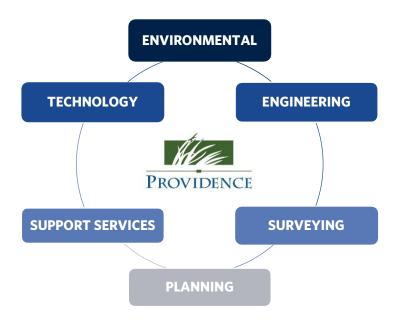
ABOUT PROVIDENCE

Providence has offered high quality engineering and environmental consulting services to our clients since 2000. Our firm is recognized for our high-quality staff, superior client service, professional integrity, and its values are aligned with its definition: *the act of providing or preparing for future use or application; making ready.* This preparation for the future implies growth, sustainability, and new opportunities - which our firm enthusiastically embraces.

Providence has experience in all aspects of engineering, regulatory analyses, permitting, modeling, monitoring, and compliance. Our engineers, environmental scientists, and environmental professionals have successfully solved complex engineering and environmental challenges since inception and owe our success to our emphasis on client relations, timely performance, strong project management, and a commitment to delivering quality deliverables.



Providence, an employee-owned company, began offering environmental consulting services to industrial clients in the Baton Rouge area. Through both acquisition and diversification, Providence now offers a much broader range of engineering and environmental services. We currently employ nearly 100 professionals with considerable knowledge and experience from within the commercial, academic, consulting, industrial, and regulatory fields. Our professional personnel have worked with numerous local, state, and federal government entities, including the Coastal Protection and Restoration Authority (CPRA), the Louisiana Department of Environmental Quality (LDEQ), the Louisiana Department of Transportation and Development (LDOTD), the Texas Commission on Environmental Quality (TCEQ), the North Central Texas Council of Governments, the United States Army Corps of Engineers (USACE), the Environmental Protection Agency (EPA), and the Federal Emergency Management Agency (FEMA), among many others.

We further serve a client base that includes many multinationals in a wide range of industries. Altogether, Providence has provided comprehensive professional engineering and environmental consulting services to over 500 clients in public and private sectors across the U.S. In Louisiana, our firm has worked with more than 50 cities and parishes across the state.



THE PROVIDENCE COMMITMENT TO QUALITY

Providence offers superior expertise and leadership, innovative solutions, and exceptional workmanship.

Quality service is imperative at Providence and is achieved by individuals performing work carefully and in conformance with project requirements and standard field/office procedures. A series of reviews are made at various stages of design to ensure the work is being developed according to the project's requirements. Through proactive communication and teamwork, cost escalations and overruns are minimized.

Providence has experienced significant growth over the years. We feel this reflects our commitment to providing quality services. For us, personal and professional integrity and competence are a must. It is a set of values reflected in our name, our vision, and our mission.

OUR CULTURE

VISION Providing for the future...our clients, our employees, our communities.

MISSION Providence's mission is to focus on our clients' best interests now and into the future. This focus is sustained by employing the best people to provide the highest quality services, with innovation and integrity.



A PROMISE TO HEALTH AND SAFETY

Protecting the health, safety, and well-being of our employees and the community is a core value of Providence. We provide a safe workplace, and our employees share the company's goal of ensuring operational safety and reliability. We believe all incidents and injuries are preventable and our safety policy stresses commitment to employee health and environmentally sound protocols. This policy also emphasizes procedures that provide a safe and protected working environment for employees, those who work on our behalf, and our neighbors. Providence is committed to operational excellence and a work environment that is incident and injury-free.

OUR AIR QUALITY EXPERTISE

Providence is committed to lifting some of the air quality regulatory burdens for our clients by developing compliance strategies and technically-sound solutions. Whether you face a permitting issue, a dispersion modeling challenge, or an emission control problem, our dynamic team of air quality professionals has solutions. This expertise includes experience in industrial settings as well as in governmental regulation, with several our staff having been former members of state environmental regulatory agencies.

