



Professional Profile

Mark A. Torf

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FIELDS OF EXPERTISE

- Air, Water and Waste Permits
- Contaminated Site Restoration
- Due Diligence/Property Transfer
- Environmental Compliance Auditing
- Emergency Spill Response and Planning
- Lead Pollution
- Multimedia Sampling
- Pollution Prevention & Waste Minimization
- Risk Assessment
- Management Consulting
- Toxic Release Planning and Reporting

EXPERIENCE SUMMARY

Thirty five years experience studying, managing and resolving environmental and hazardous material problems.

Mark Torf has been the Sr. Professional of TORF Environmental Management for 26 years. Mr. Torf has managed and completed more than 600 projects for more than 250 clients. He manages industrial and environmental compliance audits, contamination assessments, waste related cleanup projects and obtains permits for private sector and government clients. Mr. Torf has prepared expert opinions and testified in civil enforcement actions and has experience assisting clients in criminal enforcement matters. In addition, he is the Training Manager for the company's EPA-Accredited Lead Paint Renovator Training Program. More than 200 students have been trained and certified.

Managed Boise Geoscience Group for Dames & Moore, Inc., an international consulting engineering firm. Provided senior level corporate representation; responsible for senior technical project oversight, budgets, marketing consulting services, office management, employee hiring, supervision and training.

Compliance and Permits Manager for the State of Idaho hazardous waste and radiation control program. Directed state-wide environmental permitting and enforcement policies, forecasted program needs, prepared budgets and served as Department liaison and consultant to other states, agencies, organizations and media. Responsible for developing and negotiating State/Federal program commitments, negotiating compliance and penalties with regulated parties, staff development and oversight.

Additional Experience Summary

Senior Hazardous Material Specialist for the State of Idaho hazardous waste program. Performed inspections and permit reviews throughout Idaho. Duties included monitoring air, water, and soil for hazardous constituents; providing technical guidance and oversight on special problems; assessing compliance and developing enforcement actions.

Senior Water Quality Specialist for the State of Idaho water quality program. Responsible for water quality studies at mining sites and recommending enforcement action. Work included placer, surface and underground mines. Monitored large public and small community drinking water systems, groundwater contamination investigations, monitoring municipal and industrial discharges. Reviewed and commented on Environmental Impact Statements, hydroelectric siting proposals, and stream alteration applications.

Technical Support Chemist for the State of Ohio EPA Office of Emergency Response. Lead responder and investigator for chemical spills throughout Ohio. Managed Ohio EPA/USEPA PCB Enforcement Program. Directly responded to hundreds of spills and coordinated activities for more than a thousand. Responded on a 24-hour basis, investigated complaints, constructed emergency containment, performed sampling, designed and supervised remedial actions, and prepared legal enforcement actions.

Water Quality Specialist for the Mid-Ohio Regional Planning Commission. Designed and implemented a biological sampling program along the Olentangy River in central Ohio. Placed and retrieved artificial substrate samplers, identified and counted macro invertebrates, calculated species diversity indices, and prepared a technical report

KEY CREDENTIALS

- Certified Hazardous Materials Manager, Institute of Hazardous Materials Management, No. 3285
- Academy of Hazardous Material Professionals, Member
- EPA Hazardous Materials Incident Response
- EPA-Certified Lead-Based Paint Inspector
- EPA-Certified Lead-Based Paint Risk Assessor
- OSHA 29 CFR 1910.120 Hazardous Waste Training
- OSHA 29 CFR 1910.120 Advanced Hazardous Waste Safety for Managers and Supervisors
- OSHA 10-hour General Industry Standards
- B.S. Natural Resources, University of Michigan, 1979

