

# REGULATORY ASSISTANCE

## EHS Consulting for Alabama Industry

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.

For more than 45 years, Trinity has focused on providing unparalleled EHS consulting services in the areas of permitting and compliance, regulatory applicability analyses, and environmental impact assessments.

Trinity's technical staff are some of the industry's most experienced environmental professionals with particular focus in requirements under the Clean Air Act. This is in direct contrast to many larger "international" engineering consulting firms that sell their large resource base, while less than 1% of their staff has responsibilities that include air quality – a key requirement to provide valuable services to Alabama facilities. Our company-wide focus and dedication to environmental permitting and compliance gives us an unparalleled level of collaboration, experience, knowledge, and efficiency. This allows us to deliver the "right" solutions, tailored to meet each of our client's needs, at a competitive cost.



In addition, our geographical presence allows us to bring experience and ideas to the table that firms limited to one state simply cannot provide. Trinity is not limited to the ideas and challenges of a single state, but can offer robust solutions based on the national forefront of environmental permitting and compliance strategy. Furthermore, by maintaining local offices with staff intimately engaged in state and local agencies, Trinity can offer national experience tailored to your local area.

Trinity serves a very broad cross-section of industries with various environmental multimedia needs. With direct experience serving Alabama based facilities, Trinity capitalizes on our diverse project exposure to bring additional insight and strategy to environmental compliance for these facilities.

### Trinity's Services

Trinity provides broad environmental permitting and compliance assistance to our clients. Highlighted below are key areas of expertise. We pride ourselves in providing high quality yet cost-competitive compliance solutions to our Alabama clients.

#### Air Quality Permitting

Trinity's air permitting experience is unmatched in all aspects including Prevention of Significant Deterioration (PSD) permitting, Title V permitting, state construction and operation permits, emissions quantification, regulatory applicability analyses, criteria and greenhouse gas best available control technology (BACT) assessments, air dispersion modeling, and permit application preparation. Trinity works closely with the client to develop an optimal air permitting strategy. Our project team accounts for all potentially applicable requirements while preparing the permit application quickly and with a goal of ensuring maximum operating flexibility.

With the implementation of more stringent National Ambient Air Quality Standards (NAAQS), dispersion modeling is often the critical factor in obtaining an air permit. Trinity is a premier dispersion modeling firm and can help navigate these standards that have become critical to project approval. Furthermore, Trinity complements these services with ambient modeling services that have assisted our clients in preparing well-defined strategies and planning for capital projects. If a permit is not required, Trinity documents non-applicability for our client's files. Otherwise, Trinity prepares and submits the necessary permit applications to the state and/or local agencies and communicates promptly and effectively with permitting staff to follow-up on outstanding items.

## EHS Auditing

Trinity is also respected for our skills in evaluating compliance with regulatory requirements and conformance with management system processes and practices. Using extensive permitting experience and in-depth knowledge of state and federal environmental regulations, Trinity is ideally suited to conduct effective compliance audits to ensure that all applicable regulations have been properly addressed, determine compliance status, and suggest corrective action where needed. The result is a complete picture of all regulatory requirements to help our clients attain or maintain compliance. Trinity provides a full range of audit services from audit planning through implementation and closure of corrective action items.

## Compliance Reporting

Trinity routinely assists clients with recurring compliance obligations. In addition to preparing annual compliance reports, Trinity is accustomed to reviewing on-site records and related process information, including detailed CEMS data, to assist in required documentation and assessment of compliance status. Trinity can develop site-specific tools and procedures that can be used for future reporting to minimize compliance burden or assist with the implementation of enterprise EHS management information systems (EMIS) to facilitate task tracking, monitoring of key performance indicators (KPIs), and report preparation.

## Multimedia Environmental Services

Trinity assists with multimedia regulatory requirements including, but not limited to: wastewater permitting (NPDES, indirect discharges), CWA Section 316(b) (CWIS Rule) compliance, SPCC Plan development and training, stormwater planning and management, wetlands and waters of the U.S. jurisdictional determinations, CWA Section 404 permits, solid waste management and hazardous waste determinations, EPCRA reporting (Section 312 and 313), RMP audits and plan preparation, due diligence for mergers and acquisitions, and noise monitoring and modeling.

## Trinity in Alabama

- ▶ Trinity hires talented professionals with engineering and meteorological backgrounds with advanced degrees and professional certifications. This talented and experienced staff brings nationwide expertise and diverse insight and ideas to the state in order to strategically plan for what's next in Alabama. This allows Trinity to deliver high quality solutions efficiently and cost effectively.
- ▶ With staff across the southeastern U.S. including in Trinity's Birmingham Office, Trinity offers a high-level of responsiveness for same-day on-site service.
- ▶ Trinity has established intimate relationships and experience with Alabama's key state regulators. Trinity is highly experienced with the state's air permitting process.
- ▶ Trinity's national and state-specific experience in permitting Alabama's industrial clients, gives Trinity a deep understanding of the needs and the effort required to obtain permits for new capital projects in Alabama.

- ▶ Trinity has nationwide experience and knowledge of new regulations and continuously shares our expertise with industry. Other firms with small air quality groups or limited exposure to single geographic areas simply cannot offer the same level of analysis in a timely fashion.
- ▶ Trinity's national and state-specific experience in permitting Alabama's industrial clients, gives Trinity a deep understanding of the needs and the effort required to obtain permits for new capital projects in Alabama.
- ▶ Trinity has provided these representative services to Alabama clients:
  - PSD permitting for multiple facilities – Recent examples include combined heat and power/tissue machine projects at a paper mill, a vertical kiln project at a lime plant, and addition of continuous, direct-fired lumber kilns at a lumber mill
  - Environmental compliance program management for a lumber and wood pellet manufacturer
  - Greenfield permitting strategy development for a new lumber mill
  - Assistance with PSD applicability assessments and authorizations for small non-PSD projects as well as a complex PSD-avoidance permitting for a new biomass boiler at an integrated pulp and paper mill
  - Boiler MACT compliance strategy development and reporting assistance for multiple wood-fired boilers at different facilities
  - Emissions inventory and permitting strategy support for a liquefied natural gas (LNG) plant
  - Permitting for fuel system changes as well as sulfur dioxide (SO<sub>2</sub>) data requirements rule (DRR) support for various facilities in the lime industry
  - On-site environmental compliance assistance for a calcium carbonate plant
  - Title V operating permit renewal applications for various industries including a roofing and asphalt plant and energy production complex
  - EHS compliance audits for general manufacturing and a detailed PSD compliance audit for a cabinet manufacturer

## Trinity Can Help

For more information about how we can help your organization, please contact the Trinity Birmingham office at 205.970.6035.

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