AIR QUALITY PERMITTING, COMPLIANCE, AND SUPPORT SERVICES

Providence provides air permitting and compliance services to clients in a wide variety of industry groups such as crude oil refining, power generation, petrochemical manufacturing, solid and hazardous waste disposal, oil



and gas production, and metal fabrication. Our air quality services personnel include a diverse mix of engineers working alongside environmental scientists with a depth of experience in all areas of air permitting and compliance. Providence's permitting, compliance, and support services include:

PERMITTING

- Title V, Minor Source, Permit-By-Rule, Standard Permits, Nonattainment New Source Review (NNSR), and Prevention of Significant Deterioration (PSD)
- Best Available Control Technology (BACT) & Lowest Achievable Emissions Rate (LAER)
- Pollution control device selection
- Design & regulatory support
- Air quality dispersion modeling

COMPLIANCE

- New Source Performance Standards (NSPS)/National Emission Standards for Hazardous Air Pollutants (NESHAP)/Maximum Achievable Control Technology (MACT) compliance support
- Greenhouse gas (GHG) management
- Emission calculations and emission inventories
- On-site placement
- Enforcement negotiations
- Audit support

SUPPORT SERVICES

- Risk Management Plan development
- Litigation support
- Expert witness
- Contested case hearings
- Combined permitting and compliance strategy
- Feasibility analysis
- Custom compliance solutions

AIR QUALITY MEASUREMENTS

Providence is a leading air quality measurement service provider. Our measurement service offerings in one of the fastest growing industrial regions makes our air quality personnel some of the most knowledgeable professionals available. Providence provides both ambient and source air quality measurement services. Ambient measurement services include installation of stationary, as well as semi-mobile and fully mobile air monitoring stations. Source monitoring services includes Continuous Emission Monitoring Systems (CEMS) installation, operation, and maintenance. Providence's measuring services further include emission surveys using specialized leak Infrared Camera detection equipment for fugitive and point source volatile organic compound (VOC) sources. Providence has a large integration and assembly facility used to custom





build air monitoring platforms to meet the specific needs of our clients. We can provide components or services to cover part of a client's project, or we can offer these services as a turnkey project (including conceptual and final design, fabrication, installation, commissioning, and operations). This includes:

AMBIENT AIR MONITORING & METEOROLOGICAL INSTRUMENTS

- Fixed monitoring stations
- Mobile monitoring systems; trailer-based, RV-based, and truck chassis-based systems

SOURCE EMISSION MONITORING: CONTINUOUS EMISSION MONITORING SYSTEMS (CEMS)

- Sulfur Dioxide (SO₂)
- Nitrogen Oxides (NO_x)
- Carbon Monoxide (CO)
- Opacity
- Total hydrocarbon
- Flow
- Non-criteria pollutants such as total reduced sulfur (TRS), speciated VOC, mercury, etc.

DATA ACQUISITION SYSTEMS

- Data analysis and visualization tools, including real-time web-based wind trajectory, pollution rose or scatter plot, time series plot, etc.
- Assistance in compliance stack testing, including identification of testing requirements, selection of testing methods, development of test protocol or plans for trial burn, risk burn, and Comprehensive Performance Test (CPT)
- Development of test/monitoring methods using gas chromatography (GC), Fourier Transform Infrared Spectroscopy (FTIR), and other analytical instruments
- Development of LDAR3 for fugitive emission monitoring

AIR QUALITY DISPERSION MODELING SERVICES

Providence/Oris specializes in providing a holistic solution for clients' air quality needs by pairing its modeling expertise with the most efficient, effective, and powerful graphical user interfaces available for dispersion modeling, BEEST. As part of its air quality dispersion modeling services, Providence/Oris aids clients



in optimization of operating parameters to ensure compliance with all relevant air quality standards, while providing maximum flexibility in facility operations. As part of these services, Providence/Oris provides "whatif" modeling services to determine the potential effects of proposed facility modifications while still in the initial planning stages. This allows clients to make necessary adjustments early in the planning process, saving time and money in the long run. The BEEST Suite of programs provides the support needed to complete a wide range of air quality dispersion modeling analyses. This product line was custom developed to match the environmental industry's unique needs.

MODELING SERVICES

PSD regulatory modeling



- State implementation plans (SIP)
- Meteorological data collection and processing
- Federal Class I area regulatory modeling & long-range transport dispersion modeling
- Dispersion modeling consulting services
- Custom programming and software services
- Custom air dispersion modeling training

BEEST SUITE

- BEEST: graphical user interface for AERMOD and AERSCREEN, used to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) and PSD Class II Increment standards
- Professional CALPUFF: Assess long range transport of pollutants and their impacts on Federal Class I areas and long-range transport dispersion modeling
- Risk Management Plan (RMP) Modeling
- SLAB: Dense gas release modeling (e.g., most 112(r) modeling scenarios)
- SCREEN3: Analyze single source release scenarios over simple or complex terrain.
- BEESTXpress: High speed cloud-based processing for AERMOD runs

RELEVANT PROJECT EXPERIENCE

Providence has extensive experience in **PERMITTING GRASSROOTS FACILITIES**, possessing the required attention to detail, knowledge of public and agency concerns, knowledge of latest technologies to minimize emissions and pollution, and the commitment to project schedules and deadlines.

