

STATEMENT OF QUALIFICATIONS

ENVIRONMENTAL CONSULTING SERVICES



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EARTH CONSULTING, LTD.**

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1.0 INTRODUCTION

EARTH Consulting, Ltd. (ECL) offers high quality environmental consulting services at reasonable costs. ECL founder and president, Fraser K. Hamilton, PG, has 20 years of consulting experience, including several years as regional manager for one of the largest consultants in the world. He brings the commitment to quality, technical expertise and the delivery system clients expect and deserve without the layers of cost and time that come with the management burden at larger firms.

He started his career as lead field technician developing sampling methods for volatile and semi volatile organic compounds on petroleum refinery land farms. Since then he has taken positions of increasing responsibility, from managing field projects to managing branch offices and regional businesses. During this time, his technical expertise has also grown. ECL relies on a network of experienced affiliates locally and nationwide to meet unique technical needs.

Some of the services that ECL offers include:

- Environmental Site Assessments (Phase I/II), Transaction Screening Audits and ODOT Environmental Screening Assessments
- Underground Storage Tank management/closure/assessment/remediation
- Soil and groundwater assessment and remediation
- Permitting
- Hazardous material and environmental emergency response
- Indoor air quality
- Environmental Compliance



A discussion of these services and our approach to project management and execution follows.

2.0 QUALITY

ECL is committed to providing the highest quality services and advice. We maintain a current understanding of the regulatory process and developments as well as new and emerging technologies. We understand when application of these developments and/or technologies is appropriate, and we make recommendations consistent with the regulatory processes that

make sense. When subcontractors are required for services outside ECL’s expertise, only qualified, experienced and reputable contractors will be used. All work products will be subjected to a rigorous review process.

3.0 DELIVERY SYSTEM

We recognize that in most cases the only indication that ECL has been at a site is the written report that we deliver. Not only is this product a reflection on ECL, but it is also a reflection on you, the client and your choice of consultant. Therefore, ECL strives to deliver a work product that is timely, accurate, well-written and professional in appearance. To that end, we also maintain a policy of under promising and over delivering. ***By setting realistic expectations at the start of the project we try to avoid disappointment and by delivering ahead of schedule we will try to surprise.***

ECL will always offer reports in hard copy and/or electronic versions. Hard copy reports are bound and will contain boring logs, laboratory reports, database reports, photographs and figures in color, as appropriate. Electronic reports will be delivered as Adobe® PDF files. Electronic reports will include all the same attachments as the hard copy, all in color.

4.0 SERVICES

ECL offers a full range of environmental consulting services. As mentioned elsewhere, if a task is beyond our technical expertise we will let the client know. However, through our network of professionals, we can usually get any job done.

Environmental Site Assessments (Phase I/II) – ECL Phase I ESAs exceed the ASTM standard. We



Whether it be getting a difficult tank out of the ground or remediating a release, ECL can help.

have never used inexperienced field people to do the site reconnaissance on a Phase I ESA. This makes it easy for us to meet the US EPA All Appropriate Inquiry (AAI) and ASTM E1527-05 standard for environmental professionals. Our work has been accepted by the SBA as well as almost all banks.

We have experience at a variety of types of facilities. From residential developments to 800 acre soybean fields to 100+ acre industrial sites, we understand the processes that result in environmental impact! We will bring all our experience to every project.

