

***Environmental
Management
& Compliance
Services***

T. Cozzie Consulting, Inc.

www.tcozzie.com

Environmental Management and Compliance



T. Cozzie Consulting, Inc., is a professional consulting firm with expertise in a variety of disciplines including environmental science, hydrology, environmental engineering, industrial services and database programming. The company was formed in 1997 to provide environmental services to petrochemical and manufacturing industries, lending institutions, attorneys, agricultural concerns and engineering firms.

The company maintains its headquarters in Boca Raton, Florida, with a satellite in Atlanta, Georgia. We offer our full range of services primarily in the Southeastern US and along the Gulf and Atlantic coasts from Texas to New England. **T. Cozzie Consulting** also assists clients worldwide, and has responded to environmental opportunities in Europe, the Caribbean, and Central and South America.

T. Cozzie Consulting maintains general and professional liability insurance coverage, as well as pollution prevention coverage. Additional assurances can be obtained if needed to warrant your confidence in our professional capabilities.

We provide discreet, personalized services related to industrial compliance issues; air, wastewater and other environmental permitting; toxic and hazardous materials; pollution prevention; environmental site assessment, risk analysis, and cleanup. We can assist you in developing an ISO 14001 Environmental Management System for your organization or facility. In addition, we offer innovative methods to aid clients in managing their environmental, health and safety affairs, including network-based compliance management systems.



Please call us at (561) 338-6304 or dial toll-free in the U.S., (877) 338-6304, for immediate assistance with your environmental compliance, liability or management issues. Or, we invite you to visit us at our internet address, www.tcozzie.com.

Regulatory Compliance and Permitting

T. Cozzie Consulting offers extensive knowledge and expertise in environmental compliance requirements at Federal, State and local levels. Depending on the needs of the Client, we can provide rapid response to immediate compliance issues; continuous assistance with meeting environmental program goals; even turn-key management of your environmental affairs. Please contact us for discreet, expert assistance with:

- Facility Compliance Evaluations
- Title V Air Operating Permit Applications
- Industrial Wastewater Discharge Permitting
- Pollution Prevention and Waste Minimization
- Hazardous Materials Management
- Waste Characterization and Management
- Hazardous Waste TSD Facility Audits
- Worker and Community Right-to-Know Programs
- Spill Prevention, Control and Emergency Response Planning
- Groundwater and Surface Water Monitoring Programs
- Compliance Monitoring, Reporting and Recordkeeping



ISO 14001 Environmental Management Systems

T. Cozzie Consulting is assisting manufacturing clients with development of Environmental Management Systems in conformance with the ISO 14001 Standard. We believe that implementation of an Environmental Management System will be a critical competitive advantage, particularly for companies engaged in international business. Its other advantages include more efficient means to ensure compliance with applicable regulations; cost savings through pollution prevention and waste minimization programs developed using the EMS process; improved relations with employees and the community; and in many cases, a more positive relationship with regulators.

Our services include assistance with EMS development, drafting of implementation procedures, and identification of environmental impacts associated with your facility and operations. We also provide conformance and pre-certification audits and program gap analysis.

Virtual Environmental, Health & Safety Manager

Virtual Environmental, Health & Safety Manager provides professional support for a broad range of health, environmental and safety management and compliance activities. It offers an effective alternative for organizations that may lack the resources to maintain full-time, dedicated HES staff, or that frequently require specialized environmental and industrial hygiene expertise in support of the in-house HES team.

This program combines professional consulting with development and maintenance of an *electronic (PC or network and internet-based) data management system* to schedule, track and record compliance management activities. The database system is customized according to the specific needs and activities of the organization or facility.

Consulting support for covered activities includes data management; compliance tracking, evaluation and guidance; review and monitoring of applicable regulatory and other requirements; "hot line" response to compliance queries; assistance with report and document preparation; representation in proceedings involving regulatory agencies; as well as communication of requirements and activities to management and other parties.

Program services may include the following specific provisions:

- *Site visits*, generally twice yearly, for compliance evaluation, information and training or other purposes. The timing of these visits will be at the Client's discretion.
- *Meetings with regulatory agency personnel*, as needed to address non-compliance issues that arise after entry of the consulting contract.
- Ongoing support for *environmental management system* development and implementation in accordance with the ISO 14001 standard (excluding certification audits or review).

