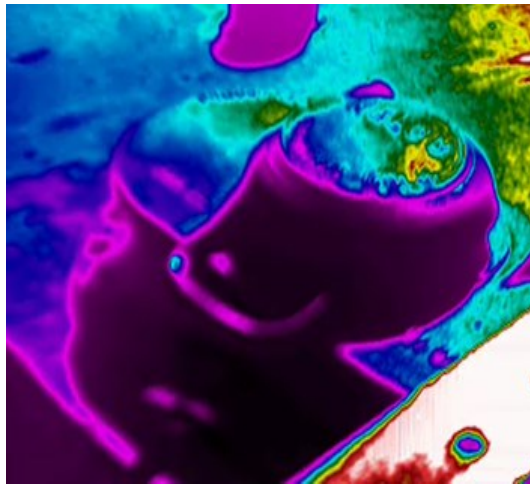




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Air Quality Permitting and Inspections

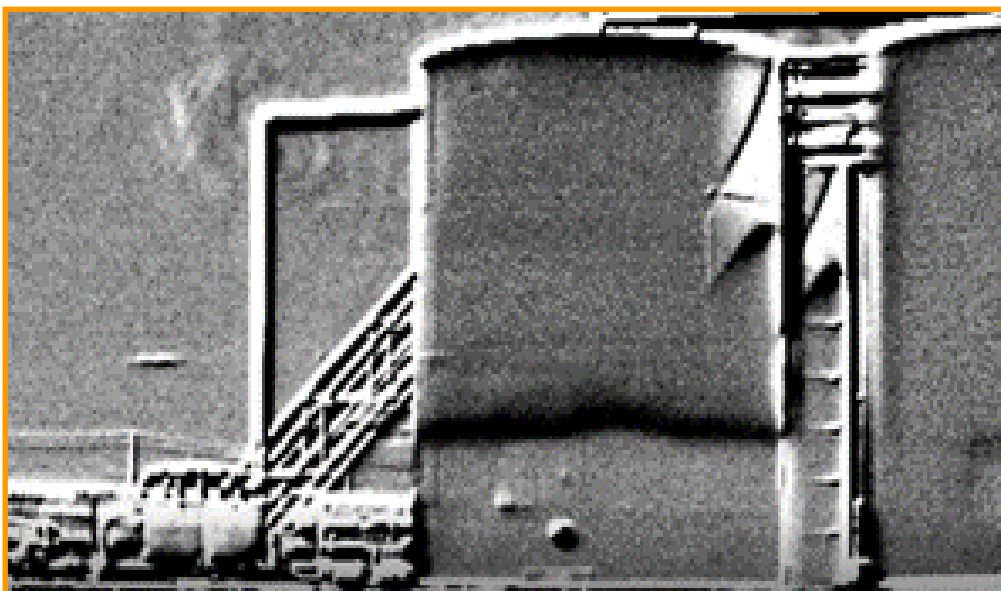
SARA Title III Emergency Planning
and Community Right-to-Know Act

Spill Prevention, Control, and
Countermeasure (SPCC) Plans

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Air Quality Services

- Air permitting (federal, state, local)
- Permit strategy development
- Emissions tracking and quantification
- Permit application preparation
- Compliance management tools
- Compliance and Self-Certification assistance
- Control technology evaluations
- Emissions Reduction Credit assistance



2DOT's LDAR Program

We facilitate the development and implementation of LDAR programs including the following services:

- Defining LDAR program and training requirements
- Acquiring equipment and providing the associated training
- Onsite repair capabilities for quick and efficient corrective action timeline and tracking
- Optical Gas Imaging (OGI), M21, M22 and Audio, Visual and Olfactory (AVO) Inspections
- Integration with multiple LDAR databases such as ACTS, LeakDAS, FEMS, and GuideWare
- 2DOT LDAR reporting system with client specific GIS based data management platform

Our LDAR experience includes applicability and compliance support for facilities subject to New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAPS), Maximum Achievable Control Technology (MACT) and state specific requirements, including but not limited to:

- NSPS – 40 CFR 60, Subparts VV, VVa, KKK, OOOOa
- NESHAP – 40 CFR 61 F, J, V, and FF
- MACT – 40 CFR 63, Subparts HH
- State and local LDAR Regulations
- RCRA – Subpart BB

SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT (SARA)

The Emergency Planning and Community Right-to-Know Act (Commonly known as SARA Title III) sets requirements for local and state emergency planning around hazardous chemicals, the right of the public to access information on chemical hazards in their community, and the reporting responsibilities for facilities that use, store, and/or release hazardous chemicals.

- A properly maintained MSDS library can be used to quickly create a chemical inventory, and is the first step to compliance.
- Four provisions:
 - Emergency Planning (Sections 301-303)
 - Emergency Release Notification (Section 304)
 - Hazardous Chemical Storage Reporting Requirements (Sections 311-312)
 - Toxic Chemical Release Inventory (Section 313)



TYPES OF SPCC PLANS

Any non-transportation facility with the potential to discharge oil to waters of the U.S., and who stores oil or petroleum products on-site in excess of 1,320 gallons, needs to prepare and implement a SPCC Plan.