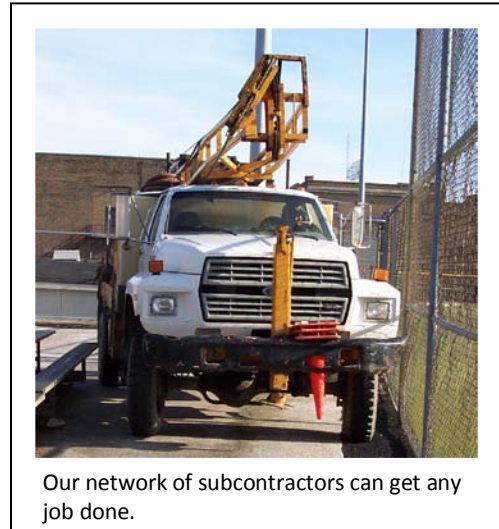
Underground Storage Tank management/closure/assessment/remediation – Our

experience ranges from cleaning up a residential basement and surrounding soils after a release from a UST filled with heating oil to a million dollar remediation project at a high profile shopping mall. We understand the regulatory process and will challenge the regulators to come up with the most cost effective investigative and/or remedial approach while ensuring that human health and the environment are protected.

We also help owners with day-to-day management of their UST systems. We can handle everything from annual permitting and testing scheduling, etc. to setting up a system for the owner to do it efficiently. We know the systems, contractors and regulations.

Soil and groundwater assessment and remediation –

ECL can mobilize drill rigs, GeoProbes®, hand augers or whatever other technology may be appropriate to get the samples to properly characterize a site. We can lay out a grid, drill enough holes and collect adequate soil and/or groundwater samples to characterize site conditions at a corner gas station in less than a day. We can also use the results of a Phase I ESA at a complex site to design an investigation that we know is cheaper than many of our competitors while still getting the data needed to make meaningful decisions about risk exposure or even remediation costs.



Our network of subcontractors can get any job done.

Permitting – Environmental permitting is about reading and understanding the regulations, negotiating with the regulators and understanding the client’s needs. These are all strengths of ECL. We know that some of our reports and permit application submitted to regulatory agencies get passed around as examples of how it should be done. Many regulators will accept our reports electronically and provide comments on those submittals without going through a process of letter writing.

Hazardous Material and Environmental Emergency Response – ECL has assembled a network of contractors and consultants to respond to environmental emergencies whether it is in a warehouse, factory, over-the-road, or at a remote site. We particularly welcome the challenge of responding to remote sites, such as wireless communications facilities. The difference between calling ECL and a contractor is the project management. We offer professional project management services and documentation that will help you get quick response from your insurer and the regulatory agency. And our project management charges will likely be less than those of a contractor.

SPCC Plans – New SPCC regulations allow facilities in many circumstances to self certify SPCC plans. ECL will help you identify problem spots, sources and possible preventative measures or we will write the SPCC plan for you to self-certify. We can also help with the required training.

Environmental Compliance – Whether you own a corner gas station or a foundry, ECL can review your operations and identify areas where there might regulatory non compliance. We can then help develop an action plan and be there to help with implementation. This service becomes more critical as businesses try to comply with standards such as ISO 14000.

These are just some of the services that ECL offers. We have helped clients with landfill investigations and permitting, constructed and installed secondary containment and alarm

systems around generators and even helped clean out mobile generator fuel tanks between concerts.

5.0 SUMMARY OF EXPERIENCE

ECL has provided a variety of services to its clients. These services have ranged from the assessment of environmental conditions at a closed landfill, to collection, analysis and interpretation of samples at an operating gasoline station. Following is more specific information regarding ECL's corporate experience, as well as the personal experience of ECL personnel.

