/Tobacco Manufacturing and Consumer Products).

Emission Reduction Credits (ERCs), Multiple Clients, Managing Consultant: Assisted in researching and acquiring ERCs in Pennsylvania and New York (Battery Manufacturing, Beverage/Tobacco Manufacturing, and Power).

Significant Permit Modifications: Assisted in the development and submittal of Significant Permit Modifications in Pennsylvania (Battery Manufacturing).

Trainings: Prepared and conducted staff trainings on the importance of contacting EH&S staff and consultants before implementing process changes (Medical Device Manufacturing and Beverage/Tobacco Manufacturing), Pennsylvania air permitting and timelines (Medical Device Manufacturing and Beverage/Tobacco Manufacturing), and internal company-wide trainings regarding baseline determinations, BACT determinations, and RACT 2.

Industry Support: Technical support to the Association of Battery Recyclers (ABR) evaluating comments on the NESHAP for Secondary Lead Smelting (Subpart X) ICR for submittal to EPA. Provided support to ABR by developing technical comments related to the proposed Standards of Performance for Secondary Lead Smelters (i.e., proposed revised 40 CFR Part 60, Subpart L and proposed new 40 CFR Part 60, Subpart La).

### **AIR QUALITY COMPLIANCE EXPERIENCE**

Annual/Semi-annual Compliance Reports, Managing Consultant: Prepared annual and semi-annual compliance reports regarding applicable regulations for facilities in Pennsylvania (Battery Manufacturing, Medical Device Manufacturing, Beverage/Tobacco Manufacturing), Ohio and Wisconsin (Consumer Products), Iowa (Battery Manufacturing), and Florida (Battery Manufacturing and Food Manufacturing).

### **AIR QUALITY REPORTING EXPERIENCE**

Annual Emissions Statements, Managing Consultant: Prepared annual emissions statements for facilities in Pennsylvania (Battery Manufacturing, Medical Device Manufacturing, Beverage/Tobacco Manufacturing), Ohio and Wisconsin (Consumer Products), Iowa (Battery Manufacturing), and Florida (Battery Manufacturing and Food Manufacturing).

Toxic Release Inventory (TRI) Reporting: Prepared TRI reporting tools and Form R's to comply with annual regulations for facilities in Pennsylvania (Beverage/Tobacco Manufacturing and Pharmaceutical).



### MISCELLANEOUS REPORTING EXPERIENCE

EHS Plans and Planning, Managing Consultant: Assisted in preparing Spill Prevention Control and Countermeasures (SPCC) Plans and Emergency Response Plans in Pennsylvania and Virginia.

Non-Hazardous Secondary Materials (NHSM) Non-Waste Determination: Assisted clients with the preparation of a categorical exemption petition under 40 CFR Part 241.4 for the railroad industry. The exemption petition involved working with several trade associations and developing the necessary legitimacy criteria document to allow the use of railroad ties to be used by combustion sources for energy recovery without triggering the emission standards under the Commercial and Industrial Solid Waste Incinerator (CISWI) rules.

Non-Hazardous Secondary Materials (NHSM) Self-Implementing Non-Waste Determination: Assisted with the preparation of a NHSM non-waste determination for an alternate fuel vendor. As part of the project, it was necessary to arrange for analytical data to be developed and then demonstrate that the components to the alternate fuel were processed, had significant heat value, were managed as a valuable commodity, and had contaminant levels comparable to traditional fuels. The NHSM was submitted to U.S. EPA and a request was made to obtain a comfort letter regarding the non-waste status of the alternate fuel.

Develop an Assessment Tool for Non-Hazardous Secondary Materials (NHSM) Non-Waste Determinations, Confidential Client: Developed an Excel-based assessment tool for making a determination that a NHSM could/could not qualify as a non-waste. The tool was developed for environmental staff or fuel purchasing individuals to make a preliminary determination whether a potential alternate fuel had the necessary data to support a non-waste determination per the requirements of 40 CFR Part 241.3.

### MULTIMEDIA AND REGULATORY TRACKING EXPERIENCE

Multimedia Environmental Regulatory Review Service, Multiple Clients: Served as technical staff for multiple jurisdictions for ALL4's multimedia environmental regulatory review service. Tasked with summarizing current pertinent client-specific multimedia environmental events (e.g., final regulations, proposed regulations) on a Federal and state- by- state basis by addressing the citation name and code, date of action, action type and summary of regulatory action. Reports are provided monthly to clients. Staff members review regulatory data, summarize data as applicable to clients and enter data into report format.