

REGULATORY ASSISTANCE

EHS Consulting for Power Generators in Florida

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 environmental consulting services in the areas of permitting and compliance, regulatory applicability analyses and air dispersion modeling.

Established in 2007, Trinity's Orlando office is highly regarded as a quality-focused environmental firm with deep Florida insights. With staff across Florida, our team is comprised of talented professionals with engineering and meteorological backgrounds who 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.

Power Generation Experience

Whether constructing a new facility, expanding an existing facility, or modifying operations, power generation facilities may be subject to environmental permitting requirements and on-going compliance obligations. Trinity's Florida staff has substantial experience in the power generation sector and possesses extensive



knowledge of regulatory requirements and permitting procedures to effectively guide power generating facilities through the permitting process and subsequent compliance requirements. Our targeted environmental services include the following:

- ▶ Air Quality Permitting
 - Emissions quantification
 - Regulatory applicability analyses
 - Air dispersion modeling
 - Permit applicability analyses
 - Preparation of strategic permit applications including:
 - ◆ Prevention of Significant Deterioration (PSD)
 - ◆ Nonattainment New Source Review (NNSR)
 - ◆ State construction and operation permits
 - Title V operating permits
- ▶ Multimedia Environmental Consulting Services
 - RCRA permitting and compliance
 - Solid waste management and hazardous waste determinations and contingency plans
 - Dust hazard analyses
 - Industrial hygiene support
 - Spill Prevention, Control and Countermeasure (SPCC) Plan development and training
 - Stormwater and wastewater management permitting and training
 - Wetlands assessment
 - Risk Management Program (RMP) development
 - Noise monitoring and modeling
- ▶ Power Plant Siting Act (PPSA) Certifications and NEPA support
- ▶ Florida Compliance Reporting
 - Annual Operating Reports (AORs)
 - TSCA reporting
 - Title V annual and semiannual reports
 - Statements of compliance
 - EPCRA Reporting (Tier II/TRI)
- ▶ EHS Auditing
- ▶ Climate Change Support
- ▶ Training for EHS Professionals

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 air dispersion modeling, permit application preparation, and permit applicability determinations. Trinity has a reputation in Florida as the air quality experts that can provide solutions to challenging air quality needs including PSD, navigating source

obligation, PSD actual emissions calculation approaches, netting, BACT revisions, Best Available Retrofit Technology (BART) analyses, navigating National Emissions Standards for Hazardous Air Pollutants (NESHAP) standards, and other unique situations. 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 air dispersion modeling firm and can help navigate these standards that have become critical to project approval. Trinity is an expert on Class I modeling, air quality monitoring, meteorological data monitoring, modeling emission rates for precursors (MERPs), impacts to Air Quality Related Values (AQRVs), National Environmental Policy Act (NEPA) modeling, MOVES modeling for parking lots, etc. Furthermore, Trinity complements these services with ambient modeling services that have assisted our clients in preparing well-defined strategies and planning for capital projects.

Multimedia Environmental Services

To meet client needs, Trinity assists with multimedia regulatory requirements including:

- ▶ 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
- ▶ Resource Conservation Recovery Act (RCRA) permitting and compliance
- ▶ Hazardous waste contingency plans
- ▶ Dust hazard analysis
- ▶ Industrial hygiene support
- ▶ RMP audits and plan preparation
- ▶ Due diligence for mergers and acquisitions
- ▶ Noise monitoring and modeling

PPSA Certifications and NEPA Support

In addition to air and multimedia services, Trinity assists power generators in navigating Florida's complex power plant approval process. In a time of regulatory uncertainty for power plant investments, it is important to work with a service provider that can strategically assess the air, water, and land resources that are critical to your project. Our knowledge of new federal and state regulatory requirements enables power producers to develop strategic solutions which minimize environmental and economic risk.

Compliance Reporting and EMIS Support

Trinity routinely assists Florida clients with recurring compliance obligations, such as AORs, EPCRA Reporting, TSCA, SOC, and Title V and

NESHAP semi-annual reports. We are 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.

Audit Experience

Trinity is also respected for its 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, including CEMS/DAHS 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.

Climate and Energy Services

As climate change has emerged as a critical issue, Trinity has been at the forefront of developing comprehensive climate and energy management strategies for power companies. By assisting clients with voluntary sustainability initiatives, Trinity helps clients to articulate goals, implement recommended strategies, identify appropriate metrics for measuring ongoing progress, and evaluate and adjust in order to adapt to new and emerging requirements affecting the industry.

Professional EHS Training

Annually, Trinity offers more than 300 courses on a variety of air and environmental topics, including power-focused courses. Trinity delivers valuable training seminars on state air quality permitting requirements, environmental reporting requirements, hazardous waste training and GHG reporting. Furthermore, the Florida DEP recognizes Trinity's superior knowledge of air quality regulations, expertise, and experience in applying these regulations to everyday industrial needs, such that DEP annually requests that Trinity train DEP permit writers and regulators on Florida state air regulations and compliance.

Trinity Can Help

Trinity's power sector clients are served by experienced consulting professionals who collaborate on issues related to the industry to ensure that each project leverages the most current regulatory expertise. Whatever your environmental challenge, Trinity has the experience and insight to provide intelligent solutions to optimize environmental performance.

For more information about how we can help your organization, please contact our Florida office at 407.982.2891.

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