- **Tier I SPCC Plan** – for facilities with less than 10,000 gallons capacity of oil and petroleum on-site
- **Tier II SPCC Plan** – for facilities with less than 10,000 gallons capacity of oil and petroleum on-site, but with at least one tank larger than 5,000 gallons capacity
- **PE-Certified SPCC Plan** – for facilities with more than 10,000 gallons capacity of oil and petroleum on-site
- Technical Amendments/Updates to existing SPCC Plans
- Five-Year Reviews of existing SPCC Plans

SPCC Plan is needed for:

- Any facility that stores oil or petroleum products in excess of 1,320 gallons (i.e., twenty-four [24] 55-gallon drums, or 31.4 barrels). Thus, even a site with no tanks, but with twenty-five (25) 55-gallon drums on-site storing oil or petroleum.

SARA Title III Chemical Inventory Reporting is needed for:

- Facilities with hazardous chemicals in quantities above certain thresholds



Qualifications:

- Professional Civil Engineer: WY, CO, and UT
- 40-hour OSHA HAZWOPER Training
- 10-hour OSHA Construction Industry Safety Training
- 8-hour OSHA Site Supervisor Training
- 4-hour OSHA Confined Space Entry Training
- Secondary Containment for SPCC Plan Training

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STORMWATER MANAGEMENT

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2DOT'S STORMWATER MANAGEMENT SERVICES

Pre-Construction and Engineering

- Stormwater Conveyance Design & Engineering
- Permit Submittals: Municipal, State, and COGCC
- Preparation and Design of SWMP/SWPPP with ESC Maps
- Amendments to Existing Plans

Construction Monitoring

- Weekly or Bi-weekly and Post-Precipitation Inspections
- BMP Installation, Maintenance, and Removal
- Vegetation Monitoring and Weed Management
- Groundwater Sampling and Reporting

Post-Construction Reclamation and Maintenance

- Reclamation: Grading, Seeding, Watering
- Final Stabilization Monitoring and Inspections
- Weed Management
- Permit Termination: Municipal, State, and COGCC



PURPOSE

Stormwater replenishes our aquifers and flows into streams and rivers. Heavy or contaminated runoff can cause stream bank erosion, habitat destruction, infrastructure damage, and downstream flooding. Our stormwater management solutions are meant to mimic natural hydrology and control infiltration into the ground.



BMPs & CONTROL MEASURES

Temporary and Permanent BMP Installation and Maintenance (Silt Fence, Straw Wattle, Inlet Protection, Rock Check Dams, etc.)

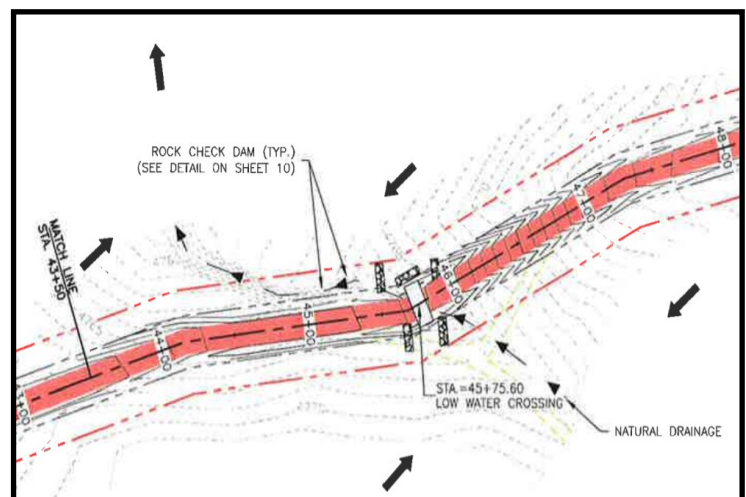
Temporary and Final Stabilization (Erosion Control Blanket, Surface Roughening, Seeding and Straw-Crimping, Hydroseeding, etc.)

DESIGN

- Engineered stormwater structure and conveyance design (drainage structures, rip-rap)
- BMP selection based on federal, state, and municipal standards
- SWMP/SWPPP: preparation and design including ESC maps
- Stormwater program audits and training
- Regulatory compliance inspections

