

# REGULATORY ASSISTANCE

## EHS Consulting for Kentucky 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 been highly focused on providing top-notch environmental consulting assistance in the areas of air permitting and compliance, regulatory applicability analyses, and air dispersion modeling.

Trinity established the Covington, Kentucky office in 2004 to better serve our clients in Kentucky and southwest Ohio. Trinity is now recognized as a leader in EHS consulting services to Kentucky industry. Our local staff consist of EHS professionals with engineering backgrounds, many whom have earned graduate and post-graduate degrees and professional certifications. This diverse and multi-disciplined group of experienced professionals allows Trinity to deliver the highest quality solutions, efficiently, and cost effectively.



Trinity provides quality consulting services to a wide range of industries, including:

- ▶ Aluminum Manufacturing
- ▶ Building Products
- ▶ Chemical
- ▶ Electric Power
- ▶ General Manufacturing
- ▶ Metal Fabrication
- ▶ Petroleum Refining
- ▶ Pipelines and Terminals
- ▶ Steel Manufacturing
- ▶ Surface Coating

### Kentucky Air Quality Permitting

Whether constructing a new industrial facility, expanding an existing facility, or modifying operations, owners and operators may be subject to air quality permitting requirements. Effective air permitting requires extensive practical experience in all aspects of air quality analysis and regulation. Trinity has completed more than 1,000 projects for Kentucky companies since the Covington office opened in 2004, including the following comprehensive air quality services:

- ▶ New Source Review (NSR) Permitting
  - Permit applicability analyses
  - Prevention of Significant Deterioration (PSD) applications
  - Air quality modeling analyses and control technology evaluations
  - Permit negotiations, amendments, and modifications
- ▶ Construction and Operating Permits
  - Initial applications
  - Title V and Conditional Major renewal applications, permit amendments, and modifications
  - Administrative, Minor, Significant, Off-permit, and Section 502(b)(10) changes
- ▶ Emission Inventory Surveys
- ▶ Kentucky Compliance Reporting
  - Malfunction reporting
  - Monitoring and deviation reporting
  - Compliance certifications
- ▶ Regulatory Compliance Reporting - NSPS, MACT/GACT, and GHG
- ▶ Support in planning, execution, and follow-up of emission testing
- ▶ Air Dispersion Modeling
  - Kentucky criteria pollutant modeling
  - Kentucky air toxics modeling
  - National Ambient Air Quality Standards (NAAQS) and PSD Increment modeling
  - Class I area impacts analysis
  - Regional haze and mesoscale dispersion modeling
- ▶ Compliance Auditing



## Agency Relationship

With our extensive air quality permitting experience in Kentucky, Trinity has earned a respected reputation that is critical when negotiating with the Kentucky Division for Air Quality (KDAQ). We maintain close contact with agency personnel who review our clients' permit applications throughout the project to track progress and respond to questions immediately. Trinity is also an active member of the Kentucky Chamber of Commerce and participates on its Energy and Environment committee.

## Odor Expertise

Various industries ranging from chemical to general manufacturing can be the recipients of odor complaints and it is critical for them to be able to adeptly remediate these complaints. Unlike many other states, Kentucky's regulations formally address odor complaints, making it a more significant issue for Kentucky companies. Trinity's Kentucky staff are experienced in using the olfactometer, odor sampling methods, odor footprint dispersion modeling, and other techniques necessary to successfully identify and mitigate odor concerns at industrial sites.

## Compliance Auditing

As a result of our extensive permitting experience and in depth knowledge of Kentucky and Federal environmental regulations, Trinity is ideally suited to help Kentucky organizations with compliance audits. A comprehensive compliance audit helps ensure that all applicable regulations have been properly addressed and identify and resolve any problems in a timely manner. A compliance audit is also valuable as a means of assessing potential liabilities related to ownership transfer.

## Other Areas of Expertise

Trinity serves a broad cross-section of industries and, through our network of offices, is able to provide a wide array of EHS compliance support. In addition to those detailed above, Trinity's Kentucky office also provides consulting support in the following areas:

- ▶ Risk Management Program (RMP) support
- ▶ Emergency Planning and Community Right-to-Know Act (EPCRA) assistance
  - SARA 312 – Tier 2 reporting
  - SARA 313 – Toxic Release Inventory (TRI) reporting
- ▶ Waste reporting and compliance support

- ▶ Water permitting and compliance support
  - National Pollution Discharge Elimination System (NPDES) permits for direct discharges of wastewater
  - Pre-treatment permits for indirect discharges
  - Storm water permitting and SWPPP development for both construction activities (CGP) and industrial activities (multi-sector and individual permits)
  - Preparation of Spill Prevention, Control, and Countermeasure (SPCC) plans
- ▶ Control device evaluation and optimization

If you need assistance not listed here, please contact our local staff at the number provided below. We would be more than happy to answer any questions you have and point you in the right direction.

## Trinity Can Help

Our knowledge and experience gained from 45 years of supporting our clients with their EHS needs enables us to effectively assist organizations in addressing their compliance issues. For more information about how we can help your organization, please contact our Covington office at 859.341.8100.

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