



David Edge –  
Executive Vice President, Environmental Business Unit

B.S. Bioenvironmental Sciences – Texas A&M University, College Station, Texas

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**Areas of Expertise:**

David Edge has 20 years of experience in the environmental field. He is the Executive Vice President (EVP) of RPS' Environmental Business Unit which consists of five business lines, Air Quality, Remediation/Compliance Services, HSE, Water Engineering and Water Resources. In the role of EVP David is responsible for business strategies, staffing and financial results.

David's technical background is in Air Quality where he has extensive experience including Title V and NSR permitting projects, performing due diligence audits, and being the lead consultant for compliance related issues. Prior to joining RPS in 2005, David worked for the Texas Commission on Environmental Quality where he was involved in program development, rulemaking, regulation interpretation, and special investigations. He provided guidance and assistance to the TCEQ staff and the regulated community with regard to Title V compliance reporting. David has extensive knowledge of the enforcement process and he has been involved in numerous compliance investigations.

**Experience Includes:**

**RPS**

Executive Vice President	2013 to Present
Director of Air Quality	2008 to 2013
Senior Consulting Scientist	2005 to 2008

**Technical Experience**

- Air Quality Programs
- Title V and NSR Permitting Projects
- Due Diligence Audits
- Compliance-Related Issues

**Representative Projects:**

CITGO Refining and Chemicals Company LP – MSS Permitting (Corpus Christi, Texas): Prepared air quality permit applications to address MSS emissions at the refineries. Tasks included working with CITGO staff to identify MSS activities for permitting, obtain data, and calculate emission estimates.

Lyondell Chemical Company – MSS Permitting Training Event: Currently working with corporate representatives on developing a training program for Lyondell facilities. The training preparation includes analysis of existing facility MSS data/records. The training event will assist facilities in developing a permitting strategy and updating facilities on MSS issues encountered during the preparation and review of permits for the refining industry.

Huntsman Petrochemical Corporation – Port Neches Performance Products: Provided onsite support when the ethylene unit representative left for other employment. Responsibilities included documenting PBR authorizations, emission event reporting, preparing Title V deviation reports and interacting daily with operations personnel.

Valero Energy Corporation – Compliance History: Project Manager, conducted review and appeal of two refinery's TCEQ compliance history which resulted in refinery's compliance history rating being upgraded from "poor performer" to "average performer."

Valero Energy Company – MACT CC Audits: Served as a member of RPS Audit Team that performed a MACT CC compliance audit at eleven of Valero's refineries. The audits, which were performed on-site and included both record and field-review elements, covered all areas of MACT CC compliance.

ConocoPhillips Company – Title V Permit Revision (Borger Texas): Identified necessary changes/additions to applicable requirements resulting from a federal consent decree and construction of new process units. Prepared the revision application to address the changes and negotiated provisions acceptable to the company during the application review process.

Valero Energy Corporation – Multimedia Due Diligence Audit: Air Quality Auditor, conducted the air quality assessment of a pre-purchase environmental due diligence evaluation of two refineries and two bulk terminals.

Nucor Steel Jewett Division – Title V Compliance Assistance (Jewett, Texas): Worked with company staff on interpretation of requirements that apply at the site. Set-up tracking sheet to assist with identification of deviations.

Texas Commission on Environmental Quality – PBRs 106.263 (Routine MSS) and 106.8 (Recordkeeping): Participating Author, provided input to the development of the PBRs. Wrote provisions of the PBRs pertaining to requirements for maintaining records and demonstrating compliance.

Texas Commission on Environmental Quality – Special Investigations: Lead Investigator/Technical Resource, participated in several high-profile investigations. Provided assistance to the Enforcement and Litigation Divisions during settlement discussions. Industry types audited during these high-priority investigations include a foundry, steel mill, electric generating unit, and a natural gas midstream processing unit.

Texas Commission on Environmental Quality – Title V Reporting Guidance: Program Liaison, developed, maintained and updated guidance related to Title V deviation reporting and certification. Provided training at the TCEQ Emissions Inventory and Air Permitting workshops for the regulated community as well as daily assistance to TCEQ staff.

### **TCEQ Field Operations Division (FOD), 2000 – 2005.**

#### *Air Program Liaison*

- Point of contact for complex compliance and enforcement issues encountered by regional investigators.
- Division expert in Title V deviation reporting and certification requirements.
- Managed special projects and investigations, specifically, PSD related issues.
- Member of environmental management system audit team. Involved in interpreting NSR, MACT, NSPS, and NESHAP requirements.
- Represented FOD on numerous rulemaking teams.
- Provided technical support to legal staff concerning air quality issues.

### **TCEQ Pollution Prevention (P2) and Industry Assistance, 1998 – 2000.**

#### *Engineering Specialist*

- Provided technical assistance and training to regulated entities interested in reducing waste and emissions through source reduction and waste minimization.
- Conducted on-site assistance visits for a variety of industries.
- Acquired knowledge of a wide range of industrial processes.
- Trained organizations to develop and implement effective P2 teams.
- Helped regulated entities save money and reduce waste and emissions through training, workshops, and site-visits. Planned, organized, and implemented workshops with up to 100 attendees.

### **TCEQ Air Quality Enforcement, 1994 – 1998.**

#### *Coordinator*

- Coordinated formal enforcement cases which resulted in corrective action and assessment of penalties. Cases involved violations of NSR, MACT, PSD, SIP, and other air related requirements.
- Analyzed investigations and other information to determine validity of violations.
- Developed in-depth knowledge of various industrial processes and their applicable rules.
- Negotiated appropriate corrective action and penalties. Trained investigators how to document violations and develop enforcement cases.

#### **Publications and Presentations:**

Title V Compliance Workshop, Houston, Texas, February 2005