In addition to typical regulatory permitting and compliance assistance, Providence has worked with clients in the early stage of construction projects, such as **SITE SELECTION AND CONCEPTUAL DESIGN** that incorporates sustainability strategies (resource minimization, pollution prevention, or waste minimization).

For **SITE SELECTION**, Providence has identified advantages and disadvantages for multiple sites based on natural resources, area air quality classifications, and nuances in permitting requirements. Providence has performed air quality modeling analyses to assess level of challenges to meet air quality standards at each candidate site, advised the size of property to be acquired, and recommended proposed facility layout. This front-end work reduces the challenges in the permitting process and minimizes the risk of commitment on property acquisition.

In the **CONCEPTUAL DESIGN PHASE**, Providence has assisted clients in process design. Examples of this assistance include:

- A process design change that reduced the wastewater effluent discharge, reduced odor from wastewater streams, reduced VOC emissions by 98%, reduced NO_x emissions by a two-stage combustion control system, and recovered waste heat to generate steam for the facility
- A process design that used a chemical reagent to scrub ammonia from air vents and the resulting product was incorporated into one of the facility's products
- A recommendation reduced SO₂ emissions by 90%. The strategy received a **Prevention of Significant Deterioration (PSD)** permit for construction before a competitor took the same approach, capturing the



rare window of opportunity in the market, generating profit to offset the cost for SO₂ control, benefiting the environment, and creating goodwill with the community

PROJECTS, from site selection analyses and construction to operation and compliance. Our experience in this area includes working with American- and foreign-based companies who may be new to federal and state regulations. We have developed skills for presenting environmental permitting regulations in a way that is easy to understand, regardless of environmental permitting knowledge. Providence has constructed a general permitting matrix for companies considering new facilities in Louisiana, and we have experience working with clients who propose implementing first-ever manufacturing processes, as well as clients who have proposed using first-ever technology for production. This experience is beneficial in discussions with permitting authorities throughout the permitting process, providing requisite information while maintaining a certain degree of confidentiality of business plans. Further, through our experience, we have helped clients avoid the typical pitfalls and obstacles that occur with grassroots and expansion projects. To further demonstrate Providence's experience with grassroots and expansion projects, the following project summaries are provided.

SHINTECH LOUISIANA, LLC

Site Assessment through Operation



RELEVANT TASKS

- Section 10/404 wetlands permit
- PSD/Title V air permits
- High-level air modeling
- Inter-precursor trading modeling
- Water/Wastewater permitting
- Storm Water permitting
- SWPPP development
- Site-wide air modeling for fence line air standards compliance
- Hazardous waste permitting

Providence conducted all environmental activities required for the construction and operation of a \$2 billion chemical manufacturing facility in Iberville Parish, Louisiana. Since initial facility permitting, Providence has continued to coordinate all environmental activities for ongoing compliance, facility expansions, and new facility additions. With the most recent new facility permitting, Providence conducted the first inter-precursor trading (IPT) modeling, and only IPT modeling completed to date, in Louisiana involving a high-level of interaction and coordination with the state regulators.

PROJECT SUCCESSES

- Avoided permitting obstacles presented by 316B
- Obtained emissions reduction credits
- Obtained Section 10/404 wetlands permit despite culture resource issues

Shintech Louisiana, LLC (Shintech), owns and operates Shintech Plaquemine Plant 1 (SPP-1), which includes Chlor-Alkali, Vinyl Chloride Monomer (VCM), and Polyvinyl Chloride (PVC) manufacturing units, as well as a Resource Conservation and Recovery Act (RCRA) permitted Hydrochloric Acid Production Furnace (HAPF) and supporting infrastructure such as utilities and product handling/shipping operations. Shintech Plaquemine Plant 2 (SPP-2) includes the addition of a second Chlor-Alkali unit,

VCM unit and HAPF, with associated infrastructure. Shintech Plaquemine Plant 3 (SPP-3) includes the addition of a third Chlor-Alkali unit and VCM unit as well as a fourth HAPF and associated infrastructure. Shintech Plaquemine Ethylene Plant 1 (PEP-1) is an ethylene manufacturing facility within the Shintech Plaquemine Plant (SPP) Complex that provides ethylene to SPP-1, SPP-2, and SPP-3.



