



**Trinity Consultants** is a leading global environmental consulting firm that brings 50 years of experience providing services and solutions in the EHS Regulatory Compliance, Built Environment, Life Sciences, and Water & Ecology markets. Trinity has the technical expertise, industry depth, and specialized capabilities to help clients achieve their goals across the natural and built environments.

Well known for our in-depth experience in air quality regulations, we have expanded our capabilities to meet our clients' multimedia needs. Although our depth of services has evolved, we have never wavered in our commitment to air quality consulting and to providing accurate, timely, and professional service for our clients.

With more than 70 offices nationwide, Trinity is strategically positioned to assist with the critical environmental issues affecting all aspects of the pulp, paper and tissue industry. Trinity takes pride in understanding not only the regulatory issues and challenges affecting our clients' operations, but also in understanding their industry and the processes involved.

Trinity has extensive experience assisting the pulp, paper and tissue industry with its regulatory compliance and environmental management requirements, completing more than 1,400 projects for pulp, paper and tissue clients in the last 10 years.

## Air Quality Permitting and Compliance

Effective permitting requires extensive practical experience in all aspects of air quality analysis and regulation. Trinity brings this localized expertise to every project we engage in for our pulp, paper, and tissue clients. Our significant project and air dispersion modeling experience combined with our active participation in associations such as the National Council for Air and Stream Improvement (NCASI) and the Technical Association for the Pulp and Paper Industry (TAPPI) gives us the expertise to assist our clients with their environmental compliance needs.

Our experienced staff have backgrounds in engineering, environmental sciences, and meteorology. This diverse and multi-disciplined group of experienced professionals allows Trinity to deliver the highest quality solutions, efficiently and cost-effectively. Our areas of support include:

- Air Compliance support and EHS Compliance audits
- Air Dispersion Modeling (Air Toxics, Risk Assessments, etc.)
- Annual Emission Reports, Emissions inventories for:
  - Criteria pollutants
  - Hazardous Air Pollutants (including mercury)



- Emissions Monitoring Support
- Federal New Source Review (NSR) assessments and permitting support for:
  - Prevention of Significant Deterioration (PSD)
  - Nonattainment NSR
- Multimedia Permitting and Regulatory Support
  - NPDES, SPDES, SPCC and SWPPP permitting
- NSPS and NESHAP applicability analyses and compliance plans
- State (Minor) NSR regulatory analysis and permitting
- Title V operating permits
- Toxics Release Inventory (TRI) reporting and compliance
  - Including reporting, calculation review, necessary documentations, and support
- TSCA (Toxics Substances Control Act)
- Regional Haze Support
- Risk Management Program (RMP)

Trinity's strategic office locations are staffed by resident consultants with an intimate understanding of the state and local air permitting processes as well as strong working relationships with local regulatory agencies. We are positioned to provide responsive and knowledgeable support for ongoing compliance requirements, permitting and dispersions modeling assessments, and strategic planning for pulp, paper, and tissue manufacturers.

## Air Dispersion Modeling Expertise

Trinity is recognized nationally and internationally for our skills in conducting air dispersion modeling studies to support permit applications, compliance demonstrations, emergency response planning, and impact and feasibility assessments. Trinity has performed thousands of air dispersion modeling analyses in support

of air quality projects using dispersion models sanctioned by EPA and other regulatory authorities, including AERMOD, CALPUFF, CAMx, and accidental release models. We are also experienced in addressing some of the more controversial aspects of air dispersion modeling such as meteorological and background data completeness and selection, ozone impact analyses, secondary PM<sub>2.5</sub> formation and analyses, intermittent emission sources, etc. Our modeling experience allows us to provide state-specific insight for each project and to develop the most beneficial strategies based on client needs.

## Audit Experience

Trinity is known 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 you attain or maintain compliance. Trinity provides a full range of audit services from audit planning through implementation and closure of corrective action items and has teams experienced with auditing the complex regulatory requirements managed by pulp, paper and tissue mills.

## NSR/Management of Change (MOC)

For NSR (PSD and nonattainment) major sources, comprehensive MOC systems are necessary to ensure prospective projects/actions being considered by mill operations are appropriately assessed per the requirements of the NSR program. Trinity has extensive experience assessing proposed projects, managing the substantial data necessary to support complex emission increase calculations, and assisting clients with development of strategic permitting plans while addressing considerations such as operational flexibility, minimization of monitoring and recordkeeping requirements, and project schedules.

Moving from assessment to permitting, Trinity develops NSR avoidance and NSR major modification permits. Given the complexities of major NSR permitting actions, Trinity's local knowledge and pool of national experts facilitates a smooth permitting project. Trinity can assist in deconstructing issued construction permits and Title V permit special conditions and related environmental requirements, summarizing compliance tasks, identifying operations and environmental responsibilities to achieve compliance, analyzing compliance gap risks, and implementing the requirements into compliance management systems.

## Continuous Emission Monitoring System (CEMS) Support

Trinity's CEMS support encompasses CEMS program audits, including data acquisition and handling system audits, customized training, developing, reviewing and updating Quality Assurance

plans, assistance with monitoring equipment selection, CEMS and Continuous Opacity Monitoring System (COMS) trouble shooting and procedure development. Maintenance of CEMS is an integral part of any Quality Assurance and Quality Control (QA/QC) program and Trinity can assist in creating or updating facility maintenance programs to ensure maximum CEMS data availability. Trinity's experienced professionals have the expertise to help ensure your CEMS program complies with applicable regulatory requirements in an efficient and effective manner.

## Risk Management Program (RMP)

Many of Trinity's pulp, paper, and tissue clients are subject to Process Safety Management (PSM) and Risk Management Program (RMP) requirements for chlorine, chlorine dioxide, and other regulated chemicals. Our PSM services focus on creating an effective process safety culture, while achieving compliance, that covers the breadth and depth of the OSHA PSM regulation. Our experts understand the PSM/RMP crossover that occurs when a facility reaches RMP Level Three applicability, and work with our clients to create a seamless program that allows for both OSHA PSM and EPA RMP compliance. Our RMP expertise covers offsite consequence analysis ranging from simple to complex release scenarios and can leverage the Breeze Incident Analyst and ExDAM suite of modeling software.

## Why Choose Trinity

Trinity maintains a strong group of consulting professionals with extensive pulp, paper and tissue experience who collaborate and communicate frequently on issues related to industry to help keep you informed of important regulatory developments. Whatever your challenge, Trinity has the experience and insights to provide intelligent solutions to optimize air quality related environmental performance for our pulp, paper and tissue clients. Our knowledge and experience across a wide range of environmental issues make us an excellent partner for addressing these matters.

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

### CONTACT OUR TEAM!

For more information about how we can help your organization, please contact us.

**Trinity Dallas Office**  
P 800.229.6655

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