ECL Experience

Client	Project	Description
City of Westlake	Waterline contamination	ECL received a call that during the installation of a waterline a strong gasoline odor was noted in the trench. ECL sampled the impacted material, arranged and managed disposal and provided the City a report. We then identified the responsible party and obtained 100% reimbursement for the City.
Oakwood Village, OH (Chagrin Valley Engineers)	UST closure	ECL performed an after the fact closure at 10 year old closed UST site. An NFA was obtained within two months of our initial engagement. Services included soil and groundwater sampling as well as reporting and agency negotiation.
City of Westlake	UST Closure	This "after the fact" UST closure was performed to satisfy the regulator and the client's proposed construction. Work involved a soil and groundwater assessment followed by removal of approximately 100 tons on impacted soil, 30,000 gallons of contaminated groundwater and a small quantity of free product.
Confidential Aluminum Foundry	TRI reporting and Environmental Compliance	ECL was retained to review chemical usage over the previous year to evaluate TRI reporting needs. We developed a system that summarized TRI chemicals and usage and calculated reporting needs based on review of MSDSs and purchase orders. In addition, we performed an environmental compliance assessment to evaluate regulatory needs with regards to universal wastes, SPCC, air, RCRA waste management and other regulatory items.
Disaster-Pro	Mold assessment and indoor air quality	A private home owner reported that his slab on grade hardwood floor had buckled and that there was evidence of mold growth on the underlying concrete. ECL performed a thorough assessment of the home to identify other areas of mold growth, collected samples for microbiological analysis and evaluated possible sources of water intrusion. This included evaluation of wall cavities using a remote camera. In the end large areas of wall as well as the hardwood floor were removed and we made recommendations for regrading the site in conjunction with structural and civil engineers.

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ECL	Experience	(continued)
Confidential Industrial Site	SPCC Plan	ECL developed a site-specific SPCC plan for a 21 acre industrial site in an urban area in Lorain County Ohio. The plan included an assessment of potential oil sources (transformer, AST and drum storage area) and potential receptors. The resultant plan included steps to be taken to reduce the likelihood of a release to the environment.
Municipality	Explosive Gas Monitoring Plan Implementation	ECL implemented an Ohio EPA approved explosive gas monitoring plan that included the installation of 13 explosive gas monitoring wells. The wells were capped with custom caps to allow for monitoring of accumulated gases as needed. We also provided instruction to the client and the local regulatory authority on sampling methods.
Kranauer BP	BUSTR Tier Evaluation	During the course of a Phase I ESA, ECL identified an open release incident resultant from a 10 year old release from a UST system. The property owner contracted ECL to do whatever was needed to obtain a No Further Action letter in as quick and as cost-effective manner as possible. ECL performed some preliminary investigatory activities to assess relative nature and extent of impact and proceeded with a dig and haul program. Within 90 days of breaking ground ECL had completed the remediation and assessment activities required by BUSTR's 2005 rules and received a NFA from BUSTR.
Various clients	Phase I ESAs	ECL routinely performs Phase I ESAs. Firm experience has included 800 acre farms to 120,000 square foot warehouses to apartment buildings. We have also worked at automotive assembly plants, petroleum refineries and other complex industrial settings. These services are performed to comply with client requirements and/or ASTM standards.
Confidential Clients	Phase I ESA/NEPA Section 106	ECL performs, as a subcontractor, Phase I ESA, NEPA and SHPO evaluations as part of wireless communications tower build out throughout Northeast and Central Ohio and western Pennsylvania. Nearly 100 of these evaluations have been performed since the summer of 2003.
Swift Filter	Phase I ESA	ECL performed a Phase I ESA at a 10,000 square foot flex space building in Oakwood Village, Ohio. The building was occupied by an ink formulator and was also in use for auto detailing and storage. An area of barren soil was determined to have an exceptionally low pH during a subsequent Phase II ESA.
US Bank	Transaction Screen	ECL performed a Transaction Screen Assessment on an Ashtabula County apartment complex on short notice to meet a lender's deadlines. No RECs were identified.
Mr. Timothy Rowe	Phase II ESA – UST site Cost reimbursement	Mr. Rowe owns (or has interest in) several parcels of real estate on Cleveland's west side. These properties were originally developed as gasoline stations, and though underground storage tanks have been removed, potential buyers have raised concerns regarding residual impact from past operations. ECL performed Phase II ESAs at two sites to assess residual impact associated with the former gasoline USTs systems (tanks, lines, dispensers, etc.) and waste oil USTs. In both instances ECL was successful in assisting the owner receive closure and remediation assistance from the former operators.