KEY PROJECTS**Permitting and Compliance**

- Managed and achieved an Air Permit for a large State University. The project challenges included a large number emission sources, many types of pollutant emissions, and limited air dispersion.
- Managed an air emissions inventory and an application for Permit to Construct for truck trailer manufacturer. The Permit included flexible provisions for future changes.
- Developed an air emissions inventory and an application for Permit to Construct for an industrial door painting facility. The project focused on estimating emissions of toxic and hazardous air pollutant emissions.
- Assisted precision metal machine shop respond to violations of industrial waste water pretreatment Permit. The project included meeting with regulatory officials, waste water sampling and development of written plans and compliance monitoring requirements.
- Managed Air Quality Permit to Construct application for a used oil processor. The project included reviewing emission calculations, air dispersion modeling, and developing proposed permit limitations.
- Managed Air Quality Permit to Construct application for a metal coatings shop. The project included emission estimating, air dispersion modeling, and developing permit limitations and compliance monitoring requirements.
- Assisted fiberglass composite manufacturer in developing and implementing an Air Quality Permit to Construct for its new facility. The project included emission estimating and air dispersion modeling.
- Managed development of a Petroleum Spill Prevention Control Countermeasure Plan (SPCC) for large Residential and Recreation Development, including ski and golf-related maintenance facilities.
- Developed an Accidental Spill Prevention Plan for a dairy product blending and packaging plant.
- Managed development of an Air Quality Operating Permit (Tier II) for a semiconductor manufacturer.
- Renewed Air Quality Operating Permit (Tier II) for a semiconductor manufacturer.
- Prepared an air pollutant emissions inventory and permit applicability determination for a semiconductor equipment manufacturer.
- Evaluated storm-water discharge permitting requirements for a pesticide manufacturing and formulation facility.
- Project Manager and lead consultant for evaluation of toxic air emissions and hygiene standard compliance at a metal coating and plating facility.
- Prepared an air emission inventory and evaluated permitting requirements for new emergency generators at an integrated circuit manufacturing facility.
- Prepared Hazardous Materials Technical Opinion report in support of building permit application for a large metal fabrication shop.
- Developed an air emissions inventory and an application for Permit to Construct for a metal coating shop. The project focused on emission of toxic and hazardous air pollutant emissions from anodizing and electro polishing processes.
- Developed an air emissions inventory and an application for Permit to Construct for an inflatable boat manufacturer. The project focused on estimating emissions of toxic and hazardous air pollutant emissions.
- Project Manager and lead consultant for development of an air toxic permit application for a RCRA-permitted hazardous waste storage facility.
- Developed many chemical release inventory reports (SARA 313) for several industry sectors and manufacturers, including integrated circuit, metal fabrication and metal coatings. Consulted on report development for an explosives manufacturer. Reviewed, evaluated and developed reports describing toxic chemical use, emissions and discharges. Provided compliance related guidance.
- Directed joint State of Idaho and federal EPA Part B permitting of a commercial hazardous waste treatment, storage and disposal (landfill) facility.
- Managed State of Idaho-portion of a joint State of Idaho and federal EPA groundwater technical enforcement investigation team at a hazardous waste landfill.
- Authored first RCRA closure and treatment permit in Idaho. Performed facility assessment, directed public participation program, negotiated permit provisions, and drafted the permit for a closed utility pole treatment facility.
- Surveyed large public and small community drinking water systems for compliance with state regulations. Activities included collecting water samples,

KEY PROJECTS CONT.

evaluating operation and maintenance and identifying possible cross-connections with non-potable supplies.

