

STATEMENT OF QUALIFICATIONS

WATER QUALITY SERVICES



PROVIDENCE

WATER QUALITY SERVICES

Permitting and Compliance

Generally, construction or modification of an industrial facility with water discharge requires that a water discharge permit be issued or modified. Obtaining a water permit is typically a critical-path in any major construction project. Providence has successfully prepared complicated water permit applications and completed the permitting process within an extremely aggressive schedule. Depending on the scope of the project, these permitting services may include:

- Analysis of regulatory permitting requirements, applicability determination, and permit strategy development
- Assistance in site selection as it relates to water permit feasibility
- Permit Application Preparation on both USEPA and LDEQ Application Forms
- Performing water quality modeling on the discharge and receiving stream, calculation of both technology and water quality based effluent limitations
- New and Renewal of Minor source water permits, New and Renewal of Major source water permits, variances, permit appeals

To help clients maintain compliance with water regulations, Providence also provides the following compliance management services:

- Development of compliance programs for all applicable requirements, including compliance calendars, compliance tools, compliance manuals, and compliance training
- Preparation of all reports and plans required by the water quality regulations and NPDES permits including SWPPP, SPC/SPCC Plans and Emergency Response Plans
- Preparation of discharge monitoring reports, including Whole Effluent Toxicity Reporting, Toxicity Reduction Evaluations (TRE)
- Preparation of compliance reports, including construction permit progress reports, quarterly, semiannual, and annual compliance reports
- Compliance §316(b) regulations
- Integration of hardware and software for development of spreadsheet and database tools for reporting and data management related to discharge analyses and on-going compliance.

Monitoring and Assessment

Our water quality Monitoring and Assessment Services include:

- Wastewater and storm water field sampling
- EPA 1600 Series Clean Technique procedures for trace metal monitoring
- Water Quality modeling and mixing zone analysis

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- Total Maximum Daily Loads (TMDLs) and individual waste load allocations-technical analyses, modeling and negotiations

OUR WATER QUALITY PROJECT EXPERIENCE

This section of the SOQ focuses on the experience of the Providence staff and their ability to provide the services described in the previous section.

Permitting and Compliance

Providence has assisted its clients in obtaining necessary water permits for construction and operation of a wide range of facilities, ranging from small businesses to multi-billion dollar greenfield chemical manufacturing facilities. Providence staff has completed hundreds of water discharge permit application. The following list provides is a highlight of the experience of Providence and its water quality staff:

- Prepared a complete package of water permit applications for a multi-billion dollar greenfield chemical manufacturing facility in Louisiana. Performed extensive modeling for both discharge pollutants and intake water negotiations. Coordinated public outreach activities. Providence also prepared all other environmental permit applications and Environmental Assessment Statement (EAS) required by the state.
- Completed numerous water permit applications for construction of new facilities in multiple states, including wood processing plants, power plants, chemical plants, cement plants, refineries, pulp and paper mills, and tire manufacturing plants. Several of these permits were contested and Providence staff assisted clients in legal proceedings to resolve the permitting issues.
- Provided strategic advice to clients selecting sites for new construction, including permitting feasibility, water quality modeling, and projection of technology and water quality based permit limitations.
- Completed hundreds of minor source water permit renewal applications (initial, renewal, or modifications) in a wide range of industries.
- Assisted clients applicability of §316(b).
- Provided water regulatory compliance assistance to dozens of clients on an on-going basis. Assisted them with rule interpretation, applicability determination, periodic compliance reporting, and preparation and submittal of discharge monitoring reports.
- Developed compliance manuals and compliance calendars for multiple clients and conducted compliance training for their personnel.
- Involvement in the design and site selection process to ensure sufficient availability and the acquisition of water resources required for manufacturing operations
- Addressing potential discharge limitations and potential wastewater treatment impacts due to any process and regulatory limitations.
- Addressing issues related to technology-based effluent limits (TBELs) and water quality-based effluent limits (WQBELs).



Providence's involvement in Greenfield projects related to water quality issues has enabled our clients to identify and assure that sufficient water resources are available (through reconnaissance and negotiations) from water resource management agencies

Monitoring and Assessment

Providence routinely assists its clients in collecting and reporting of both effluent and ambient data for wide range of facilities, ranging from small businesses to multi-billion dollar greenfield chemical manufacturing facilities. Providence staff has conducted hundreds of dry weather and wet weather water sampling events. The following list provides is a highlight of the experience of Providence and its water quality staff:

- Providence has completed hundreds of outfall sampling events for all the National Pollutant Discharge Elimination System (NPDES)/Louisiana Pollutant Discharge Elimination Systems (NPDES) required effluent parameters and all priority pollutants required by the water quality regulations
- Providence has conducted numerous clean techniques procedures sampling events for trace metals for clients affected by the TMDL for Toxics in the Calcasieu Estuary
- Completed a significant amount of ambient monitoring for collection of data to be utilized in the development of a request for a water quality criteria/standards change through a Use Attainability Analysis, and collection of the data necessary to produce a water effects ratio.
- Completed a large number of ambient and outfall samples for use in development of Total Maximum Daily Loads