ECL	Experience	(continued)
Munson Corners Sunoco	Free Product Recovery	ECL is assisting this client with Free Product Recovery (FPR) at their operating gas station. Services include assessing potential sources for the LNAPL. In addition, ECL is performing a forensic investigation to determine the responsible party for the FPH.
City of Westlake, Ohio	Landfill consulting	Mr. Hamilton has obtained several authorizations from the Ohio EPA to allow the City of Westlake to complete construction projects and make modifications on top of their closed landfill. In addition, ECL performs semiannual groundwater monitoring at the Site.
Confidential Client	HazMat Emergency Response	ECL manages a hazmat and environmental emergency response service throughout North America. Besides providing a single point of contact for personnel at multiple facilities, we also provide round the clock response services to over the road or in plant emergencies.
Maple Heights, OH (Chagrin Valley Engineers)	Vibration Monitoring	ECL was retained as a sub consultant to monitor vibrations caused by passing rail traffic as well as Intermodal loading and unloading operations, particularly as these suspect vibrations might affect residential structures. The monitoring results were compared to published standards.
Case Western Reserve University	Pre-demolition hazardous materials specification	ECL prepared a specification defining procedures to be used in the predemolition assessment of a closed hospital.
Confidential Client	Emergency generator secondary containment	The client is concerned that a breach of a line or other fueling system component above ground could result in a loss of diesel fuel to the environment (it happened once). Because of site restrictions, secondary containment of only 110 gallons could be constructed. The system is fueled from a 1,000 gallon UST. Therefore, ECL is installing the 110 gallons of secondary containment and a hydrocarbon only sensor that will be tied into the control room for this national networking hub. If the sensor detects hydrocarbons it will make a series of phone calls before shutting itself and the generator down.
Entertainment Services	Mobile generator cleanout/ Project Management	ECL received a call requesting help in cleaning fouled diesel fuel from a mobile generator fuel tank. The generators were enroute from Detroit (at the NBA Finals) to Pittsburgh (to power a Jimmy Buffett concert) when the call was received. ECL identified a means to get the job done and had the generators serviced and operational within 48 hours (including a nearly 24 hour delivery delay) of receiving the call for help.

Personal Experience – Fraser Hamilton

In addition to this corporate experience, Mr. Hamilton has personal experience on a variety of projects, including:

Project Type	Client	Description
Litigation	US Department of Justice	Managed the preparation of an expert report. Scope of work included compilation and editing of text from various technical experts while working closely with DOJ attorneys. Other tasks included writing text for soil and regulatory portion of the report, preparation of demonstrative exhibits and management of data.
	Geotechnical Engineering Consultant	Was retained to provide expert testimony regarding geological conditions and interpretation by counsel for a geotechnical consultant. Case was settled prior to trial.
Due Diligence	National Health Care Conglomerate	This Nashville-based health care company was acquiring a hospital in eastern Indiana and requested that a Phase I ESA and asbestos assessment be performed. The results of the Phase I ESA suggested the presence of USTs, asbestos and other environmental conditions at the multi-site campus. A Phase II ESA was performed to better assess and understand potential environmental liabilities.
	The Home Depot	Mr. Hamilton managed the assessment of several large properties for a national retailer specializing in home improvement products. The work was performed at vacant sites as well as previously developed sites. Work included not only typical Phase I ESA requirements, but also assessment, quantification and cost estimate for the abatement and remediation of all hazardous materials at developed this site. This often required mobilization of a crew to assess asbestos, lead-based paint, mercury switches and fluorescent lamps and ballasts.
	Janus	Mr. Hamilton managed and performed a Phase I ESA on a site selected for development as an office campus for a financial services firm in Denver Colorado. The site was located on the grounds of a former United States Air Force Base being converted to civilian uses. Site conditions were considered unsuitable when it was discovered that demolition activities at the site had included infilling of foundations with asbestos containing materials.
Groundwater	Confidential Utility	Mr. Hamilton managed the assessment of groundwater resources at a proposed site for a new peak power generating station in western Ohio. Project included locating, drilling and testing deep groundwater production wells at the proposed site.
	Confidential Pulp and Paper Mill	Mr. Hamilton directed a groundwater assessment as part of a permit for a new landfill at a pulp and paper mill on the Mississippi River. Based on results of the assessment, a monitoring well network was installed.