The initial plant, SPP-1, initiated construction in Fall 2005. In 2007 this project was expanded to permit additional plant facilities now known as SPP-2. In 2014, Shintech was permitted to begin construction of a new ethylene manufacturing facility, PEP-1. In 2018, the site was expanded to add SPP-3 facilities. The SPP-3 project required IPT modeling to authorize the use of nitrogen oxide emission reduction credits to offset new emissions of volatile organic compounds. In 2020, the site was expanded again to incorporate a new PVC production unit at the SPP-3. The SPP-3 expansion project also required IPT modeling. With each expansion project, Providence addressed nonattainment new source review and prevention of significant deterioration (PSD) requirements, including emission reduction credit (ERC) and air dispersion modeling requirements. Each project required an extremely fast-paced schedule and excellent working relationships with the state and federal regulators to obtain the required permits in time for target construction dates. Each expansion and new facility addition involved New Source Review (NSR) permitting and agency coordination to meet rigorous project deadlines. Providence continues to manage and service all Shintech's ongoing environmental and permitting needs.

Providence's responsibilities included:

- Phase I & II Environmental Due Diligence Site Assessments
- Clean Air Act Part 70, Title V, PSD, New Source Review, water quality assessments and LPDES industrial wastewater and construction stormwater permits, and RCRA Subtitle C "Part B" hazardous waste management permits
- State of Louisiana "public trust doctrine" Environmental Assessment Statement
- State of Louisiana environmental risk assessment ("RECAP")
- State of Louisiana groundwater protection certification
- Federal Clean Water Act wetlands delineation & Section 404 USACE permitting
- Federal threatened and endangered species protectiveness reviews
- SPCC plan/SWPPPs for construction and operational phases
- CAA chemical accidental release/risk management plan (RMP)
- RCRA hazardous waste management plan
- NHPA Section 106 Cultural Resources Phase I, II, and III assessments, surveys, and archeological data recovery
- Public participation, including public meetings, public hearings, and community outreach

Startup to Ongoing Compliance Maintenance





Providence designed, prepared, and helped implement a **SHINTECH ENVIRONMENTAL COMPLIANCE PROGRAM** to ensure compliance with all applicable environmental permits and regulations. Upon reviewing all applicable environmental permits, laws, and regulations, Providence prepared an environmental manager's compliance manual, various operator compliance manuals, an emergency and unauthorized notification/reporting manual, facility startup checklist, regulatory compliance tables, an environmental regulatory compliance calendar, and a full environmental compliance training program.

A **startup checklist** was designed as a compliance tool for the first six months of operation. Development of this checklist involved a detailed review of permit limits, interviews with site personnel and equipment vendors, review



of the CEMS, and discussions with regulatory personnel to identify potential scenarios that could occur during the first six months and impact emissions from the facility. This checklist identified operating scenarios and corresponding ranges of operation that were within permit limits and included all testing, reporting and notifications required prior to and during the first six months. The manual also addressed steps to be taken should operations approach those limited by permit conditions.

The **environmental manager's compliance manual** was developed to provide procedures for regulatory compliance and outlined the action items required by environmental permits and regulations associated with applicable regulatory agencies. The manual addressed permitting and compliance issues for all media as well as miscellaneous pre-construction environmental issues, including wetlands related permitting, construction stormwater permitting, etc. This included, but was not limited to monitoring, sampling, recordkeeping, and reporting required by the various permits and regulations. The manual included example forms, certain regulations and copies of applicable permits. This manual **served as a reference for plant personnel with environmental responsibilities to use when learning how to complete a task and ensure regulatory dates were met upon completion.** It also addressed facility changes that could prompt a regulatory review, requirement, or permit modification.

Providence also developed **operator's compliance manuals**, which summarized environmental/regulatory tasks and activities. These activities were documented in manuals prepared for each operational area and included directions on **environmental compliance tasks and procedures for correct documentation**.

An **emergency and unauthorized discharge notification/reporting manual** was prepared to provide reporting requirements and instructions in the event of a spill, unauthorized release, or upset. The manual included flow diagrams that enabled the environmental manager to quickly respond to unplanned events.

In addition, **regulatory compliance tables** were prepared that provided an abbreviated overview of all tasks required by the environmental regulations, laws, permits, and plans applicable to the facility. To accompany these tables, an **environmental compliance calendar** was prepared in a user-friendly, visual format. Delivered in a wall calendar format, it could be placed on the wall in personnel offices with reporting responsibilities. Finally, a **compliance training program** was prepared, and **training sessions** were held to increase overall environmental requirements and responsibilities.

