



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.

Regulatory developments surrounding Per- and Polyfluoroalkyl Substances (PFAS) are advancing nationally with respect to Toxic Release Inventory (TRI) reporting, Toxic Substances Control Act (TSCA) compliance, National Pollutant Discharge Elimination System (NPDES) stormwater/wastewater compliance, air quality permitting, waste management, environmental site investigations, state-agency instituted environmental penalties, and banning of PFAS usage. Many states are also enacting their own regulations aimed at PFAS management and investigating industrial sources of PFAS releases. Furthermore, PFAS regulations are expected to increase in the coming years and will affect many industries such as chemical manufacturing, bulk chemical/petroleum storage, semiconductors, pulp and paper, metal plating, automotive/aerospace, and metals mining.

What are PFAS?

Per- and Polyfluoroalkyl Substances (PFAS) are a family of thousands of chemicals that have been used in various industries for decades. The defining characteristic of a PFAS molecule are adjacent fluorinated carbons, such as shown in this example of Perfluorooctanoic Acid (PFOA).



A growing body of research suggests that there are health and environmental risks associated with exposure to these compounds, which has led to a flurry of new regulations in recent years.

Preparing for PFAS Regulations

Many facilities will benefit from evaluating the expected impact of new PFAS regulations; specifically, the identification of data gathering and/or procedural changes that may be needed, and whether any current site characteristics could introduce PFAS liabilities.



Organizations should investigate the presence of PFAS at their sites now to evaluate needed changes rather than waiting for rules to become enforceable. Early preparation for upcoming PFAS regulations requires an understanding of all parts of a facility, knowledge of where PFAS may be present, and analysis of potential contaminations and active waste streams. Each facility is different, requiring a site-by-site approach for PFAS investigation.

Proactively meeting EHS regulatory requirements can provide a springboard for companies to gain business benefits through a process focused on identifying potential improvements and methods of risk mitigation. Companies can avoid regulatory fines, negative publicity, increased costs (such as insurance and Worker's Compensation), and poor employee morale.

Expert PFAS Assistance

Trinity's EHS compliance auditors can leverage industry expertise; expert knowledge of Federal, State, and local regulations; and relationships with regulatory personnel to help you to understand and comply with relevant industry best practices and regulatory requirements. Trinity helps organizations evaluate their PFAS environmental compliance status to identify instances of potential regulatory non-compliance and opportunities for improvement. With our extensive auditing resources, skills, and experience, we will help you maintain and improve regulatory compliance, contributing to your company's economic, employee, and community success.

Many companies are currently operating with minimal EHS staff, making it challenging to manage increasing regulatory requirements for monitoring, recordkeeping, and reporting. In addition to consulting assignments, Trinity can supplement your EHS operations with short or long-term staff who have the regulatory knowledge to provide immediate assistance with dynamic PFAS regulatory challenges.

Our Approach

Trinity's large team of environmental consultants routinely assists clients in completing strategic analyses and assessments associated with facility expansions, compliance interpretations, and regulatory risk management. This customized content comes in various forms including memos outlining permitting impact options, regulatory white papers, business processes mapping, and site-specific monitoring plans. Trinity's internal Knowledge Management System, a state-of-the-art information technology platform, is an invaluable tool for executing strategic compliance projects. The system enables our consultants to access institutional knowledge through the real time exchange of information and thereby leverage the depth and breadth of our environmental expertise across hundreds of consultants to help our clients make sound business decisions.

PFAS Investigation Strategy

There are a multitude of PFAS regulations in development that will impact facilities in a wide variety of industries that currently use PFAS or have had historic usage. To prepare for the associated data gathering and PFAS management practices that will be required, we suggest these important steps be conducted as soon as possible to identify anticipated impacts.

- Examine current and historical facility processes with the needed detail to determine where PFAS may be or have been present
- Review Safety Data Sheets (SDS) and other formulation information of potential PFAS-containing materials to detail chemical identities and concentrations
- Evaluate potential manufacturing (including import), processing, otherwise use, onsite storage, waste streams (solid, liquid, air), and existing contamination from historic PFAS presence
- Compile recommendations for facility procedures or future investigations specific to individual regulations

Trinity is experienced and well suited to guide facilities through PFAS investigations on a detailed site-specific basis. Our industrial knowledge and PFAS expertise enable our teams to pinpoint exactly where to look for PFAS and then evaluate potential regulatory considerations. Typical recommendations for facilities involve reviewing new product formulations; examining and managing releases to air, water, and solid waste; and establishing data gathering procedures to track PFAS onsite.

PFAS Analytical Testing

PFAS quantitative characterization technology is rapidly evolving. The number of PFAS compounds that can be analyzed, types of testing media, and precision of results has advanced significantly in recent years and is expected to continue to develop. New PFAS regulations will depend on analytical testing methods to be able to enforce rules. The selection and execution of proper PFAS testing methods is essential to a successful PFAS management strategy. Trinity has

experience with PFAS quantitative characterization at the facility level and has relationships with analytical laboratories such that Trinity is well positioned to assist in PFAS testing for regulatory compliance.

Project Snapshot

Demystifying PFAS at a Building Fixtures Manufacturing Facility

Trinity was contracted by a client to review facility processes for PFAS presence including aluminum extrusion, anodizing, coating, and parts assembly. Trinity provided clarity not only by uncovering where PFAS were present at the facility, but also completing due diligence efforts to rule out PFAS presence in certain areas. Then, potential PFAS environmental release pathways were characterized and audited for liability in the context of current and potential future regulations. The client benefitted by having a clear picture of potential PFAS liabilities at their site and a recommended path forward to develop management strategies

Why Choose Trinity

For more than 50 years, Trinity has assisted facilities with environmental permitting and compliance. This domain expertise, combined with our knowledge of industry processes and our auditing experience provide a powerful resource for industrial companies. In short, there's no better choice for your environmental compliance management needs. Our experience is multi-faceted and extensive. Our strategies are innovative, time saving, and cost-effective. Our staff and tools are the best in the business.

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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