



Environmental Regulatory Compliance Capabilities

REGULATORY COMPLIANCE SERVICES

Facilities that emit regulated pollutants, whether air, solid, or water, as part of their business operations are facing unprecedented demands to establish and maintain sound compliance programs. Focus draws upon the more than 30 years of process engineering, permitting, regulatory compliance, and in-plant operational experience to assist our clients in establishing and maintaining the most cost effective and technically sound compliance strategy.

Compliance Management
NSR/Title V/Minor Source Permitting and Emission Inventories
MACT/NESHAP/Permit Compliance Assessments/Audits
RCRA/TSCA Permitting

Air Permitting

Focus has experience in all aspects of air quality compliance projects promulgated under the authority of the Clean Air Act (CAA) and Clean Air Act Amendments (CAAA) of 1990. Focus personnel have successfully prepared and negotiated numerous construction and operating permit applications addressing Title V, New Source Review (NSR), Prevention of Significant Deterioration (PSD), and minor sources. Services include:

- Emission inventories
- Evaluations, assessments, and audits of compliance activities
- Regulatory review and compliance strategy development

- Preparing construction and operations permit applications including renewals and modifications
- Negotiating with regulatory agencies
- Participating in public hearings
- Conducting performance/compliance tests.

MACT Compliance

The CAAA expanded the National Emission Standards for Hazardous Air Pollutants (NESHAP) to include the performance-based standards known as Maximum



Achievable Control Technology (MACT). The MACT standards are based on the top 12.5% of performers for existing sources and the single best top

performer for new sources in numerous source categories. Facilities subject to the MACT standards of can find them particularly complicated and burdensome. Most require making equipment upgrades to meet the emissions standards, and all require performance testing to demonstrate compliance.

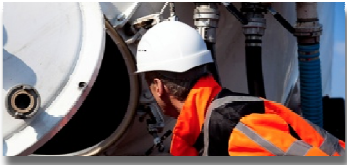
Focus is specialized in MACT compliance having particular experience with the Hazardous Waste Combustor (HWC) and Industrial, Commercial, and Institutional (ICI) Boiler MACTs. To ensure compliance with applicable regulations, Focus can assess a facility's existing program to identify gaps with MACT requirements and help the facility develop a MACT implementation program and compliance management system. We provide:

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- Site, facility, and source emissions characterization, quantification measurement or estimation, and impact evaluation
- Compliance evaluation and gap assessment
- Technical and economic evaluation of combustion and/or emissions control equipment options
- MACT compliance plans
- Personnel training on regulatory compliance aspects
- Compliance monitoring equipment and instrumentation performance evaluation
- Performance testing, start-up, and operational support of combustion and emissions control equipment.

Solid and Hazardous Waste Permitting

Focus has experience in all aspects of Resource Conservation and Recovery Act (RCRA) and Toxic Substances Control Act (TSCA) permitting and compliance. Focus personnel have prepared and negotiated RCRA Part B and TSCA permit applications including all required management plans; conducted air dispersion modeling; developed and performed risk assessment analysis; and managed trial burns of hazardous waste combustion systems. Focus also assists with closure activities. This experience has been instrumental in assisting clients with transitioning from compliance under RCRA to the HWC MACT.



emissions control equipment. Focus has provided services for hazardous waste incinerators, boilers, industrial furnaces, thermal desorbers, glass furnaces, aluminum furnaces, and cement kilns.

FOCUS HISTORY

Focus was established in 1988 and has successfully completed over 1,500 projects for more than 400 clients in the chemical, petrochemical, pharmaceutical, explosives, ammunition, metallurgical, biomedical, automotive, textiles, minerals, aluminum, and waste management service industries. In addition to work in these industrial sectors, a number of projects have been completed for site remediation contractors, utilities, and government agencies. These projects have been conducted throughout the United States in all 10 EPA regions, located in 47 states, and internationally in 21 countries.

DEMONSTRATED PROFESSIONAL QUALIFICATIONS

We offer our clients a unique blend of technical expertise, regulatory compliance insight, and practical hands-on operating experience. Focus staff includes experienced engineers and scientists with degrees in chemical, civil and environmental engineering, and in environmental science. All of Focus' engineers hold either PE or EIT certifications. Focus' senior principals average over 30 years of experience in the environmental field.

Please contact us if Focus can assist you with your compliance requirements.

COMPANY PROFILE

Focus Environmental, Inc. (Focus) is an employee-owned environmental engineering consulting firm located in Knoxville, Tennessee. Focus specializes in providing regulatory compliance for applications involving combustion, thermal treatment, and

Focus Environmental, Inc.

4700 Papermill Drive, Knoxville, TN 37909

Phone: 865.694.7517 • Fax: 865.531.8854 • Email: focus@focusenv.com • Web: www.focusenv.com