TRAINING SESSIONS

- Overall Environmental Awareness
- Storm Water Pollution Prevention/Spill Prevention and Control
- Risk Management
- Emergency and Unauthorized Discharge Notification/Reporting Procedures
- Waste Management
- Water Permitting
- Continuous Monitoring for Air Quality
- Leak Detection and Reporting



FLOPAM, INC.

SNF

RELEVANT TASKS

- Wetlands Section 404 permit
- PSD / Title V air permits
- Wastewater permitting
- SWPPP Development

PROJECT SUCCESSES

- Obtained water permit within a demanding schedule
- Avoided pitfalls presented by community concerns
- Used key agency relationships to obtain Section 10/404 wetlands permit by a set time
- Received favorable comments from community due to outreach program

Flopam needed Providence's experience in United States environmental regulations to evaluate, permit, and operate their proposed facility in Louisiana. Providence coordinated natural resource- and water-related permits required for the construction and operation of a polyacrylamide production facility in Plaquemine, Louisiana. Flopam's facility required construction immediately adjacent to and crossing a federally maintained flood protection levee and barge dock on the Mississippi River. Lands adjacent to the Mississippi River in this area are known to have been inhabited by Native Americans and early Euro-American colonizers. Flopam enlisted GESI to direct the multimedia permitting process and assist with interaction and negotiation between the various state and federal regulatory and resource management agencies including LDEQ, USACE, EPA, USFWS, LDWF, LDCRT (State Historic Preservation Officer, SHPO), among others. GESI enlisted the services of Providence as a teaming partner with Louisiana-specific expertise.

Providence's responsibilities included:

- Phase I Environmental Due Diligence Site Assessment
- Multimedia permitting for air quality, industrial wastewater and construction storm water permits
- Federal CWA wetlands delineation and Section 10/404 USACE permitting and mitigation planning
- Federal threatened and endangered species protectiveness reviews
- SPCC Plan
- SWPPP
- CAA chemical accidental release/RMP
- Coordination of National Historic Prevention Act (NHPA) Section 106 Cultural Resources Phase I, II, and III assessments, surveys, and archaeological data recovery
- Assistance with preparation of an Environmental Assessment Statement, providing full responses to the required environmental impact questions
- Technical assistance for and coordination of public participation, including public meetings and public hearings

Providence took the lead in all aspects of **community relations**. This included an adjacent minority community that the client was interested in buying out to avoid potential environmental justice claims. Our representative negotiated with each landowner, homeowner, and resident to obtain an equitable buyout of the adjacent community. Providence also acted as Company Representative in meetings with community leaders, elected officials, and environmental justice organizations. Providence further functioned as Company Representative in all public meetings and public hearings. Our communication across this broad range of stakeholders allowed us to manage expectations and create allies throughout the community. This resulted in **numerous favorable**



comments from the full range of stakeholders (including the environmental justice community) during the public hearing for the PSD/New Source Review/Title V Air Permit. No negative public comments were received by LDEQ during any of the environmental permitting public comment periods for this facility. This **project was completed on a fast-track schedule** that required excellent working relations with state and federal regulators to obtain required permits in time for the June 2010 target date for commencement of construction. Environmental permitting of the facility was expedited with regular communication with LDEQ during preparation and review of the applications.







Louisiana Green Fuels LLC

LOUISIANA GREEN FUELS, LLC

PROJECT SUCCESSES

- Overcame logistical issues presented by original facility design by writing flexibility options into permits
- Strong communication despite cultural and language barriers
- Successfully educated agencies and the public while maintaining confidentiality of a manufacturing process new to the U.S.

Providence coordinated and conducted all **environmental activities required for construction** of an Ethanol Production Facility, Louisiana Green Fuels, LLC (LGF), that decided to expand their ethanol production methods to the United States. The facility included a sugar cane mill as well as a new ethanol manufacturing facility. LGF hired Providence to support the multimedia permitting/authorization process, interacting, liaising, and negotiating with the various state and federal regulatory and resource management agencies. In addition to providing **technical assistance for and coordination of public participation**, Providence provided LGF with compliance tools to maintain compliance with applicable environmental regulations and permits.

