

Case Study

Trinity's Technical RCRA Expertise Supports Streamlined Permitting



Challenge

RCRA permit applications often require volumes of detailed technical information to warrant efficient and effective issuance.



Solution

Trinity's dedicated team of RCRA permitting experts offers turnkey services that streamline the permitting process.



Result

Our services minimize strain on internal staff, decrease deficiencies in Part A and Part B applications, streamline permitting and permit updates and modifications, and validate company compliance in public hearings, leading to 100% permit issuance.

Hazardous Waste Permitting

The U.S. EPA Resource Conservation and Recovery Act (RCRA) governs permitting of hazardous waste (HW) treatment, storage, and disposal facilities (TSDFs) nationwide. Permits are divided into two parts: Part A provides basic information about the facility; Part B involves a lengthy narrative, often running more than 1,000 pages, detailing facility processes, design capacities, specific HWs handled, plans for waste analysis, contingency, personnel training, and closure, and other complex environmental details.

For more than three decades, Trinity Consultants has specialized in developing, renewing, and modifying RCRA permits for clients, offering turnkey and general support services that keep TSDFs in operation and in compliance.

I've been working with Trinity environmental services for approximately three years, and I can confidently say that they are the best highly respected, skilled professionals in the industry. Trinity has helped me with critical thinking, problem solving and making decisions for complex and ever-changing regulations of hazardous waste management with ease and efficiency. – VP of Regulatory Affairs and Sustainability



trinityconsultants.com / 800.229.6655

Challenge

All TSDFs must satisfy RCRA permitting requirements. Expiring permits must be renewed, and any facility and operational changes must be evaluated and appropriately detailed in modification applications.

Applications can be deemed deficient or denied on a host of issues, requiring complex and often extensive and costly agency interaction. In these cases, technical evaluations must be performed to support the application process. In some cases, public notice is required for approval, which can include public hearings.

Details of the RCRA process can vary from state to state, complicating multi-site applications. Trinity is well-versed in preparing applications that pass regulatory inspection and comply with the nuanced requirements of any state governing body.

Solution

Trinity's RCRA permitting expertise supports clients nationwide. We perform RCRA permitting services for numerous industries, including cement, chemical, pharmaceutical, waste treatment, and others. Our RCRA-related services include:

- ▶ Human Health Risk Assessments
- ▶ Solid waste management unit evaluations and corrective action
- ▶ Air and water permitting
- ▶ Air and water modelling
- ▶ Process flow diagrams
- ▶ Instrumentation programs
- ▶ Multi-faceted properties
- ▶ Spill capacity and secondary containment verification
- ▶ Tank assessments
- ▶ Engineering design
- ▶ Compliance plans
- ▶ Stack testing protocols, oversight, and reporting
- ▶ Compliance audits and documentation review
- ▶ Public hearings
- ▶ HW generator support and compliance

Trinity's dedicated team of permitting experts is further supported by a variety of proprietary software and third-party consultants to facilitate timely and accurate RCRA permit application submissions.

Result

Here are some examples of how Trinity RCRA permitting services have benefited clients:

- ▶ Trinity helped a leader in hazardous waste collection, chemical disposal, and treatment solutions respond to permit application deficiencies and submit a Class 3 permit modification application to restore regulatory compliance and expand their facility for increased container storage capacity.
- ▶ Our team prepared a Class 3 permit modification application for increased tank storage, PE-certified replacement tank storage facilities, and represented a cement industry pioneer as part of their public hearing, successfully paving the way for future operations and economic growth.
- ▶ Trinity helped a leading U.S. manufacturer of cement effectively permit an operating cement kiln as an existing hazardous waste combustor, prepared a human health risk assessment for the site, and permitted hazardous waste fuel facility storage and treatment in accordance with RCRA and Clean Air Act requirements.

Trinity has helped me train our staff and navigate the complexities of hazardous waste permitting and compliance with ease and efficiency. They have always delivered high-quality work on time and are very responsive and thorough whenever I've had any questions or concerns. I highly recommend Trinity to anyone who needs an advocate for agency interaction and reliable assistance with their hazardous waste management and permitting needs.
– Director of Environment & Sustainability

About Trinity

Founded in 1974, Trinity Consultants helps organizations overcome complex, mission-critical challenges in EHS, engineering, and science through expertise in consulting, technology, training, and staffing. We support clients in geographies worldwide and across a broad range of sectors including industrial, energy, manufacturing, mining, life sciences, and commercial/institutional.