

REGULATORY ASSISTANCE

Water Quality Permitting and Compliance

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.

The Clean Water Act (CWA) establishes regulatory requirements applicable to discharges of pollutants to Waters of the United States (WOTUS). Statutory requirements include the need for discharge permits, and associated sampling and monitoring. Trinity provides organizations with permitting and compliance assistance in the following water quality areas:



- ▶ Wastewater
 - NPDES/SPDES permits for direct discharges
 - Pretreatment permits for indirect discharges to POTWs
 - Land application, water reuse, and zero-discharge permits
 - Permit negotiation (conditions and limits)
- ▶ Stormwater Permitting and SWPPP development for:
 - Construction activities (CGP)
 - Industrial activities (Multi-Sector and Individual permits)
- ▶ Spill Prevention
 - Preparation of SPCC Plans
 - Preparation of Facility Response Plans (EPA, USCG)

NPDES/SPDES Permitting

To support the CWA objectives of restoring and maintaining the chemical, physical, and biological integrity of the nation's waters, EPA developed the National Pollutant Discharge Elimination System (NPDES) program, a major regulatory program designed to control the discharge of pollutants. The NPDES program mandates that all point-source dischargers obtain discharge permits that contain technology-based or water quality-based effluent limits, as well as any other standards or conditions necessary to protect receiving waters. Some states follow a similar state version (SPDES).

Trinity assists clients in obtaining both individual and general NPDES permits and pretreatment discharge permits. We also assist with NPDES program audits, water sampling, sampling protocols, and development of electronic data systems for discharge monitoring reports.

Industrial facilities covered by a stormwater permit must develop and implement a Stormwater Pollution Prevention Plan (SWPPP). This plan includes facility-specific information (e.g., drainage maps, pollution prevention team members, and potential sources of stormwater pollution) as well as management practices, employee training, and recordkeeping. Trinity has developed SWPPPs for a variety of industrial and construction activities.

Spill Prevention, Control, and Countermeasure Plans

The CWA requires facilities that could reasonably be expected to discharge oil or petroleum products in harmful quantities into or upon the navigable waters of the U.S. to prepare a Spill Prevention, Control, and Countermeasures (SPCC) plan. SPCC plans ensure that facilities address secondary containment and other controls that would prevent oil spills and mitigate the effects of a spill.

While each SPCC plan is unique to the facility it covers, it must include the following elements:

- ▶ Description of containment and/or diversionary structures
- ▶ Quantity of oil that could be released





- ▶ Prediction of the flow direction and rate
- ▶ Inspection, monitoring, spill response and training procedures

Trinity has extensive experience developing SPCC plans and updating plans per regulatory requirements.

Wetlands Permitting Assessment

Section 404 of the CWA requires wetlands permitting for any project that would “fill in” waters and/or wetlands of the US. The US Army Corps of Engineers (USACE) administers the wetlands program.

Trinity can conduct general wetlands assessments to delineate the presence or absence of wetlands and estimate the amount of affected wetlands/uplands. If required, a complete Section 404 wetlands permitting effort includes the following tasks:

- ▶ A pre-application meeting with the USCOE
- ▶ A complete wetlands delineation
- ▶ An individual Section 404 permit application
- ▶ A structured alternatives analysis in accordance with Section 404(b)(1) guidelines
- ▶ A conceptual mitigation plan to offset wetlands impacts

Water Monitoring and Sampling

Water quality regulations can be complicated and many times require integrating municipal, state, and federal requirements.

Trinity has expertise to support clients with the following:

- ▶ Monitoring and sampling plan development
- ▶ Wastewater, surface water, stormwater, and groundwater sampling
- ▶ Stormwater inspections
- ▶ Sediment sampling
- ▶ Discrete and continuous sampling
- ▶ Laboratory analysis contracting
- ▶ Database management and reporting

Aquatic Biology

Through our Minnow Aquatic Environmental Services team, Trinity has expertise in aquatic ecology, fisheries biology, benthic invertebrate ecology, water and sediment quality, toxicology, and environmental behavior, transport and fate of chemicals. Related project experience includes:

- ▶ Baseline studies
- ▶ Regulatory approvals and permits
- ▶ Chemical and geochemical investigations
- ▶ Environmental effects monitoring (EEM)
- ▶ Monitoring program design
- ▶ Statistical evaluations of water, sediment and biological data
- ▶ Water quality objectives and guideline development
- ▶ Water quality and effluent plume modelling
- ▶ Impact assessments
- ▶ Species inventories and habitat evaluations
- ▶ Senior advisory input
- ▶ Communications and training

Why Choose Trinity

For support with any water quality regulatory permitting and compliance issues, Trinity can help. Our team’s understanding of the regulatory requirements and your industrial processes ensure that your project can be completed timely, accurately, and within budget. For more information about how we can help your organization, please contact Trinity at 800.229.6655.

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