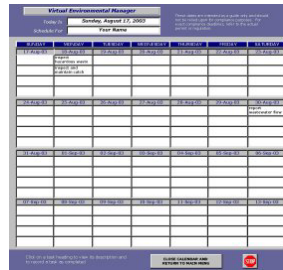
The program does not include collection and laboratory analysis of environmental samples. The contract does not cover operation and maintenance of remedial equipment, or preparation of documents associated with contamination assessment or remedial activities. The contract does not cover preparation of applications for initial permits or substantial modifications to existing permits. The program does not include representation before regulatory agencies in proceedings involving non-compliance issues that pre-date the contract. These services that are not covered by the contract may be performed under separate agreements.



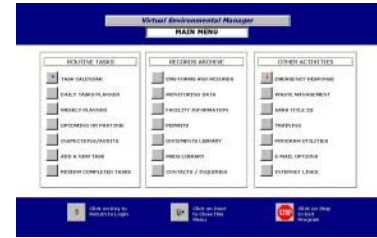
Virtual Environmental, Health & Safety Manager Database At-A-Glance



LOGIN SCREEN



CALENDAR SCREEN



MAIN MENU SCREEN

TYPICAL MENU OPTIONS IN VIRTUAL ENVIRONMENTAL, HEALTH & SAFETY MANAGER PROGRAM

<p>TASK CALENDAR The Task Calendar provides a 4-week view ahead to scheduled tasks assigned to the User.</p>	<p>EMERGENCY RESPONSE Links forms and records for emergency response activities, such as spill response plans, emergency equipment, etc.</p>	<p>EMS FORMS AND RECORDS Jumps to a menu that links forms and records associated with ISO 14001 Environmental Management System activities and documentation.</p>
<p>DAILY TASKS PLANNER Opens a form that generates a User-specific list of daily activities with a weekly checklist format.</p>	<p>HEALTH AND SAFETY Links forms and records for health and safety activities, including OSHA injury and incident reporting forms.</p>	<p>FACILITY INFORMATION Links facility information, including general information, records and site plans, if available.</p>
<p>WEEKLY PLANNER Opens a form that returns a checklist for other scheduled activities that will be due in the course of the week.</p>	<p>MONITORING DATA Jumps to a menu that links forms and records associated with wastewater, air emissions and other monitoring activities.</p>	<p>PERMITS Opens a list of environmental permits that have been issued to the facility, allowing the User to add, edit and delete records.</p>
<p>UPCOMING OR PAST DUE Opens a list of all scheduled tasks (excluding daily tasks) that are past due or will be due within the next 30 days.</p>	<p>WASTE MANAGEMENT Links forms and records for hazardous waste management, including waste manifest records and tracking.</p>	<p>DOCUMENTS LIBRARY Opens a list of HES related documents, allowing the User to add, edit and delete records.</p>
<p>INSPECTIONS/AUDITS Contains checklist forms for conducting various types of inspections and audits, as well as records of completed activities.</p>	<p>SARA TITLE III Records hazardous material storage and release information that can be input into EPCRA reporting forms.</p>	<p>MSDS LIBRARY Opens a list of MSDS maintained by the facility, allowing the User to add, edit and delete records.</p>
<p>ADD A NEW TASK Opens a blank Task Description Form to allow scheduling of a new task, which will then be added to the Task Calendar.</p>	<p>TRAINING Jumps to a menu linking forms and records for scheduling and tracking EHS training for all employees.</p>	<p>CONTACTS/INQUIRIES Directs the User either to records of specific external inquiries, or to a list of telephone contacts with complete "business card" information.</p>
<p>REVIEW COMPLETED TASKS Opens a list of all tasks (excluding daily tasks) that have been completed, with options to print for specified look-back periods.</p>	<p>PROGRAM UTILITIES Jumps to a menu providing setup, maintenance and troubleshooting information for the VEM program.</p>	<p>INTERNET LINKS Opens a list of helpful internet links, such as a site that identifies applicable laws and regulations.</p>
	<p>E-MAIL OPTIONS Pop-up menu allows the User to send e-mail messages with attachments generated by the VEM program.</p>	

Environmental Site Assessments / Due Diligence

T. Cozzie Consulting assists lending institutions, buyers and sellers in managing the potential environmental liabilities of real property arising from the use, storage and disposal of hazardous materials in many commercial and industrial activities. Depending on your needs, we can provide *Phase I Site Assessments* completed in accordance with the recognized ASTM Standard E 1527 work scope, or we can tailor the scope of the due diligence investigation to specific requirements of the client, buyer or lender. In some cases, the more cost-effective *Transaction Screen Process* may provide a reasonable level of comfort for low-capitalization loans and properties with little anticipated environmental impact.