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Project Type	Client	(continued)
Underground Storage Tanks	JC Penney	Mr. Hamilton managed the fast-track closure of a UST system at a suburban Louisville shopping center. During closure it was discovered that a release had occurred resulting in a several acre plume of contaminated soil and groundwater. A remedy was developed, tested and implemented in less than 12 months. This included installation of 137 two-phase vacuum extraction wells, half of which were in the foundation of a new department store. The entire project was performed with the approval of the regulators.
	Hertz Rent-a-Car	Managed the closure and remediation of USTs at Cleveland Hopkins International Airport. Project was originally contracted by the Airport to a demolition contractor. Mr. Hamilton was requested to respond in less than an hour to assess closure activities. Based on contractor inexperience, Mr. Hamilton was requested to manage all subsequent closure activities.
	Coastal	Mr. Hamilton managed the assessment and remediation of releases at several sites in the mid-south for a national gasoline retailer. Work included assessment of soil and groundwater contamination, development of remedial action plans, pilot testing and remedial implementation after regulatory negotiation.
Landfills	LWD	Mr. Hamilton designed an investigatory program to assess potential sources of reported groundwater impact at a landfill in western Kentucky. Groundwater aquifer properties were assessed. The study was successful in demonstrating to the Commonwealth of Kentucky that the landfill was not the source of certain compounds detected in groundwater samples.
	Marshall County Landfill	Mr. Hamilton directed the assessment of groundwater conditions, and preliminary design of remedial strategies for a closed county solid waste landfill.

Mr. Hamilton was also one of the primary authors of the Preliminary Geotechnical Assessment for the Euclid Corridor Improvement Project. He directed the field investigation and data gathering steps of the project. In addition, he contributed to some parts of the report. Mr. Hamilton also directed the assessment of subsurface vaults and other structures along the Euclid Avenue corridor through downtown Cleveland.

It is ECL's goal to apply best current industry practices, as well as the requirements of any applicable guidance to all work completed. And, common sense will be used in interpreting results.

6.0 SERVICE

ECL is committed to meeting the needs of its clients. To that end, we make the following commitments:

- We will not take on work that we cannot complete within the deadlines that our clients have.
- We will not commit to work that is outside of our expertise.
- We will return phone calls, email, etc. in a timely manner and respond to the needs of our clients as quickly as possible
- We will try to under promise and over deliver, rather than over promise and under deliver!
- We will make a point of understanding our client's goals and expectations and then try to exceed them whenever possible
- We will perform all work in a safe manner
- We will employ cost-effective and technically sound methods

7.0 TECHNOLOGY

ECL is committed to using the latest technology to the best advantage for our clients. To this end field personnel are typically equipped with cell phones (with text message and email capability), PDAs and/or laptops, digital cameras and GPS equipment. Our reports can be published and delivered in paper format or as electronic deliverables in PDF format.

7.0 CERTIFICATIONS

ECL has been prequalified by the Ohio Department of Transportation (ODOT) to perform environmental services, including ESA Screening, Phase I and II ESAs. We are also currently certified as a Small Business Enterprise by Cuyahoga County, Ohio. This certification recognizes ECL's status as a small business and our qualifications to provide environmental consulting services. The firm is also approved by several regional banks for due diligence services. Mr. Hamilton is also a licensed professional geologist in Kentucky.

8.0 REFERENCES

Good referrals and reputation are a cornerstone of ECL's marketing strategy. It is a primary goal of ECL to develop and maintain a reputation for responsiveness, excellence and value. You are encouraged to contact any or all of the following references:

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