

COMPANY OVERVIEW

RTP Environmental Associates, Inc. (RTP) is a full service environmental consulting firm with a highly experienced technical staff of engineers, scientists, chemists, meteorologists, computer scientists and information specialists. RTP's philosophy is to provide our clients with high quality, responsive and cost-effective environmental consulting services.

RTP has extensive experience in the biofuels manufacturing sector. RTP's experienced staff has been providing turn-key permitting and compliance services for our clients leading to the successful construction and operation of more than 85 biofuel plants in over 20 States.

Our clients rely on RTP to provide expert permitting and compliance services including permit application preparation, agency liaison, regulatory interpretation, negotiating permits, agency inspection assistance, agency reporting and non-compliance deviation corrections. We have the experience and expertise to achieve project goals, even under the most complex situations.

With seven regional offices throughout the United States, RTP is uniquely positioned to effectively assist with the environmental issues associated with all phases of construction and operation of biofuel manufacturing facilities.

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CORPORATE OFFICES



**AIR • WATER • SOLID WASTE
CONSULTANTS**

Environmental Services Biofuels Industry



RTP ENVIRONMENTAL ASSOCIATES, INC.

www.rtpenv.com

Environmental Permitting and Compliance is a major component of plant construction and operation. Environmental permitting is normally initiated during the planning stage of a proposed plant and continues through plant construction, start-up and facility operations for the lifetime of the plant.

There are several types of permits that are required to construct and operate a biofuel manufacturing facility. Many permits are regulated at both the Federal and State level, while others are mandated by the specific locality (County or Town) where the plant will be located. Although permitting requirements vary from State to State and further vary based on site-specific conditions presented, a core set of permits will be required.

In addition, timing is very important when planning your plant project. Some permits are necessary prior to construction, while others may not be required until operations have begun. Therefore, general permitting requirements are best explained using a 3-step timeline based on three phases: pre-construction, construction, and facility operations.

The following is a general guideline with typical permitting activities often needed to construct and operate a biofuel manufacturing facility.

RTP can assist with all listed activities.



Cardinal Ethanol, LLC

PRE-CONSTRUCTION

- Fatal Flaw Analyses to aid with site selection
- Due Diligence for Purchase of an Existing Facility
- Site Clearance Activities, including but not limited to:
 - Wetlands/Floodplains/Protected Streams Investigation
 - Archaeological/Historical Significance
 - Geology and Soils
 - Threatened/Endangered Species/Habitat
 - Potential Site Contamination
- Phase I Environmental Site Assessment
- Air Construction Permit Application including GHG emissions for both major and minor sources
- Storm Water Pollution Prevention Plan (SWPPP) Associated with Construction Activities
- Industrial Well Approval
- National Pollutant Discharge Elimination System (NPDES) Permitting
- NSPS Notifications

CONSTRUCTION

- Storm Water Pollution Prevention Plan (SWPPP) Associated with Industrial Activities
- Spill Prevention, Control and Countermeasure (SPCC) Plan and Facility Response Plan (FRP)
- Storage Tank (AST/UST) Approvals
- Hydrostatic Testing Discharge Permitting
- Risk Management Plans (RMPs)
- Special Air Permit Operating Plans (Control Equipment Operating and Maintenance Plan, Best Management Plan, Odor Control Plan, Fugitive Dust Control Plan, etc.)
- Alcohol and Tobacco Tax and Trade Bureau (TTB) Alcohol Fuel Plant (AFP) Applications
- NSPS Notifications

FACILITY OPERATIONS

- Air Operating Permit Application
- Agency Inspections and Recordkeeping (Air, SWPPP, NPDES, etc.)
- Air Permit Reporting (Operations Monitoring, Production Limits, Continuous Emissions Monitoring [CEM], NSPS Monitoring, Inspections and Reporting, Emissions Inventory, Deviations/ Non-Compliance, Testing Notifications, etc.)
- Leak Detection and Repair (LDAR) Compliance
- NPDES Discharge Monitoring Reports (DMRs)
- Hazardous Waste Generation (VSQG, SQG or LQG)
- Greenhouse Gas Emissions Reporting and Lifecycle Analysis (LCFS, RINs, etc.)
- Food Safety Modernization Act (FSMA) Compliance
- Environmental Compliance Assessment
- Toxic Release Inventory (TRI)
- Toxic Substances Control Act (TSCA) Reporting
- Tier II/III