



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.

Trinity is recognized nationally for our skills in helping refining manufacturers achieve regulatory compliance with complex environmental regulatory requirements while producing the products needed in the marketplace.

Trinity has completed over 680 projects for refining clients in the last two years. Additionally, Trinity holds active memberships in associations like the American Fuel & Petrochemical Manufacturers (AFPM), which keeps us well versed in the environmental issues faced by the refining industry.

Innovative Compliance Solutions

Trinity provides a wide range of assistance to members of the refining industry including the following:

- Federal and state regulatory programs assistance
- Response to Section 114 requests/enforcement assistance
- Permitting support including:
 - Prevention of Significant Deterioration (PSD)
 - New Source Review (NSR) and minor NSR
 - Greenhouse Gas (GHG)
 - Title V permitting assistance
 - Air Dispersion Modeling
- Feasibility analyses for control options and pollution prevention assistance
- Alternative Monitoring Plan (AMP)
- Ambient Monitoring Networks
- Training on environmental, health, and safety (EHS) topics
- Compliance management tools and solutions
- Multimedia environmental auditing

Regulatory Program Assistance

Trinity Consultants works with the refining process industries to assess and implement practical solutions for managing environmental compliance. Trinity assists refining facilities with permitting, applicability, and compliance as related to multiple



regulatory programs. For example, we support facilities subject to:

- New Source Performance Standards (NSPS)
- Maximum Achievable Control Technology (MACT)
- Lowest Achievable Emission Rate (LAER)
- Best Available Control Technology (BACT)
- National Emission Standards for Hazardous Air Pollutants (NESHAP)
- Generally Available Control Technology (GACT)
- State specific requirements

Trinity also assists with applicability and compliance specified for refining sector clients including, but not limited to:

- NSPS regulations (e.g., K, Ka, Kb, J, Ja, NNN, RRR, GGG, GGGa, IIII)
- 40 CFR 61 (e.g., Y, BB, BWON/FF)
- 40 CFR 63 (e.g., HON, MACT CC, MACT WW, MACT UUU, MACT ZZZZ, and MACT LLLLL)

Projects include the development of Flare Management Plans (FMPs) and Continuous Parameter Monitoring System (CPMS) plans, preparing documents for required notifications and routine reports associated with the standards, and completing NSPS/MACT applicability determinations. Trinity also assists with day-to-day compliance activities by developing compliance tools that detail the elements required to demonstrate compliance with federal regulations as well as construction and Title V permits.

BWON Capabilities

Trinity has assisted numerous refineries in navigating the requirements of the Benzene Waste Operations NESHAP (BWON) program including consent decree compliance support, auditing, training, and consent decree terminations. Trinity also supports

refineries with routine compliance support under the BWON program including preparation and updates of annual Total Annual Benzene (TAB) reports and control equipment compliance reviews and design documentation.

LDAR Capabilities

Trinity has a reputation for excellence in providing a broad range of air quality and environmental management services including Leak Detection and Repair (LDAR) assistance. With each project, our goal is to exceed expectations so that our clients turn confidently to Trinity when faced with additional air quality challenges. Trinity has extensive LDAR knowledge and regulatory compliance expertise through direct experience at many facilities subject to the array of LDAR regulations including NSPS, MACT, NESHAP, and RCRA. In addition to regulatory knowledge, Trinity has certified FLIR GasFinder Thermographers, enabling us to assist with the identification of potential leaks as well as overall program management.

Environmental Compliance Training

Trinity offers national education courses focused on the needs of the refining industry several times annually as part of our extensive environmental training services. These courses include Clean Air Act Workshop for the Petroleum Refining Industry, Benzene Waste Operations NESHAP, NESHAP for Miscellaneous Organic Chemical Manufacturing (The MON), Clean Air Act Workshop for the Oil and Natural Gas Industry, Fundamentals of Tank Emission Calculations, Tank Emission Calculation Workshop with TankESP Software, and Tank Regulations Primer as well as custom courses and local seminars. Instructors are among our most senior technical staff whom also have exceptional teaching abilities.

Sustainability and Environmental Management

Trinity advises refining clients on managing carbon/energy risk to facilitate cost-effective business decisions and on proactively addressing stakeholder concerns regarding the EHS aspects of sustainability. They include:

- Carbon inventory, data management and verification
- Carbon mitigation analysis
- Business sustainability
- Life Cycle Analysis (LCA)

Audit Experience

Trinity is known for our skills in evaluating compliance with regulatory requirements and conformance with management system processes and practices. Using extensive permitting experience and in-depth knowledge of state and federal environmental regulations, Trinity is ideally suited to conduct effective compliance audits to ensure that all refining industry regulations have been properly addressed, determine compliance status, and suggest corrective action where needed. The result is a complete picture of all regulatory requirements to help you attain or maintain compliance.

Transportation Fuels Services

Trinity Consultants provides a wide range of services to refiners, importers, and commodities fuel traders related to state transportation fuel regulations. Our experienced staff assists clients with fuel certification, agency reporting, internal auditing, life-cycle analysis, project-level emissions assessment, fuel market analysis, verification and agency enforcement. We assist with the following:

- California Low Carbon Fuel Standard
- Oregon Clean Fuels Program
- California RFG and CARB Diesel Regulations
- California Cap-and-Trade and Mandatory Reporting Rule
- Terminal and Blending Requirements

Technology-Based Compliance Solutions

Trinity's Digital Solutions team has extensive experience assisting refining clients with technology based compliance solutions to help them operate efficiently and cost-effectively, while improving EHS performance. Technology solutions for the chemical sector, including:

- Third-party enterprise software for sharing information across organization departments
- Compliance solutions using Microsoft® SharePoint for streamlined documentation and reporting
- Mobile solutions for collecting and managing field EHS and maintenance data

Why Choose Trinity

Whatever your challenge, Trinity has the experience and insights to provide intelligent solutions to optimize air quality related environmental performance for the refining industry. Our knowledge and expertise across a wide range of environmental issues make us an excellent partner for addressing these issues.

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

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CONTACT OUR TEAM!

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

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