

REGULATORY ASSISTANCE

EHS Consulting for Michigan 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.

Our Michigan staff are professionals with backgrounds in engineering and industry. They collaborate with Trinity's network of experienced consultants, engineers, meteorologists, toxicologists, and health and safety experts. Many have graduate degrees and professional certifications. This multi-disciplined staff enables Trinity to deliver the highest quality solutions, efficiently and cost-effectively.

With many years of experience serving Michigan companies from our office in Ann Arbor, Trinity is strategically positioned to assist with your critical environmental issues.



Our track record includes high profile projects for a wide range of industries:

- ▶ Agriculture
- ▶ Automotive
- ▶ Bulk Terminals and Pipelines
- ▶ Cement, Lime, Aggregates, and Mineral Processing
- ▶ Chemical Manufacturing
- ▶ Pharmaceutical Manufacturing
- ▶ Electric Power and Cogeneration
- ▶ Food Processing
- ▶ General Manufacturing
- ▶ Glass Manufacturing
- ▶ Iron and Steel Manufacturing and Foundries
- ▶ Oil and Natural Gas Production and Processing
- ▶ Pulp and Paper Manufacturing
- ▶ Secondary Metals Manufacturing

Environmental Expertise

Whether constructing a new industrial facility, expanding an existing facility, or modifying operations, your facility may be subject to environmental permitting and reporting requirements. Effective permitting requires extensive practical experience in project and regulatory analysis. Trinity has completed hundreds of projects for Michigan facilities, many for repeat, satisfied clients. Our project experience encompasses a wide range of service areas.

New Source Review (NSR) Permitting

- ▶ Permit applicability analyses
- ▶ Michigan construction permits and exemptions
- ▶ PSD & Nonattainment NSR applications
- ▶ Control technology determinations

Renewable Operating Permits

- ▶ Initial and renewal applications
- ▶ Permit amendments and modifications
- ▶ Compliance assistance, including annual and semi-annual compliance reporting
- ▶ Emission Inventory Questionnaires (EIQ)
- ▶ Annual Emission Reports (AER)
- ▶ Annual Compliance Certifications (ACC)

Air Dispersion Modeling

- ▶ NAAQS and PSD increment modeling
- ▶ Class I area impacts analysis
- ▶ Regional haze modeling



- ▶ State criteria and air toxics modeling
- ▶ Hazardous release modeling

Other Environmental Services

- ▶ Regulatory compliance support
 - Multimedia compliance auditing
 - CEMS reporting assistance
 - MACT and NSPS standards
 - Ozone depleting substance (ODS)
 - Risk Management Plans (RMP)
 - Process Safety Management (PSM)
 - SPCC and Facility Response Plans
 - Storm Water Pollution Prevention Plans (SWPPP)
 - Renewable Fuel (RFS2) support
 - Stack testing
 - Toxic Release Inventory (TRI)
 - Tier II Hazardous Chemical Inventory
 - TSCA Chemical Data Reporting (CDR)
 - Water quality discharge permitting
 - Waste management
 - ◆ RCRA Waste Minimization Plans
 - ◆ RCRA Contingency Plans
 - ◆ RCRA Closure
 - ◆ Beneficial Reuse and Alternative Fuels
- ▶ EMS and EMIS implementation
- ▶ Phase I/II Environmental Site Assessments
- ▶ Custom training courses
- ▶ Climate Change
 - GHG inventories and reporting
 - CDP and business sustainability
- ▶ Odor and noise studies
- ▶ Industrial hygiene exposure sampling
- ▶ Litigation Support

Trinity's extensive permitting expertise provides practical experience that is critical when negotiating with the EGLE. Trinity maintains close contact with EGLE personnel who review permit applications to track progress and respond to questions immediately, minimizing costly delays.

Air Permitting

New and modified air emissions sources must meet Michigan and/or federal NSR permitting requirements. Trinity assists with all aspects of construction permitting including emissions quantification, regulatory applicability analyses, control technology assessments, air dispersion modeling, and permit application preparation. We work closely with clients to develop an optimal and flexible air permitting strategy, relying on our extensive knowledge and experience with Michigan permitting and permit exemptions. When a permit is not required, Trinity documents the non-applicability analysis for the client's files.

Trinity has completed many Renewable Operating Permit (ROP) projects in Michigan, including initial permit applications, permit renewal applications, permit modifications, and related compliance

support. Trinity assists clients with developing applications to maximize operational flexibility while streamlining monitoring, recordkeeping, and reporting requirements. Trinity has extensive experience preparing annual and semi-annual ROP compliance reports.

Air Dispersion Modeling

Trinity is widely recognized for our skills in air dispersion modeling to support permit applications, compliance demonstrations, emergency response planning, and impact and feasibility assessments. Trinity has performed modeling analyses supporting air quality projects using various dispersion models such as AERMOD sanctioned by EPA and other regulatory authorities.

Regulatory Compliance Support

Trinity is well versed in providing air and other environmental compliance support. From annual TRI or Tier II reporting to SPCC and SWPPP support, the Michigan staff provides facilities with extensive compliance support for all environmental media.

To facilitate ongoing compliance demonstrations, Trinity has provided environmental data management tools for numerous clients. From simple log sheets, to SharePoint, to Excel/Access data tools, and commercial EMIS software, Trinity helps organizations streamline environmental compliance management and documentation.

Compliance Auditing

With in-depth knowledge of Michigan and federal environmental regulations, Trinity is ideally suited to conduct effective multimedia 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 you attain or maintain compliance.

Custom Training Courses

Trinity staff frequently provide custom training courses to meet environmental training needs. Michigan staff develop and deliver custom training courses on a wide range of Michigan and industry-specific topics.

Leak Detection and Repair (LDAR)

Trinity's Michigan team has many years of LDAR knowledge and experience. Trinity has established, maintained and managed multiple LDAR programs within numerous industries.

Trinity Can Help

Trinity has the experience and insight to provide intelligent solutions to environmental challenges facing Michigan industry. Our knowledge and experience make us an excellent partner for addressing these issues. For more information about how we can help your organization, please contact our Ann Arbor office at 734.474.7709.

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