

EHS Support for the Liquefied Natural Gas (LNG) Industry



Trinity Consultants is a leading global environmental consulting firm that brings 50 years of experience providing services and solutions in the EHS Regulatory Compliance, Built Environment, Life Sciences, and Water & Ecology markets. Trinity has the technical expertise, industry depth, and specialized capabilities to help clients achieve their goals across the natural and built environments.

As a leader among EHS consulting firms, Trinity understands the intricacies of complex regulatory requirements and how they affect the LNG Industry. Over the past decade, Trinity Consultants has performed more than 800 environmental permitting and compliance projects for clients with terminal operations. Our industry experts have deep expertise in the environmental challenges facing these facilities and are able to provide cost-effective, timely solutions that enable them to enhance compliance and maintain operational flexibility.

Supporting LNG Terminals

Historically while the U.S. imported LNG from other countries, the development of innovative technologies and plentiful reserves has enabled the U.S. to become one of the world's leading natural gas producers and exporters. As a result, the number of license applications for LNG terminals has expanded significantly in the last decade.

The Federal Energy Regulatory Commission (FERC) is an independent agency that regulates the interstate transmission of electricity, natural gas, and oil. The FERC also reviews proposals to build LNG terminals and interstate natural gas pipelines including compressor stations. In addition to the FERC requirements for LNG terminals, interstate natural gas pipeline and compressor station operators must obtain approvals and permits from the state agencies in which they operate. For example, LNG terminals in Louisiana are required to obtain air permits from the Louisiana Department of Environmental Quality (LDEQ) in addition to the FERC approval. In Texas, typically both New Source Review (NSR) and Title V federal operating permits are required in addition to the FERC approval.

Trinity has extensive experience in assisting LNG terminals with preparation of air permit applications and critical portions of the National Environmental Protection Act (NEPA) Environmental Impact Statement (EIS). Specifically, Trinity has provided the following services to LNG terminals:

- LNG Deepwater Port (DWP) license application presentation
- Construction permit applications including Prevention of Significant Deterioration (PSD) and minor NSR



- Air quality dispersion modeling analyses
- Preparation of Resource Report 9 (RR9)
- Client advocacy-FERC and EPA
- State NSR regulatory analysis and permitting, including:
 - Permit modifications
 - Streamlined permits
 - Standard permits
 - Case-by-case permits, permit amendments, permit renewals
- Title V operating permits
- Ambient monitoring and Method 9 visual opacity observations
- Control technology determinations:
 - Best available control technology (BACT)
 - Reasonably available control technology (RACT)
 - Lowest achievable emission rate (LAER)
- NSPS and NESHAP performance and emission standards applicability analyses, and compliance plans
- Emissions inventories for:
 - Criteria pollutants
 - Greenhouse gases
 - National pollutant toxic release inventory (TRI)
- Indigenous tribal lands permitting
- Risk Management Plan development/renewal

Air Quality Permitting and Compliance

With a core focus on air quality services coupled with a strong, growing presence in the LNG industry, Trinity has substantial experience and a keen understanding of the regulatory requirements impacting LNG operations. Trinity has completed several projects for LNG industry clients including air permitting and environmental compliance projects for onshore terminals in various EPA regions.

Offshore permitting requirements differ significantly from onshore programs and include several additional jurisdictional requirements depending on project type which can include Bureau of Ocean Energy Management (BOEM), Maritime Administration (MARAD), and U.S. Coast Guard requirements. Trinity has deep experience with assistance to meet the requirements for these agencies. Trinity's excellent working relationships with these agencies has facilitated smooth communications between our clients and agencies, speedy issuance of permits, and more flexible permit conditions.

Air Dispersion Modeling

Trinity has performed multiple air dispersion modeling studies in support of state and federal air permit applications for LNG projects, NEPA analyses, FERC modeling requirements, and BOEM guidelines for modeling. We closely follow developments in EPA, FERC, Maritime Administration (MARAD), U.S. Coast Guard, and the Outer Continental Shelf (OCS) guidelines for import and export operations. Trinity utilizes a wide range of dispersion modeling software with varying applications depending on agency interaction and project location. Typical dispersion models utilized for these efforts include AERMOD/COARE, CALPUFF, and OCD programs.

Leak Detection Surveys

Since promulgation of GHG regulations, quantification of GHG emissions via fugitive components has become a topic of interest for many regulatory agencies. Trinity provides assistance with performing leak detection surveys at LNG terminals and platforms using a Forward-looking infrared (FLIR) camera.

Why Choose Trinity

Trinity has the experience and insights to provide intelligent solutions to environmental permitting and compliance requirements for the LNG sector. Our knowledge and expertise across a wide range of environmental topics make us an excellent partner for addressing these issues.

ISO 9001:2015 certified at our corporate office in Dallas, Texas

CONTACT OUR TEAM!

For more information about how we can help your organization, please contact us.

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