More often than not, we can confidently evaluate your potential environmental risks without further, intrusive testing. If needed, though, our capabilities include asbestos and radon surveys, comprehensive soil, surface water and groundwater quality analysis, and other testing procedures that can provide more complete assessment of site conditions. Our field sampling activities are conducted under rigorous quality assurance procedures, using the latest, approved techniques and equipment.

We offer site investigation services by highly experienced practitioners *at very competitive rates*. Each site evaluation is performed by an environmental professional who has completed numerous similar assessments on properties ranging from forested acreage to agricultural land to complex manufacturing facilities.

We also offer *Portfolio Management* services to monitor and address environmental issues for packages involving multiple properties or special business risk concerns, as well as post-audit *Advisory Support* for users of the Environmental Site Assessment process.



Our scope of services and contract terms, as well as sample reports, are available for review at your request.

Site Investigation and Remediation Services



Within our working consortium of professional geologists, engineers, analysts and environmental scientists, **T. Cozzie Consulting** has broad, comprehensive experience in the investigation and, when necessary, remediation of impacts from an array of potentially toxic or hazardous materials, including petroleum products, solvents, pesticides and heavy metals, in various environmental conditions and situations. We offer innovative, cost-effective cleanup solutions to soil, groundwater and surface water contamination problems arising from:

- Petroleum Storage Facilities
- Dry Cleaning Plants and Other Sources of Halogenated Solvents
- Abandoned Industrial Sites
- Agricultural Activities
- Golf Course Maintenance

Risk Analysis

Risk Analysis is broadly defined to include risk assessment, risk characterization, risk communication, risk management, and policy relating to risk. **T. Cozzie Consulting** possesses the expertise to evaluate risks to human health and the environment, both built and natural.

Our personnel have worked extensively in characterizing risks and prioritizing cleanups at Department of Defense facilities as well as commercial hazardous waste and petroleum sites. We have extensive background in hazardous waste site characterization and prioritization, performing qualitative, quantitative, and probabilistic human health risk assessments. The results of the risk assessments are used to develop practical, risk-based, corrective action alternatives.

T. Cozzie Consulting personnel have contributed to US Environmental Protection Agency (EPA) documents, ranging from review and analysis of carcinogenic potency factors to establishing protocols for chronic toxicity reduction. We are experienced and knowledgeable in Federal applicable or relevant and appropriate requirements (ARARs) and risk assessment guidelines, as well as those specific to various States and US Territories.

List of Representative Projects

Location	Project Description	Start Date	Finish Date
Adairsville, Georgia	Compliance Evaluation, Manufacturing Facility	4/23/2004	8/13/2004
Indiana and Pennsylvania	Regulatory File Review for Recycling Facilities	7/8/2004	8/10/2004
West Palm Beach, Florida	Environmental Site Assessment with Phase II Soil and Groundwater Investigation, Former Gasoline Station	6/4/2004	8/7/2004
West Palm Beach, Florida	Soil Testing, Residential Property	6/24/2004	6/30/2004
Boca Raton, Florida	Phase I Environmental Site Assessment, Commercial Warehouse	5/28/2004	6/10/2004
Memphis, Tennessee	Audit of Hazardous Waste Treatment Facility	2/23/2004	4/5/2004
Miami, Florida	Site Assessment, Former Gasoline Service Station	3/26/2003	4/4/2004
Belton, South Carolina	Air Permit Renewal Application	10/6/2003	3/10/2004
Miami, Florida	Site Assessment, Active Gasoline Service Station	11/18/2003	2/28/2004
Brevard County, Florida	Continuing Environmental Compliance Consulting Services, Manufacturing Facility	1/1/2003	2/9/2004
Medley, Florida	Risk Assessment for Exposure to Lead in Soil, Industrial Property	6/12/2003	1/13/2004
West Palm Beach, Florida	Phase I Environmental Site Assessment, Vacant Property	10/27/2003	12/12/2003
Belle Glade, Florida	Phase I Environmental Site Assessment, Industrial Property	11/7/2003	11/22/2003
Miami, Florida	Site Assessment, Active Gasoline Service Station	2/1/2003	11/18/2003
Palm Beach County, Florida	Zero-Discharge Wastewater Permit Renewal Application	9/11/2003	11/4/2003
West Palm Beach, Florida	Update to Phase I Environmental Site Assessment	6/12/2003	10/1/2003
North Miami Beach, Florida	Remedial Action Plan, Gasoline Service Station	10/4/2002	10/1/2003
West Palm Beach, Florida	Environmental Site Assessment with Phase II Soil and Groundwater Investigation, Former Car Wash	7/24/2003	9/26/2003
St. Joseph's County, Indiana	Environmental Compliance Data Management Program, Manufacturing Facility	12/3/2001	9/20/2003
Ocoee, Florida	Audit of Used Oil Recycling Facility	4/22/2003	6/22/2003
Palm Beach County, Florida	Source Removal for Soils Contaminated with Heavy Metals	3/31/2003	6/20/2003
Lake Park, Florida	Groundwater Monitoring Program, Automotive Salvage Yard	8/12/2000	5/20/2003
Conyers, Georgia	Groundwater Monitoring Program, Manufacturing Facility	3/10/2003	5/9/2003
West Palm Beach, Florida	Phase I Environmental Site Assessment, Commercial Facilities	3/27/2003	5/8/2003
Medley, Florida	Soil Testing, Industrial Property	3/10/2003	4/9/2003

