

**Wendy K. Merz**  
**Director of Sustainability Services**  
**Principal Consultant — Philadelphia, PA**



## **AREAS OF SPECIALIZATION**

- ▶ Corporate GHG Footprints and Voluntary Reporting Support
- ▶ Sustainability/Climate Strategy Support and GHG Reduction Target Setting (Science-Based Targets)
- ▶ Life Cycle Analysis and Environmental Product Declaration Development
- ▶ EPA Mandatory Reporting Rule Reporting and Monitoring Plan Development
- ▶ 3<sup>rd</sup> Party Verification of GHG Inventories
- ▶ State Construction and Operating (Title V) Permitting with experience in PA, DE, NY, NJ, MA, CT, RI, WV and MD.
- ▶ PSD/NNSR Permitting and Avoidance Strategies
- ▶ NSPS/NESHAP (MACT and GACT) Applicability and Compliance for a variety of industry sectors/sources
- ▶ Extensive Project Management Experience including large multi-state pipeline projects in northeastern US. Strategic account management for cement and natural gas companies
- ▶ Regulatory Requirements for Stationary Engines
- ▶ NOV Response Strategies and Resolution
- ▶ Multimedia Experience including Storm Water Pollution Prevention Plans, TRI, Tier II, PA Residual Waste Reporting
- ▶ Past Member of PA Chamber Environmental Committee
- ▶ Currently member of Aluminum Association Climate Advisory Group and American Iron and Steel Institute Sustainability Committee

## **EDUCATION**

M.S., Environmental Engineering, University of Cincinnati  
B.S., Chemical Engineering, Lehigh University

## **SUMMARY OF EXPERIENCE**

Ms. Merz is Trinity's Director of Sustainability Services and a Principal Consultant. She has over twenty-two years of environmental consulting and project management experience, specializing in sustainability/ESG and environmental permitting and compliance. Her Sustainability/ESG experience includes corporate sustainability/climate strategic advisement, GHG reduction target setting, entity-wide carbon footprints and voluntary reporting, GHG Mandatory Reporting Rule compliance, and life cycle analysis (LCA) and environmental product declaration (EPD) development. She is also experienced in environmental regulatory compliance strategy development and permitting support. She is an experienced project manager of large projects with geographically diverse team members and client sites, and is an experienced presenter and instructor on sustainability and environment regulatory requirements.

Her air quality permitting and compliance experience includes regulatory compliance strategy development, air construction and operating permit application preparation, New Source Review, BACT and RACT evaluations, NSPS and NESHAP applicability and compliance and environmental training course development and instruction.

Ms. Merz has worked with clients representing a variety of industries, including natural gas, power generation, petroleum refining, cement manufacturing, lime manufacturing, steel manufacturing, secondary aluminum manufacturing, synthetic fiber manufacturing, food processing, asphalt manufacturing, and transportation services.

Ms. Merz graduated from Lehigh University with a Bachelor of Science degree in Chemical Engineering and from University of Cincinnati with a Master of Science degree in Environmental Engineering. Ms. Merz opened Trinity's Philadelphia Office in 2012 and managed the office for seven years.

## TECHNICAL EXPERTISE

**Sustainability Program and Climate Strategy Support, Green House Gas Emissions Inventory Development and Mandatory Reporting Rule Compliance.** Assisted in the development of corporate-wide baseline GHG emissions inventories (Scope 1, Scope 2, Scope 3) for several clients in accordance with the GHG Protocol Corporate Reporting Standard, The Climate Registry (TCR) Protocol and industry protocols such as the Natural Gas Sustainability Initiative (NGSI). Supported reporting to CDP and SASB for clients in natural gas, steel and transportation sectors. Provides ongoing support with corporate sustainability initiatives and climate strategy. This support includes benchmarking the client's business sustainability program against selected industry peers; gap assessment of existing corporate sustainability program elements: evaluating industry sector decarbonization initiatives; tracking emerging carbon policy and regulations; facilitating stakeholder meetings to assess viable GHG mitigation strategies; assessing risks and opportunities related to climate strategy and developing a matrix to assess \$/ton GHG and ranking options; establishing achievable science-based GHG reduction goals; assisting with messaging to internal stakeholders, including senior management and board of directors.

Assisted with EPA MRR implementation and developed GHG Monitoring Plans for several industry sectors including electricity generation, lime manufacturing, oil refining, steel manufacturing and general stationary combustion sources as well as for suppliers of natural gas.

**Natural Gas Industry Experience.** Assisted clients in the natural gas industry with permit applications in various states, including Pennsylvania, West Virginia, New York, Connecticut, Massachusetts and Rhode Island. Managed the preparation of a supplementary BACT analysis for a greenfield compressor station project in Massachusetts and provided expert witness testimony defending it to the Mass DEP Environmental Hearing Board in December 2020. Managed air permitting for major modernization project impacting compressor stations along a transmission pipeline throughout Pennsylvania and New Jersey. Managed large pipeline expansion project in northeastern US involving modifications to five compressor stations in three different states. Permit applications included new source review netting calculations, greenhouse gas BACT analyses, FERC and state modeling, and the review of Resource Report 9 air quality analyses. Provided climate strategy support to fully integrated natural gas company with operations including upstream E & P, midstream gathering, downstream transmission and storage, and distribution.

