

 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.

### Technology Updates – Flares, HES, Reporting

Several MON updates were made to reflect current technologies, including new continuous monitoring and operational controls for flares, new sampling methods for heat exchange system, and electronic report submittals through CEDRI. Trinity's expertise with similar standards for refineries and other service sectors will help guide facilities through implementation of these new requirements.

### Control Ethylene Oxide, Even at Trace Levels

Under the new MON RTR standards, facilities are called to be ethylene oxide detectives, searching for any raw materials that may contain ethylene oxide and determining if controls are required for process vent, storage tank, and equipment leak emissions of ethylene oxide. In particular, any process vent that may contain ethylene oxide, at any concentration, even at trace levels, must be sampled to determine if controls are triggered. Whether tracking down trace compositions or establishing a process vent sampling program, Trinity can help sources ensure compliance with the new ethylene oxide standard.

### PRD Prohibitions, Monitoring and Work Practices

MON facilities are subject to requirements restricting releases to atmosphere from pressure relief devices (PRD), with compliance demonstrated by monitoring to identify and quantify relief events. Facilities must implement redundant control measures to prevent atmospheric release and, after release events occur, conduct root cause analyses and corrective actions. Trinity can also help facilities establish cost-effective PRD management programs, helping identify exemptions, leverage existing PSM plans and other site data to document redundant control measures, and establish PRD monitoring and release response plans.

### Replacing SSMP requirements

Under the MON RTR, the malfunction and startup, shutdown, malfunction plan (SSMP) provisions have been replaced with

the obligation to comply at all times and the addition of new maintenance venting and tank degassing work practice standards that must be met prior to the venting of equipment to atmosphere. Trinity is available to help environmental personnel identify and close gaps in existing equipment design, monitoring systems, operational and compliance procedures, and work practice standards that must be addressed to meet these revised MON requirements and to convert their existing SSMP program into an effective malfunction response program and work with site personnel to minimize or eliminate excess emissions events in the future.

Trinity brings additional value to MON RTR reviews through Trinity's Process Safety team. Working closely with Trinity's regulatory experts, Trinity's Process Safety team will help optimize your MON RTR compliance program through their extensive expertise in the following areas:

- PHA and risk assessments
- Flare and disposal system evaluations
- PRD systems engineering, design, and analysis
- Mechanical integrity services and validation

Leveraging its dedicated service groups focused on the Chemical Industry, Trinity is uniquely positioned to help fill the gaps for compliance under the MON RTR rule.

*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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