

## REGULATORY ASSISTANCE

### EHS Consulting for the Sugar Industry 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 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 sugar processing facilities. Our company-wide focus and dedication to environmental permitting and compliance gives us an unparalleled level of collaboration, experience, intelligence 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 sugar processing facilities – Trinity capitalizes on the diverse project exposure to bring additional insight and strategy to environmental compliance for these facilities.

### Trinity in Florida

- ▶ Established in 2007, Trinity's Orlando office is highly regarded as a quality-focused environmental firm with deep Florida insights. Although our office is relatively new, we have established ourselves as the highest quality environmental service provider in Florida. In addition to our core focus on air quality consulting, Trinity offers a wide range of complementary multimedia environmental expertise that enables robust strategic advice and total project benefits.
- ▶ Trinity hires talented professionals with engineering and meteorological backgrounds with advanced degrees and professional certifications. This talented and experienced staff brings nation-wide expertise to our office and diverse insight and ideas to the state in order to strategically plan for what's next in Florida. This allows Trinity to deliver high quality solutions efficiently and cost effectively.
- ▶ With staff across Florida and the Florida office based in Orlando, Trinity offers a high-level of responsiveness for same-day on-site service.
- ▶ Trinity has established intimate relationships with Florida's key state regulators and has experience working with all six DEP districts (including Tallahassee) and all eight local agencies. Trinity is highly experienced with the state's permitting process. In addition, Trinity has provided state-wide air training to DEP inspectors and permit engineers over the past four years and continues to provide this on-going training, giving Trinity additional insight on DEP's policy and goals moving forward.
- ▶ Trinity has nationwide experience and knowledge of new regulations and continuously shares our expertise with industry (e.g., MACT webinars, including NESHAP for Subpart DDDDD for Industrial-Commercial-Institutional Boilers and Process Heaters.) 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 sugar processing facilities, gives Trinity a deep understanding of this industry's needs and the effort required to obtain permits for new capital projects. In addition, our expertise in navigating complex permitting and compliance projects allows us to provide clear focus in assisting our clients with planned, cost-effective solutions.

## Trinity's Services

Trinity provides a variety of environmental permitting and compliance assistance to our clients. Highlighted below are some of the services we provide. We pride ourselves in providing high quality yet cost-competitive compliance solutions to our sugar processing 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 our ambient modeling services which 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 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 continuous emissions monitoring system (CEMS)/data acquisition handling system (DAHS) review for unique Florida permit conditions, to 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 in order to assist in required documentation and assessment of compliance status. Trinity annually assists clients with federal and state reporting such as Annual Operating Reports (AORs), EPCRA reporting (Section 312 and 313), Toxic Substances Control Act (TSCA), Statement of Compliance (SOC), and Title V and NESHAP semi-annual reports.

### EMIS

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

### Professional EHS Training

Every year, Trinity offers more than 300 training courses on a variety of EHS topics. 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 being requested to train DEP regulators is a true testament to our superior knowledge in state air quality permitting and compliance.

## Sugar Processing Experience

Whether constructing a new facility, expanding an existing facility, or modifying operations, sugar processing facilities may be subject to environmental permitting requirements and on-going compliance obligations. Trinity has extensive experience in permitting sugar processing facilities and working with state and local agencies to limit potential annual emissions. Trinity has assisted facilities with PSD major source permitting avoidance through strategic solutions for production capacity design and implementing air pollution control devices. Avoiding major source PSD permitting is advantageous to shorten the air permit application preparation and processing time, as well as avoiding potential challenges in PSD-required air dispersion modeling or control technology analyses.

We have completed approximately 100 environmental permitting and compliance projects for the following companies in the sugar processing industry:

- ▶ American Crystal Sugar Company
- ▶ American Sugar Refining
- ▶ C & H Sugar Company
- ▶ Cora Texas Manufacturing Company
- ▶ Crockett Cogeneration
- ▶ Delta Sugar Company
- ▶ Domino Sugar Corporation
- ▶ Hamakua Sugar
- ▶ Hawaiian Commercial & Sugar Company
- ▶ Hilo Coast Power Company
- ▶ Lihue Plantation
- ▶ Louis Dreyfus Imperial Sugar Refinery
- ▶ McBryde Sugar Company
- ▶ Osceola Products Company
- ▶ Southern Minnesota Beet Sugar Company
- ▶ Spreckels Sugar Company
- ▶ St. Mary Sugar Cooperative
- ▶ Sugar Foods Corporation
- ▶ The Amalgamated Sugar Company
- ▶ United States Sugar Corporation
- ▶ Western Sugar Cooperative

Highlighted below are some of our recent projects:

## PSD Permitting Assistance

Trinity has assisted the sugar processing industry with multi-pollutant PSD projects for new capital projects. As part of this effort, Trinity has assisted clients with navigating their permit and requested project schedules such that other portions of the plant are unaffected, which would have resulted in additional scope expansions and extended permitting timelines. Trinity has prepared air permitting strategies and provided recommendations to mitigate the risk for

triggering PSD for certain pollutants and increase the likelihood for successful modeling. These analyses included emissions calculation refinements and a control technology analyses for determining BACT. Trinity has performed air dispersion modeling, prepared the PSD applications, and provided clients post submittal assistance in order to acquire a permit quickly with the most operational flexibility.

## PM<sub>2.5</sub> Ambient Modeling

Trinity has performed exploratory PM<sub>2.5</sub> ambient modeling for meeting ambient air quality standards. This effort has assisted our clients with resolving uncertainty and developing strategies for addressing future capital projects. Trinity quantified PM<sub>2.5</sub> emissions from operations on-site and along with addressing background concentrations, provided the client an analysis summary and general risk and recommendations for compliance.

## Boiler MACT Compliance Assistance

Trinity has provided multiple sugar processing clients with Boiler MACT compliance assistance both in navigating the requirements and determining strategies for achieving compliance. As part of this effort, Trinity has conducted energy assessments for affected boilers and also covered some end-use systems. Trinity has provided these clients recommendations for energy conservation measures and the required energy assessment report.

## Dust Hazard Analysis

Trinity conducted a dust hazard analysis of industrial operations at a sugar processing mill. This effort entailed using a process hazard analysis approach in conjunction with guidance provided under various NFPA standards. Trinity conducted a systematic review of portions of the mill to identify and evaluate potential fire, flash fire, and explosion hazards. Trinity prepared a report of the findings and recommendations to achieve prevention and mitigation requirements of the standard.

## Partnering With Trinity

Trinity's sugar processing 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. Our consultants are well respected by local, state and federal environmental agencies and have allied with top tier environmental attorneys and service providers. Whatever your environmental challenge, Trinity has the experience and insight to provide intelligent solutions to optimize environmental performance.

## Trinity Can Help

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

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