**Steel Manufacturing Industry Experience.** Permitted new pickling line at specialty steel manufacturing plant. Supporting corporate sustainability initiatives of a major US steel manufacturer by providing strategic advisement related to ESG reporting and preparing white papers on emerging topics. Provided 3<sup>rd</sup> party verification of corporate GHG Scope 1/Scope 2 emissions reporting. Provides strategic advisement on emerging carbon policy and decarbonization initiatives. Manages the development of several Environmental Product Declarations (EPDs) involving life cycle analysis (LCA) using the GaBi® software tool.

**Air Quality Permitting.** Experienced in preparing air permit applications for various industries and states, including Pennsylvania, Delaware, West Virginia, Maryland, New York, Connecticut, Massachusetts and Rhode Island. Application types include state construction permits including New Source Review (PSD/NNSR) as well as initial Title V permits, Title V renewals, and significant and minor modifications to Title V permits. Prepared permit applications for greenfield sites and plant modifications which include detailed regulatory applicability determinations, emissions quantification, and process flow diagrams of plant emission sources. Assisted a variety of clients with NSR avoidance strategies by developing extensive calculations and evaluating various NSR avoidance scenarios. Developed BACT/LAER/BAT analyses. Participated in pre-application meetings with state regulatory agencies to introduce permitting projects and

worked with clients to negotiate final permit conditions. Conducted extensive reviews of state-specific permitting applicability for stationary engine generators enrolled in demand response programs of various ISOs across the country including NYISO, ISONE, PJM, and ERCOT.

Worked with numerous Pennsylvania clients to comply with state RACT rules by developing case-by-case NO<sub>x</sub> and VOC RACT analyses for clients in the various industry sectors including power generation, natural gas transmission, lime manufacturing, secondary aluminum manufacturing, and steel manufacturing. Also managed projects assisting Pennsylvania clients respond to agency requirements related to the Data Requirements Rule (DRR) for the 2010 1-hour sulfur dioxide primary National Ambient Air Quality Standard (NAAQS).

**Utility Sector Experience.** Provided ongoing compliance support to waste coal-fired power plant in Eastern Pennsylvania for several years including Title V compliance and AIMS reporting, Tier II and TRI submittals, PA residual waste reporting, Title V renewal permitting, development of CEMS QA/QC plans and GHG monitoring plans, response to US EPA Section 114 requests and general environmental management system development and implementation. Provides ongoing support to Pennsylvania utility providing assistance with air quality compliance including the development of monitoring plans and compliance calendars for Boiler MACT, RICE MACT and Utility MACT. Assists with reviewing draft air permit language and drafting comments to the agency. Assists with review of new and pending regulations such as Utility MACT, CSAPR, PADEP's RACT2 Rule by providing white papers and synopses that summarize the impacts to the client.

**Cement Industry Experience.** Strategic account manager for large cement manufacturing company. Managed projects involving the preparation of air permit applications for kiln modifications, alternative fuels permitting, quarry equipment replacement and Title V renewals at cement and lime manufacturing facilities. Worked with several cement plants to develop Site-Specific Emissions Monitoring Plans, Performance Evaluation Plans and to update Operation and Maintenance Plans in accordance with the 40 CFR Subpart LLL (PC MACT). Also assisted cement plants in evaluating compliance strategies related to the Commercial and Industrial Solid Waste Incinerators (CISWI) Rule and understanding the Nonhazardous Secondary Materials (NHSM) Rule.

**Refinery Industry Experience.** Provided compliance support to East Coast refinery by monitoring the development of new federal, state and local regulations. Completed air permitting projects assessing NSR applicability and possible permitting paths. Managed projects to develop a comprehensive compliance plan for NSPS Ja and supported various aspects of Refinery Sector Rule implementation.

**MACT Standard Implementation.** Provided various trainings and developed requisite compliance plans and guidance documents including look up tables and/or applicability flow charts for the updates to the RICE MACT, Boiler MACT, Portland Cement MACT and Utility MACT standards. Managed project involving the detailed review of US EPA's Proposed Uniform Standards in 40 CFR Part 65, Subpart I (Storage Vessels and Transfer Operations), Subpart J (Equipment Leaks) and Subpart M (Control Devices). Project involved comparison of the proposed standards to existing language in existing MACT standards including HON, MON, Subpart SS, Subpart TT, Subpart UU and Subpart WW. Completed responses to Section 114 Boiler MACT survey from EPA.

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## **EXPERT WITNESS TESTIMONY**

In the Matter of Algonquin Gas Transmission, LLC, December 1-2, 2020, Docket Nos. 2019-008, 2019-009, 2019-010, 2019-011, 2019-2019-012, and 2019-013, Air Quality Plan Approval, Weymouth, MA.

## **EMPLOYMENT HISTORY**

2007 – Present	Trinity Consultants
2002 – 2007	Wyomissing School District, Wyomissing, PA
1997 – 2001	BRG Environmental, Frederick, MD
1996 – 1997	Spectrum Environmental Sciences, Frederick, MD
1993 – 1996	Pacific Environmental Services, Cincinnati, OH
1987 – 1989	Pennzoil Products Company, Reading, PA
1983 – 1987	Mobil Oil Corporation, Princeton, NJ