Key Personnel

Thomas Cozzie, President

Environmental Scientist
(See Attached CV)

Schedule of Fees

Principal / Professional:

\$90/hour

Field Scientist:

\$75/hour

CADD / Administrative:

\$40/hour

Office Locations and Contact Information

Florida Office:

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Fax: (561) 338-6308

e-mail to: tcozzie@tcozzie.com

Internet:

www.tcozzie.com

Thomas A. Cozzie

PRESIDENT, T. COZZIE CONSULTING, INC.

QUALIFICATIONS AND EXPERIENCE

Mr. Cozzie specializes in technical and regulatory matters involving the management of toxic substances and hazardous wastes. He has more than 15 years experience in the environmental field, including five years with State and local regulatory agencies in Southeast Florida. His government experience included administration of the facilities permitting and compliance aspects of one of the nation's most progressive groundwater protection programs. Prior to founding T. Cozzie Consulting Inc. in 1997, he had progressed to the position of Regional Manager in charge of a profit/loss center for a mid-sized, Southeastern U.S. consulting firm.

Mr. Cozzie has overseen site investigation and remediation activities involving hazardous wastes, solvents, petroleum products and pesticides. He has extensive experience in regulatory permitting and compliance activities, particularly for industrial clients. He has performed or supervised due diligence assessments, including complex Phase II investigations, on hundreds of properties, from vacant parcels to large commercial and industrial facilities. Mr. Cozzie also has assisted manufacturers in the development and implementation of Environmental Management Systems, in some cases specifically aimed toward ISO 14001 EMS registration.

KEY PROJECTS

The following key projects highlight Mr. Cozzie's experience:

Numerous Phase I & II environmental site assessments for industrial, agricultural and petroleum marketing facilities in Florida, Alabama, Mississippi, Tennessee and Texas.

Development and implementation of ISO 14001 Environmental Management System for aluminum manufacturing facility.

Management of environmental compliance activities for industrial facilities, including an aluminum extrusions plant and an inorganic chemicals manufacturer.

Investigation of soil and groundwater contamination by halogenated solvents at an abandoned industrial site.

Evaluation of treatment alternatives for removal of dissolved metals from industrial wastewater stream discharging to surface waters.

Development and implementation of a remedial plan to address soil and groundwater contamination by pesticides, heavy metals and petroleum on a large agricultural property.

Negotiation to address RCRA corrective action requirements for an industrial site impacted by discharges containing solvents, petroleum products and heavy metals.

KEY PROJECTS (CONT'D)

Preparation of permit applications and development of source reduction alternatives for a Title V major source of hazardous air pollutants.

Initial remedial actions and contamination assessments to address petroleum discharges at facilities in the Everglades Agricultural Area.

Review of regulatory implications for design and implementation of treatment system for hazardous waste waters at bulk fuel storage facilities.

Groundwater contamination and vapor migration assessment for an abandoned municipal landfill.

Regulatory compliance evaluation of a regional hospital facility.

Expert witness testimony in administrative hearing involving alleged discharges of chlorinated solvents at a dry cleaning facility.

Preparation of Spill Prevention, Control and Countermeasure (SPCC) Plans, Facility Response Plans and Hazardous Waste Contingency Plans for various clients.

ACADEMIC BACKGROUND

Bachelor of Science - Biology; University of Notre Dame, Notre Dame, Indiana.

Master of Science - Environmental Sciences; State University College of Environmental Science and Forestry, Syracuse, New York.

PROFESSIONAL AFFILIATIONS

National Association of Environmental Professionals

Air and Waste Management Association

American Society for Testing and Materials Committee E-50,
Environmental Assessment

U.S. Technical Advisory Group to ISO 207, Environmental
Management Systems

OTHER TRAINING AND SKILLS

OSHA Hazardous Waste Operations and Emergency Response 40-hour
training and annual refreshers

EPA/AHERA Certified Asbestos Inspection and Assessment
