

# REGULATORY ASSISTANCE

## Environmental Justice Solutions



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.

Environmental Justice (EJ) initiatives led by EPA are focused on implementing a more systematic approach to reducing environmental and health disparities for minority, low-income and tribal populations and improving the air, water, and land in these communities.

These EJ initiatives have been pursued for decades; however, recent legislative developments, changes in agency procedures, public participation, plus investor and external stakeholder actions are requiring regulators and the regulated community to apply significantly increased attention to potential EJ exposure and assure their actions are not causing disparate adverse environmental, health, or safety impacts on vulnerable communities. For example, recently proposed federal legislation could preclude authorization for new major sources and continued operation of existing major sources in overburdened areas.

Since its founding, Trinity Consultants has provided support that assures protection of the environment while enabling commercial and industrial economic growth. Our solutions focus on mitigating environmental exposure and developing process safety, contingency, pollution prevention, and risk management plans to protect the communities our clients are an integral part of and serve. The following Trinity services focus upon potential impact and protection of the most sensitive populations in the community, which is a key element of Environmental Justice.

### Planning and Due Diligence Services

- ▶ Feasibility and risk assessments
  - Acquisitions, capital projects, existing operations, proposed regulations, and agency procedural changes
- ▶ Surrounding community profile and EJ risk review

### EJ Risk Reviews

#### Legislative Impact Review

While there are a variety of legislation to review potential impacts for your operations, here is an example of how we would assess per the site-specific Clean Future Legislation NATA. Our analysis would, if applicable, present EJ risk assessments in tabular and graphical formats by comparing the area surrounding the facility to the legislation's definition of "overburdened census tract" and would include the following.

- ▶ Census tract data mapped in ArcMap Geographical Information System
- ▶ National-Scales Air Toxics Assessment (NATA) dataset
- ▶ Total cancer risk (per million) per census tract
- ▶ Annual mean PM<sub>2.5</sub> concentrations from the nearest active monitors for comparison to the proposed threshold of 8 mcg/cu. meter

### EJ Screening Assessments

- ▶ Various screening models used include EPA EJSCREEN, CalEnviroScreen
- ▶ Important elements such as identifying nearby communities with high demographic indexes that include:
  - Vulnerable populations (low income, minority, indigenous, linguistically isolated, limited education, young, and elderly)
  - Sensitive facilities and receptors (hospitals, schools, parks, places of worship, public housing, subsidized housing, flood hazard, flood plain)
- ▶ Mapping with Risk Screening Environmental Indicators (RSEI)



- ▶ Mapping environmental indicators, EJ indexes, and surrounding facilities for:
  - NATA cancer risk
  - NATA respiratory hazard index
  - Particulate matter, ozone, NATA diesel PM
  - Risk Management Plan (RMP) proximity
  - Hazardous waste proximity (TSDF)
  - Superfund Proximity and Locations (NPL)
  - Wastewater discharge indicator and locations
  - Traffic proximity and volume
  - Lead paint indicator
  - Locations of surrounding Toxic Release Inventory (TRI), Air Emission Inventory (EI), and brownfield sites

## Existing Agency Program/Policy Impact Review

- ▶ Federal programs
- ▶ State and local programs, such as California AB 617 that require:
  - Community plans, BARCT, EI enhancements, incentive funding, penalty limits

## Peer Comparisons/Benchmarking

- ▶ Impact/exposure comparisons of cancer risk, existing ambient concentrations, applicable compound ambient standards or screening levels
- ▶ Emission levels
- ▶ Surrounding community evaluations that include demographics and proximity to residences and sensitive public receptors

## Historic EHS Reports Evaluation

- ▶ TRI reports
- ▶ Annual air emission inventories
- ▶ NPDES & POTW reports
- ▶ Solid/Hazardous waste reports
- ▶ Release/spill reports
- ▶ Misc. chemical reports
  - RMP plans
  - Right-to-Know reports (Emergency Planning Notifications, SDS Reporting, Tier II Reports)
  - TSCA reports

## State-by-state EJ Developments

Summary of EJ legislative and rule developments in each jurisdiction for existing and potential future operations.

## EJ Risk Mitigation

Advisory and technical assistance with EJ risk mitigation options including:

- ▶ Review and correction of historic TRI and emissions reports
- ▶ Conduct operations and process reviews to reduce ambient impacts and exposure by:
  - Dispersion modeling and monitoring to help identify most significant sources, operations and processes
  - Identify areas for optimization with regard to:
    - ◆ Dispersion modeling improvements
    - ◆ Process adjustments
    - ◆ Pollution prevention (P2 & SWPPP)
    - ◆ Emission reductions
    - ◆ Energy use
    - ◆ Control implementations
- ▶ Improve community relations with programs such as community education, public notices, and public hearings

## EJ Training

Classroom and webinar training on EJ regulatory developments, risk assessment, screening tools, and risk mitigation.

## Permitting

- ▶ NEPA/CEQA assessments which trigger EJ review
  - Significant public health effects
  - Adverse environmental impacts
- ▶ State-specific permits requiring EJ analyses
- ▶ Health Risk Assessments (HRA) of impacts on disadvantaged communities

## BREEZE and CalEEMod Software

Additional tools that can be leveraged for an EJ assessment and risk mitigation.

## Why Choose Trinity

In short, there's no better choice for your EHS needs. Our experience is multi-faceted and extensive. Our strategies are innovative, time saving, and cost-effective. Our staff and tools are the best in the business.

For more information about how we can help your organization, please contact Trinity Consultants by calling 800.229.6655.

*ISO 9001:2015 certified at our corporate office in Dallas, Texas*