Cleanup and Restoration

- Evaluated a historic mine waste impoundment and negotiated remedial measures plan in advance of prospective regulatory enforcement action.
- Managed successful Superfund site "delisting" project concerning soil and groundwater perchloroethylene contamination at a metal coatings facility amidst a large industrial park. The project included documenting site conditions, evaluating site-specific health and environmental risks, and negotiating regulatory approvals for site closure.
- Performed emergency characterization, repackaging and transportation of materials at an uncontrolled hazardous waste site.
- Characterized soil and groundwater at a former pesticide applicator site. Project included negotiation of cleanup levels for chlorinated pesticides and petroleum contaminants using risk assessment methodology. Developed Corrective Action Plan, supervised soil removal and conducted soil and groundwater monitoring.
- Sampled and analyzed soil at diesel fuel spill, advised client (seller), and satisfied prospective purchaser of large agricultural chemical sales facility.
- Assisted a municipal police department in assessing and remediating lead contamination from a historic indoor firing range.
- Supervised cleanup of a petroleum spill that discharged into a creek at a mountain recreational resort. Provided technical advice and assisted with regulatory and media communications.
- Characterized accumulated tank and container wastes at a bankrupt used oil collection and re-refining facility. The site included over 25 tanks with capacities including 10,000, 25,000 and 100,000 gallons, as well as more than 350 drums and containers. Performed sampling, regular pollution prevention surveys, and soil contamination investigation.
- Managed monitoring of contaminated groundwater at a large computer products manufacturing site. Completed tasks included regulatory agency negotiation, monitoring plan development, cleanup standard negotiation, soil and groundwater monitoring.
- Multi-phase investigation at a large vehicle maintenance facility, resulting in identification of historical oily wastewater discharges into a subsurface disposal system. Project included negotiation of cleanup levels for volatile and semi-volatile petroleum contaminants using risk assessment methodology.
- Sampled soil, monitored air and evaluated proposed methods to cleanup fuel oil contamination from throughout a residential structure.
- Supervised removal of petroleum underground storage tanks at downtown city-core location. Managed remediation and removal of previously closed tanks, evaluated soils for hydrocarbon contamination, characterized tank residuals and excavated soils for disposal, and supervised transportation of wastes to a hazardous waste disposal facility.
- Supervised remote sensing and sampling project at an U.S. Army Corps of Engineers multi-tank jet fuel underground storage tank facility containing buried 25,000-gallon tanks.
- Project Manager and lead consultant for chemical waste inventory, repackaging and disposal planning project. The project involved over 125 containers of unmarked, diverse wastes from industrial wood lamination processing and production facility.
- Supervised emergency on-scene response to a truck accident involving a fungicide spilled into the Little Salmon River, Idaho.
- ARAR Analysis for a CERCLA feasibility study of contaminated soil and groundwater at the Idaho National Engineering Laboratory.
- Review and analysis of a study of contaminated soil and groundwater at the Idaho National Engineering Laboratory.
- Supervised emergency response at a release of 5,000 gallons of acetone at a rubber tire manufacturing plant.
- Directed on-site response to a train derailment involving release of 20,000 gallons of toluene diisocyanate.
- Personnel safety and monitoring support at an uncontrolled waste site containing more than 30,000 barrels and tanks of hazardous waste.
- Supervised emergency response and installation and operation of activated carbon and enhanced bacterial treatment of contaminated groundwater caused by a train derailment involving hydrogen cyanide and acrylonitrile.

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- Lead technical investigator in Ohio for PCBs in natural gas transmission lines. Investigations focused on management of PCB laden condensates generated during operation of interstate transmission lines.

Litigation Consulting

- Advised and provided and technical assistance to legal counsel for used oil processing company responding to regulatory enforcement action. Developed work plans, sampled and analyzed waste and interpreted regulatory requirements.
- Provided expert opinion in wrongful death litigation involving a solid waste landfill.
- Provided litigation-support and technical services in litigation involving storm water management and potential contaminant releases at a scrap metal salvage yard. Developed work plan, negotiated regulatory agency agreements, performed storm water monitoring, and prepared technical reports.
- Provided litigation-support and technical services in criminal litigation involving management of hazardous waste and potential contaminant releases at an ammunition recycling and manufacturing facility. Negotiated regulatory agency agreements, arranged sample analyses and provided recommendation to attain regulatory compliance.
- Provided advice and technical assistance to legal counsel for a paint manufacturing company defending itself from hazardous waste-related criminal environmental enforcement. The project included waste characterization, waste management, site remediation, and a Ninth Circuit US Court of Appeals decision protecting the confidentiality of project records.
- Provided litigation-support and technical services in litigation involving petroleum contamination at a vehicle salvage yard. Developed work plan, negotiated regulatory agreements and performed soil and waste container sampling.
- Provided advice and expert opinion in litigation involving petroleum cleanup.
- Provided advice and technical assistance to legal counsel and their potential defendant in a radioactive materials storage and transportation-related criminal environmental enforcement investigation.
- Provided litigation-support to legal counsel and technical services to the owner of vehicle maintenance shop defending itself from hazardous waste-related criminal environmental enforcement investigations.
- Provided advice, air quality dispersion modeling and technical assistance in support of a citizens' suit to require emissions reporting at a large dairy Idaho. The work was used in recent development of state-wide air quality permitting thresholds for the Idaho dairy industry.
- Provided expert witness services in litigation involving alleged exposure and adverse health effects from a transportation related PCB oil release.
- Provided advice and technical services for the Idaho Attorney General regarding potential criminal and administrative hazardous waste management violations at a State-owned laboratory.
- Provided litigation-support services to legal counsel in litigation involving exposure and adverse health effects from pathological E. Coliform bacteria contamination of a public drinking water system.
- Provided litigation-support and technical services to legal counsel in litigation involving petroleum groundwater contamination from underground fuel tanks.
- Consulted and provided research to legal counsel in a dispute regarding pesticide registration and use.
- Provided litigation-support and technical services to legal counsel for a large secondary lead manufacturing facility, responding to a citizen suit alleging violations of toxic emissions reporting and Community Right to Know laws.
- Provided advice and technical assistance to legal counsel and a State Insurance Fund, with lead paint and asbestos issues in response to lawsuit involving a church property.
- Assisted a residential homeowner and their legal counsel following a heating oil spill in a residence. Reviewed technical reports, remediation plans and depositions, negotiated additional hygiene protection and mitigation activities, and supported other litigation activities.
- Provided advice and technical assistance to legal counsel reviewing adequacy of a client's cleanup of soil and groundwater contamination by petroleum products. Recommended measures necessary to respond to anticipated regulatory agency concern and enable transfer of the real property.
- Performed third-party review for legal counsel and their client of soil petroleum contamination