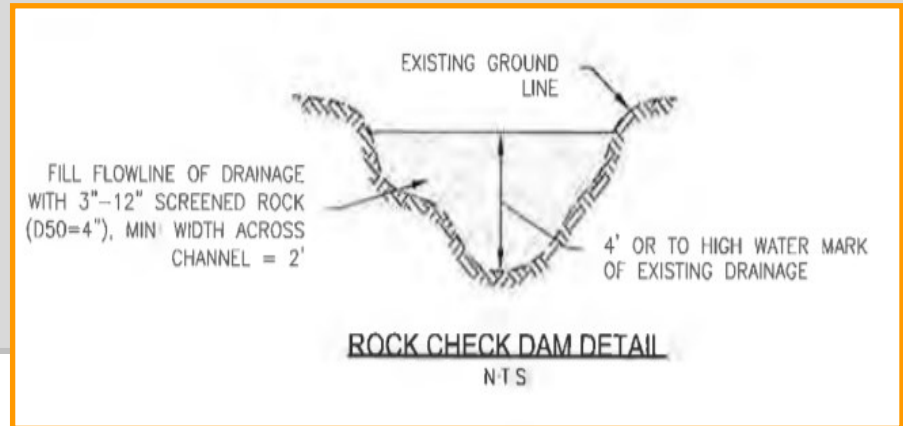
RESTORATION

- Stream embankment stabilization/restoration
- Landscape and planting plan design
- Seeding and planting



STORMWATER PROJECT EXPERIENCE:

- Large construction permits
- Municipal, transportation, industrial, and construction stormwater permits
- Commercial and residential development (5 - 500ac)
- Land development and site improvements
- SPCC plans and secondary containment
- Stormwater design/
grading plans
- Agency coordination
- Stream restoration
- Reclamation/
remediation



QUALIFICATIONS:

- Professional Civil Engineer: WY, CO, and UT
- CDOT SWMP Preparer Certification
- CDOT Transportation Erosion Control Supervisor (TECS) Certification
- 40-hour OSHA HAZWOPER Training
- 10-hour OSHA Construction Industry Safety Training
- 8-hour OSHA Site Supervisor Training
- 4-hour OSHA Confined Space Entry Training
- Colorado Association of General Contractors
- Erosion, and Sediment Control Inspector Training
- Secondary Containment for SPCC Plan Training

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WETLANDS AND 404 PERMITTING

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2DOT's Wetlands and 404 Permitting Services:

- Clean Water Act Section 404 Permitting
- United States Army Corps of Engineers (USACE) Coordination
- Delineations of Waters of the United States (WOTUS)
- WOTUS Jurisdictional Determination Requests
- Permitting Strategy Development
- Nationwide Permit (NWP) Pre-construction Notifications
- Individual (Standard) Permit Applications
- Mitigation Planning and Implementation



Regulatory — 2DOT's regulatory specialists maintain a strong understanding of the USACE NWP program, rules on permit processing, definitions of waters of the U.S., and other aspects of the 404 program. Our understanding of NWP terms and conditions help us to advise our clients in project approaches that can best minimize permitting hurdles and even help to avoid impacts to waters of the U.S.



Delineation of WOTUS

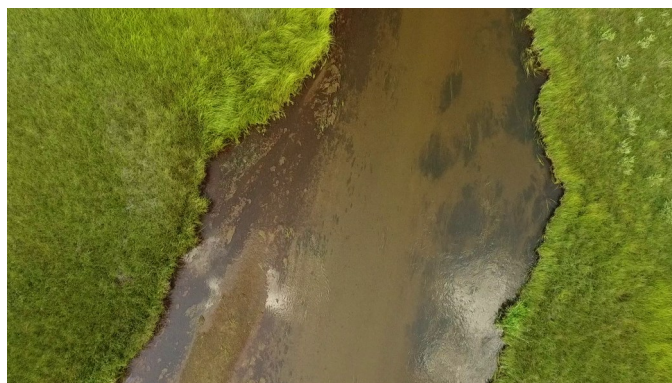
2DOT's biologists are expert wetland delineators. Our years of experience delineating wetlands and conducting vegetation surveys throughout the western U.S. provide us with the skills necessary to accurately delineate all types of wetlands, ensuring that your project will not be held up due to unanticipated USACE intervention. We have also delineated non-wetland waters of the U.S., from arroyos to ditches and urban stormwater management systems.

USACE Coordination & Permit Processing

Our in-depth knowledge of Section 404 permitting helps us to work well with USACE staff, which can also allow NWP verifications to be processed quickly. We can “clean up” complicated permitting negotiations started by less experienced regulatory specialists.

Mitigation Planning and Implementation

Our staff have designed and constructed numerous wetland and riparian mitigation projects in the west. 2DOT's staff is skilled and experienced at mitigation design, grading design, seeding, container stock design & procurement, soil amendments, logistics, construction management & supervision, and long-term vegetation monitoring.



Wetland and 404 Permitting Experience:

- On-call contractor for delineations of WOTUS and 404 permitting requirements for CO, UT, and WY projects
- Federal Emergency Management Agency (FEMA) stream restoration project located near Estes Park, CO
- 35-mile pipeline project located in Casper, WY
- Pipeline removal project located near Kiowa, CO
- Reservoir restoration project located near Pinedale, WY
- WOTUS investigation and determination for proposed energy development in the Piceance and Uintah Basin, UT

Qualifications:

- Wetland Training Institute 40-hour Wetland Delineation Training Certificate
- Soil Scientist Society of America Hydric Soils Workshop
- BLM Uintah Basin Rare Plant Surveyor Training
- Association of State Wetland Managers Active Member



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