Providence's responsibilities included:

- Phase I Environmental Site Assessment
- Wetlands delineation
- Preparation of letters of no objection
- Construction permits for stormwater discharges and SWPPPs
- Spill Prevention Control and Countermeasure Plan
- Application for coverage under the hydrostatic test general permit and LPDES individual industrial permit
- Environmental Assessment Statement and full responses
- Liaison/negotiator with LDEQ on effluent limits for the LPDES permit in accordance with Total Maximum Daily Loads (TMDLs) established on the receiving water body
- Assistance with wastewater treatment design and engineering
- Title V air permit application





DYNO NOBEL LOUISIANA AMMONIA, LLC



RELEVANT TASKS

- PSD/Title V air permits
- Air dispersion modeling
- Water/Wastewater permitting
- Stormwater permitting
- SWPPP development

environmental coordinated and conducted all permitting for the construction of a new ammonia production facility in Louisiana. Dyno Nobel Louisiana Ammonia, LLC hired Providence as the exclusive consultant to provide all environmental permitting needs for the facility. The production unit was constructed at a current manufacturing facility in Westwego, Louisiana. Providence provided expertise during the initial planning phases of the project design and layout, and coordinated with local, state, and federal authorities to obtain necessary air, water, and waste construction and operation permits. Providence's project management and organizational implemented a project schedule that ensured the desired startup date was met, and Providence was able to provide insight into potential obstacles to meet critical deadlines.

CALPINE CORPORATION



RELEVANT TASKS

- PSD/Title V air permits
- Air dispersion modeling
- Water/Wastewater permitting
- Stormwater permitting
- SWPPP development

Providence conducted the air permitting for construction and operation of a new electric power generation peaking facility. Calpine Corporation hired Providence as to provide all environmental permitting needs for the facility. Providence managed the preparation of the Title V and PSD air permitting applications including air quality modeling in accordance with NAAQS, Class I Increment, and Class II Increment standards for all pollutants, BACT analysis, and EAS preparation. Providence worked with local, state, and federal authorities to obtain necessary air and water construction and operation permits. Providence's project management and organizational skills designed a project schedule that ensured the desired startup date was met, and Providence was able to provide insight into potential pitfalls and obstacles to meet critical deadlines.

To further demonstrate Providence's experience with **AIR DISPERSION MODELING**, the following project summaries are provided.

SHINTECH LOUISIANA, LLC



Providence conducted an inter-precursor trading modeling using the Comprehensive Air Quality Model with Extensions (CAM_x), to support the client's proposal to use NO_x emission reduction credit (ERC) to offset VOC emission increases in the Baton Rouge Five-Parish Ozone Nonattainment area. Three separate modeling iterations were carried out, including the Attainment Baseline Case (ABC) to replicate the SIP ozone model, the Credit Baseline Case (CBC) in which the NOx ERC was added to the emissions inventory of the SIP model, and the Project Baseline Case (PBC) in which the proposed project VOC emission increases were added to the emissions inventory. Comparative analyses were conducted to compare the PBC and the CBC to



demonstrate that the proposed inter-precursor trading will not negatively affect the overall air quality or the attainment demonstration of the nonattainment area of interest. The modeling approach established the basis for the standard modeling procedure for future applications in the state.

MULTIPLE SO₂ INDUSTRY WORKGROUPS

Providence conducted air dispersion modeling to site ambient air monitors. This project involved review of existing air monitoring data and conducting air dispersion modeling of sulfur dioxide (SO₂) emissions from major sources in East Baton Rouge, West Baton Rouge, St. Charles, St. James, Jefferson, and Calcasieu Parishes to determine the potential ground level concentrations of SO₂. Providence coordinated efforts with multiple SO₂ industrial stakeholder's groups consisting of major industrial sources of SO₂ in various parishes throughout Louisiana to assist the Louisiana Department of Environmental Quality (LDEQ) in generating the data necessary for submittal to the United States Environmental Protection Agency (EPA) for attainment demonstrations with the 2010 SO₂ NAAQS. This effort included collection of modeling input data, air dispersion modeling, and meeting and coordination with the LDEQ and EPA Region VI.

ORION ENGINEERED CARBONS LLC



Providence conducted 1-hour SO₂ air dispersion modeling for two carbon black plants in Texas, as an internal evaluation against NAAQS standard. Creative strategies were applied to refine emission rates to meet the client's needs. Sensitivity tests for multiple scenarios were designed and performed. The modeling results were used to support the determination of new SO₂ monitoring sites.

OUR PERSONNEL

Detailed resumes for our Air Quality staff are on the following pages. Information includes a professional biography with education background and specific client experience with detailed summaries. Providence appreciates the opportunity to showcase our capabilities and personnel and looks forward to exceeding expectations.