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- discovered during construction at a former vehicle maintenance facility. Project included determining appropriate cleanup levels for volatile and semi-volatile petroleum contaminants using risk assessment methodology. Project resulted in cessation of planned treatment system and "no further action" determination by regulatory agency.
- Reviewed and evaluated litigation related testimony, documents and correspondence involved in a civil suit regarding petroleum underground storage tank leak and cleanup.
 - Provided advice and technical assistance to legal counsel for a property owner's review and challenge of a proposed Conditional Use Permit modification for the expansion of a neighboring commercial solid waste composting facility.
 - Provided advice and technical assistance to legal counsel and their litigation involving toxic exposure to a contractor working at an industrial park.
 - Provided litigation-support and technical services for legal counsel and their client following a heating oil spill in a residence. Monitored soil and foundation for contamination beneath the home, developed remediation plans, and prepared for litigation.
 - Provided litigation-support and technical services to legal counsel and their client, a large steel fabrication shop, responding to a federal order and monetary penalty regarding toxic emissions reporting (SARA 313). Assisted the company and trained key personnel immediately prior to regulatory inspection. Enforcement consulting included reviewing and improving proposed agreements, successfully negotiating alternatives to monetary penalties, and implementing technical aspects of the enforcement agreement.
 - Advised a metal coating facility in advance of an EPA toxic emissions reporting inspection (SARA 313). Assisted the company and trained key personnel immediately prior to regulatory inspection. Enforcement consulting included reviewing historical release reports and developing revised reports for submission during regulatory inspection.
 - Provided advice and consultation to a semiconductor manufacturer regarding toxic emissions reporting (SARA 313) following EPA enforcement. Assisted key company personnel in estimating releases at a large, complex, manufacturing facility and developing a complete and accurate toxic release report.
 - Provided litigation-support and technical services to Idaho Attorney General and their client, State Board of Correction, including negotiating a cleanup order, landfill and groundwater contamination investigation, and monetary penalty. Reviewed and improved proposed consent agreements, provided advice concerning regulatory enforcement procedures, negotiated scope of the technical investigation and cleanup standards, and conducted the investigation.
 - Technical analysis of radioactive and hazardous waste management issues for the Idaho Attorney General. Interpreted data, developed reports and exhibits, and prepared for litigation.
 - Lead technical investigator for criminal enforcement action involving PCB disposal in Ohio. Assisted U.S. Department of Justice with case development and testified in complex criminal trial involving five defendants.

