

REGULATORY ASSISTANCE

EHS Consulting for Pennsylvania 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 air quality assistance in the areas of air permitting and compliance, regulatory applicability analyses, and air dispersion modeling.

Trinity excels in meeting the regulatory compliance and environmental management needs of clients within the state of Pennsylvania. Through the significant volume of Pennsylvania projects we have completed over the last decade, Trinity has developed good working relationships with contacts at Pennsylvania Department of Environmental Protection (PADEP), Philadelphia Air Management Services (AMS) and Allegheny County Health Department (ACHD) as well as a thorough understanding of the environmental issues faced by the industries within the state.

Trinity's clients strive to address environmental requirements in a way that ensures regulatory compliance while maintaining operational



flexibility and minimizing cost. Trinity helps our clients accomplish this objective with an approach that combines regulatory expertise, technical proficiency, responsiveness, and creative thinking. Our Pennsylvania staff consists of environmental 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 air quality consulting services to a wide range of industries in Pennsylvania, including:

- ▶ Cement, Lime and Aggregates
- ▶ Chemical
- ▶ Electric Power
- ▶ Glass Manufacturing
- ▶ General Manufacturing
- ▶ Iron and Steel Manufacturing
- ▶ Oil and Natural Gas
- ▶ Petroleum Refining
- ▶ Pipelines and Terminals
- ▶ Surface Coating

Pennsylvania Air Quality Expertise

Whether operating or constructing a new industrial facility, expanding an existing facility, or modifying operations, owners and operators may be subject to air quality regulatory requirements. Effective air permitting and compliance requires extensive practical experience in all aspects of air quality analysis and regulation. Trinity has completed more than 1,200 projects over the last 5 years for Pennsylvania industries, including the following comprehensive air quality services.

- ▶ Plan Approval Permitting
 - Permit applicability analyses
 - Prevention of Significant Deterioration (PSD) applications
 - Nonattainment New Source Review (NNSR) applications
 - Plan Approval amendments, modifications, and extensions
- ▶ Title V Operating Permits
 - Initial applications
 - Renewal applications, permit amendments, and modifications
- ▶ Emissions Inventory Reporting
- ▶ Pennsylvania Compliance Reporting
 - Malfunction and deviation reporting
 - Compliance certifications

- ▶ Dispersion Modeling
 - National Ambient Air Quality Standards (NAAQS) and PSD increment modeling
 - Class I area impacts analysis
 - Regional haze and mesoscale dispersion modeling
- ▶ Compliance Auditing
- ▶ Continuous Emissions Monitoring System (CEMS) and Stack Testing Support
- ▶ Ambient Monitoring

Air Permitting

Plan Approval Permitting

New and modified air emissions sources must meet Pennsylvania and/or Federal permitting requirements. Trinity can assist with all aspects of Pennsylvania permitting from RFDs to PSD/NNSR permitting, including emissions quantification, regulatory applicability analyses, control technology assessments, air dispersion modeling, and permit application preparation. Trinity has assisted Pennsylvania clients in a number of different industries, including cement, steel, lime, power and natural gas, with obtaining PSD/NNSR permits within the last ten years. Beyond Pennsylvania, Trinity has valuable recent experience working directly with U.S. EPA Region III personnel on complex NSR projects. Additionally, we routinely work through PSD/NNSR avoidance strategies with our clients. Our focus and core competencies in air quality enables us to have working knowledge of the nuances involved in this complicated permitting and the associated air dispersion modeling that may be required.

Title V Permitting

Since the inception of the Title V operating permit program, Trinity has completed numerous Title V operating permit projects in Pennsylvania. Trinity assists clients in developing Title V permit applications that increase operational flexibility while streamlining monitoring, recordkeeping, and reporting requirements.

Agency Relationship

With our track record, Trinity has achieved the practical experience that is critical when negotiating with PADEP and local agencies. We maintain close contact with agency personnel who review our clients' permit applications throughout the project to track progress and respond to questions immediately, even obtaining Plan Approvals for clients in less than three months. Often, we have worked with those personnel on previous projects, allowing us to resolve questions before the application is submitted.

Pennsylvania Compliance Assistance

Trinity assists its Pennsylvania clients with their multimedia compliance reporting obligations required under Pennsylvania rules and/or permits. Trinity has the expertise to prepare air quality malfunction, deviation, and compliance certification reports and CEMDPS monitoring reporting via PADEP's online GreenPort system. Trinity has also assisted numerous PA clients with their Tier 2, residual waste, and DMR reporting that meets PADEP expectations. Additionally, Trinity has provided support to clients in their NOV

negotiations with the PADEP's Enforcement Group. As a result of our extensive permitting experience and in depth knowledge of Pennsylvania and Federal environmental regulations, Trinity is ideally suited to help Pennsylvania industry with compliance audits.

Air Dispersion Modeling

Trinity is recognized nationally and internationally for expertise in dispersion modeling to support permit applications, compliance demonstrations, emergency response planning, and impact and feasibility assessments. Trinity has performed air dispersion modeling analyses supporting Pennsylvania air quality projects using dispersion models sanctioned by the PADEP, including AERSCREEN, AERMOD, and CALPUFF.

It has been Trinity's experience with recent PSD permit applications that modeling (specifically the new 1-hour NAAQS) is a significant challenge in obtaining a permit application. Trinity is dedicated to keeping up-to-date with the most recent modeling guidance from EPA and has local modeling staff to understand how different state agencies typically interpret this guidance. Trinity prides itself on developing modeling protocols and strategies that will be acceptable to the air quality modeling group in PADEP's central office and ACHD "the first time."

Trinity Can Help

Our knowledge and experience in Plan Approval permitting, Title V permitting, emissions inventories, air dispersion modeling, compliance reporting, and compliance auditing enables us to effectively assist organizations in addressing air quality issues. For more information about how Trinity can help your organization, please contact our Philadelphia office at 610.280.3902, or our Pittsburgh office at 724.935.2611.

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