



## *Thomas G. Rigo*

34 years of diversified environmental consulting and regulatory compliance experience.

Consulting experience includes

Regulatory agency experience includes more than 26 years of employment with Ohio EPA's Division of Air Pollution Control with more than 22 of those years as Manager of the Field Operations and Permit Section. Responsible for: the management of the five district offices and nine local air agencies that includes the negotiation, development and implementation of work agreements and contracts. The issuance of all air pollution control permits, variances, findings and orders. Coordinated enforcement with the Northwest District, Southwest District, Southeast District, Cleveland and Toledo Local Air Agencies. This included the drafting and negotiating of finding and orders with facilities believed to be in violation of one or more requirements, the development of various briefing memos including referrals to the Ohio Attorney General's Office, calculating penalties utilizing U.S. EPA's Air Civil Penalty Policy and use of the BEN financial model, and testifying at both the Environmental Rules Appeal Committee (ERAC) and court proceedings. Worked with entities, district office and local air agencies, the Ohio Attorney General's Office, and U.S. EPA to remedy the violations. Development of updating of various air pollution control rules primarily in the air permit and fee areas. Primary author of a number of engineering guides (#58 - Definition of "Facility" for Ohio Title V Permit Program, #59 - Identification of Required Fields in a Title V Permit Application, #61 - Policy on Limiting Potential to Emit of a Facility to Avoid Title V Permit Applicability, #62 - Identification of Trivial Air Contaminant Emission Activities for Preparing Title V Permit Applications, #63 - Guidance on the Need to Revise Title V Permit Applications for Changes in Federally Required Information, #64 - Clarification on Addressing Emergency Action Plan Requirements in Title V Permit Applications, and #71 - Requirements for Reporting Emissions from very Small Emissions Units in the Annual Fee Emission Reports) implemented by the division. Managed the development of Ohio's Title V Air Permit Program which includes the legislation, rules, computer systems (STARS, STARShip), and fees and

supporting systems required to fund the air pollution control programs identified in the Clean Air Act of 1990. Primary author of Ohio's Title V Compliance Certification Form and corresponding instructions and examples. Worked with a number of regulated entities, environmental community and regulators on the development of the Title V permit and fee programs. Primarily this outreach work was accomplished through the development of the Air Permit Advisory Group (PAG). Conducted numerous training workshops throughout the State on Title V and other permitting topics. These workshops were conducted for the Manufactures Education Council, American Bar Assn., Cincinnati Bar Assn., GPD Associates Power Seminar, Environmental Symposiums in Cincinnati, Cleveland, Akron and Columbus, Ohio Chamber of Commerce, The University of Akron - Wayne College, TolTest/ Marshall & Mehorn, Cleveland Society for Coatings Technology, Squire, Sanders, & Dempsey, Dayton Power & Light, Ohio AgriBusiness Assoc., OBS Environmental Law Seminar, Cuyahoga County Planning Commission, and Ohio Manufacturers Assn. For one year, managed the Ohio E-Check program through its trouble start. In addition, two years employment at Ohio EPA's Central District Office. Responsible for: the monitoring and tracking of time oriented obligations from air pollution control permits and variances, NPDS permits, and solid waste permits.



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### **Fields of Competence**

- Air Quality Evaluations
- Clean Air Act Strategic Planning
- Title V Permitting and Training
- Title V Compliance Certifications
- Title V and Non-Title V fee emission reports
- Emission Inventory Development
- Professional Testimony/Presentations
- Control Technology Evaluation (RACT/BACT)
- MACT Evaluations and Development
- Environmental Management System (EMS) Development
- Ohio Administrative Code Rule Writing/Revisions
- USEPA Air Civil Penalty Policy and the BEN financial model used to calculate economic benefit
- Multi-Media Compliance Audits
- Extensive air quality experience in Title V, PSD, NSPS, MACT, 112r, state permitting, regulatory negotiations, and development of corporate and facility compliance, audit, training, and environmental management programs.

### **Education**

- B.S., Administrative Science (accounting major), The Ohio State University, 1978

### **Professional Affiliations**

- Air & Waste Management Association
- Flexible Pavements of Ohio Inc.
- Ohio Cast Metals Association
- Ohio Aggregates and Industrial Minerals Association
- Joint Industry/Ohio EPA Permit Processing Efficiency Committee
- Ohio EPA Permit Advisory Group and Technical Permit Advisory Group
- Starship Rebuild Workgroup