Environmental Audit and Assessment

- Completed an environmental regulatory compliance audit for the sale of a precision metal machining site. The audit assessed compliance with air, water and waste management requirements.
- All Appropriate Inquiry (Phase 1) Assessment at a 700-acre site that included disposal of agricultural waste and several historical dairy and hog-related facilities.
- Environmental Regulatory Compliance Audit at a semi-conductor equipment service company. The audit scope included solid and hazardous waste, petroleum spill prevention, hazardous material Community Right to Know, emergency response planning, industrial waste water treatment, drinking water supply, storm water discharge, and air emissions.
- All Appropriate Inquiry (Phase 1) Assessment at a 1,300-acre remote farming site. The Assessment identified previously unknown paint-related waste and debris.
- All Appropriate Inquiry (Phase 1) Assessment at 2 closed semiconductor manufacturing facilities.
- Phase 1 Assessment and Regulatory Compliance Assessment at a fishing line manufacturing facility. Provided advice and technical services to the Purchaser.
- Phase 1 and Phase 2 Assessment at a former vehicle repair facility, near extensive historic groundwater petroleum contamination at an urban downtown

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- site.
- Developed and conducted a regulatory compliance audit at a State-owned laboratory for the Idaho Attorney General.
- Performed third-party technical adequacy-reviews of several Environmental Property Assessment Reports for a major commercial Bank. The reviews were stimulated by indications of potential soil and groundwater contamination that had been discounted.
- Expert opinion report concerning a disputed Phase 1 Property Assessment at several large vehicle maintenance facilities.
- Managed a Phase 2 Property Transaction Assessment at a Weiser, Idaho wood products manufacturing facility. The project included soil and groundwater monitoring related to historical glue and paint waste management practices.
- Conducting lead-based paint inspections and risk assessments at residential and commercial structures. Monitor levels of lead in paint, dust, soil and water; evaluate exposure risks and recommend corrective actions, if necessary.
- Pre-purchase environmental property assessment for a 65,000 acre parcel of remote land in northern Idaho. The assessment was successfully completed within an extremely short deadline and met federal hazardous substance due diligence requirements.
- Conducted a pre-purchase compliance liabilities audit at a semiconductor manufacturing facility. The audit included underground storage tanks, hazardous waste management, waste water pretreatment, potential CERCLA liabilities and SARA Title III, including toxic chemical release reporting and other Community Right to Know requirements.
- Conducted a pre-purchase compliance liabilities audit at an integrated circuit manufacturing facility. The audit included underground storage tanks, hazardous waste management, waste water pretreatment, potential CERCLA liabilities and SARA Title III, including toxic chemical release reporting and other Community Right to Know requirements.
- Environmental compliance audit at Idaho's only commercial hazardous waste disposal facility. The audit included all TSCA (PCB) and RCRA (hazardous waste) aspects of site operations, including land ban compliance, personnel training, cover, contingency planning, waste characterization and groundwater monitoring.
- Conducted occupational safety, hygiene and environmental compliance audit at a semiconductor component cleaning service company. Results were used for regulatory compliance demonstration and prospective client safety/purchasing audits.
- Pre-purchase property assessment at a wood products mill and wood treatment facility. The project focused on drinking water systems and possible cross connections, UST removal oversight and hazardous material management practices.
- Monitored a private drinking water system, groundwater and surface water in response to discharges from a neighboring feedlot and dairy.
- Local Project Coordinator and lead investigator for a comprehensive environmental compliance audit of all Boise (Idaho) City facilities and operations. Scope of the audit included Water Quality; Air Quality; Wastewater Discharge; Wastewater Pretreatment; Hazardous Waste Management; Superfund; Emergency Planning; Community Right to Know; Pesticide Use, Application and Management; Hazardous Materials Transportation; Toxic Substances; and Occupational Safety and Health.
- Performed multi-tank assessment for a large semiconductor facility. Identified areas of noncompliance. Reviewed adequacy and recommended changes in the consulting engineer's tank integrity evaluation.
- Environmental compliance consulting at State of Idaho correctional facilities. The audit, conducted in anticipation of regulatory inspection, included training, identification of possible violations and resolution of compliance problems, and assistance during inspection.
- Project Manager for hazardous waste characterization at the State of Idaho's correctional facilities. Project includes hazardous waste related enforcement consulting, project management, and waste management plan development.
- Project Manager and lead investigator for regulatory compliance audit at a metal plating shop. The audit included hazardous waste management, Toxic Release Inventory Reporting, and Community Right to Know.
- Senior consultant during a property transfer environmental assessment for the creditor committee overseeing reorganization of an international automotive parts manufacturer. Project sites were distributed among six states and included both warehouses and manufacturing facilities.
- Pre-purchase property assessment for a major public utility. Project site included a recreational development and publicly owned highway.