

# Trinity Supports EPA Compliance for Global Petcare Company



## CHALLENGE

Maintain accurate, compliant SPCC Plans amid complex, interpretive U.S. EPA regulations, across a nationwide portfolio of facilities.

## SOLUTION

Trinity develops and maintains site-specific SPCC Plans using a standardized, regulator-aligned approach that reflects facility operations and evolving federal and state requirements.

## RESULT

HSE personnel can focus on core health, safety, and operational priorities, confident that SPCC obligations are accurate, defensible, and sustainably managed.

## EHS PERFORMANCE AND RISK MANAGEMENT

Trinity Consultants has been providing environmental consulting services to a global petcare company, Incorporated since 2004. Headquartered in the U.S., the North American branch is a diverse and expanding enterprise representing confectionery, food, and pet care products and services worldwide. Over the years, Trinity has assisted in air permitting, wastewater, hazardous waste, industrial hygiene, and other environmental matters. This case study spotlights Spill Prevention, Control, and Countermeasure (SPCC) planning at nationwide facilities in accordance with U.S. EPA oil and petroleum regulations.

## CHALLENGE

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SPCC compliance is governed by detailed and interpretive EPA regulations that require specialized technical knowledge to apply correctly at the facility level. Determining applicability, classifying oil storage and equipment, evaluating containment measures, and addressing inspection and response requirements all demand a deep understanding of SPCC regulations and State nuances. Facility personnel are experts in their operations, and they also carry responsibility for core health, safety, and environmental functions, making it unrealistic for them to maintain the level of regulatory expertise required to develop and sustain compliant SPCC Plans. As a global petcare company with a variety of petfood products and industrial operations, accurately applying the SPCC regulations to each individual facility is a monumental task. Compounding this challenge, SPCC Plans are living documents that must evolve as facilities change. Equipment upgrades, oil inventory adjustments, and operational modifications often trigger the need for updated analyses, inventories, and site-specific drawings. The organization's health, safety, and environmental (HSE) leaders elected to outsource this task to Trinity, so that internal resources could remain focused on daily operating concerns.

## SOLUTION

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Trinity provides a standardized, site-specific SPCC program designed to deliver plans that are accurate, effective, and sustainable across the client's nationwide operations. To ensure accurate SPCC plans, Trinity confirms SPCC applicability and thresholds for each facility and develops a comprehensive oil inventory that reflects real-world operations. This process addresses nuanced regulatory interpretations, such as EPA's definition of "oil," classification of bulk storage containers, and distinctions between oil-filled operational and manufacturing equipment. Trinity's strategy to "follow the oil" for food ingredients such as soy lecithin, fish oil, and digest ensures that commonly overlooked equipment (e.g., day tanks, mixing vessels, etc.) are addressed in the SPCC Plans.

To create effective SPCC plans, Trinity designs documentation as a practical operational tool. Plans include clear inspection and integrity testing requirements aligned with applicable industry standards, evaluations of secondary containment measures, and simple spill response and reporting instructions. With petcare facilities located throughout the U.S., this particular company relies on Trinity's "local everywhere" philosophy. Trinity is able to leverage this local office expertise to combine State knowledge with SPCC subject matter experts. Trinity ensures sustainable SPCC plans by structuring them for long-term use and consistency across the organization's footprint. Standardized templates combined with facility-specific content streamline future updates, amendments, and five-year reviews. Language is carefully selected to meet EPA intent while preserving operational flexibility.

## RESULT

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Through Trinity's standardized, site-specific SPCC approach, this global petcare company maintains SPCC Plans that are accurate, compliant, and defensible across its nationwide operations. Plans are organized in a manner that supports efficient regulatory review, allowing inspectors and internal reviewers to quickly locate required information and confirm compliance with federal and state SPCC requirements.

Facility personnel benefit from clear, practical plans that reflect actual site conditions, including defined inspection responsibilities, containment practices, and spill response procedures. As a result, facilities are better prepared to prevent and respond to oil discharges, and personnel understand their roles without relying on deep regulatory interpretation. When changes occur, plans are structured to support efficient updates and amendments, reducing rework and minimizing disruption to daily operations.

At the corporate level, the organization achieves consistency and continuity across facilities, reducing variability and compliance risk while improving overall SPCC program reliability. HSE teams are relieved of the burden of maintaining specialized SPCC regulatory expertise, allowing them to focus on broader health, safety, and environmental priorities with confidence that SPCC obligations are being met and sustained over time.

### ABOUT TRINITY CONSULTANTS

Trinity Consultants, a leading global environmental consulting firm, provides services and solutions in the EHS Regulatory Compliance, Built Environment, Life Sciences, and Water & Ecology markets. Founded in 1974, Trinity has the technical expertise, industry depth, and capabilities to help clients achieve their goals across the natural and built environments.