

## TERMINAL OPERATIONS SERVICES

### > Environmental Support for the Terminals Industry

Trinity Consultants is well known for our commitment to air quality consulting and to providing accurate, timely, and professional service for our clients. Trinity has assisted clients with terminal operations with over 2,000 projects and is staffed and strategically located to support your critical environmental needs.

As we've grown, Trinity has expanded our breadth of environmental and related services to better serve our clients. Trinity provides terminal operators with a wide range of services to help ensure compliance with applicable environmental rules and regulations.

#### Permitting & Compliance Assistance

##### Air Permitting

Air is the most complex, burdensome, and rapidly changing environmental media, and typically the most critical in facility modification or new construction timelines. As the leading air quality consulting firm in the industry, Trinity is uniquely qualified to provide clients with critical permitting services including: PSD, nonattainment, and minor NSR construction permitting; Title V permit applications, revisions, and renewals; and air permitting evaluations, feasibility studies, and permitting strategy guidance. Permitting assistance for existing terminal operators includes: tank additions; product and operational flexibility (new materials / change of service; increased product vapor pressure, sulfur content, loading rates for tanks, truck, rail, and/or marine loading); and maintenance, startup, shutdown, and malfunction activities (pigging, tank cleaning, tank landing, equipment replacement, and repair).

##### Air Dispersion Modeling

Navigating the nuances of complex air dispersion modeling projects requires a unique set of skills. A pioneer in the development of the BREEZE suite of dispersion modeling software products since 1986, Trinity Consultants' success is reflected in our ability to optimize the results of your modeling runs, enabling maximum operational flexibility for your terminal. Services include predicting and comparing ground level criteria pollutant concentrations with NAAQS and state standards, comparing toxic compound impacts with health effect screening levels, and assessing the effects of accidental release scenarios.



##### Compliance Assistance

Once permits are issued, analyzing the requirements and developing the systems, tools, and strategies to assure compliance is critical. Trinity works extensively with facilities to streamline the associated processes.

- > **NSR and Title V permit deconstruction** - We can assist in deconstructing NSR (PSD, nonattainment, minor source) and Title V permit special conditions and related environmental requirements, summarizing compliance tasks, identifying operations and environmental responsibilities to achieve compliance, analyzing compliance gap risks, and implementing the requirements into compliance management systems. We also routinely assist in compiling Title V semi-annual compliance reports, deviation assessments, and related reporting.

Trinity can provide monthly calculation of rolling 12-month emissions for permit compliance for storage tanks, material loading, combustion sources, VRUs, enclosed flares, fugitives, and SSM activities (pigging, tank roof landing, vacuum truck, frac tank, vessel degassing, sandblasting, painting, etc.).

➤ **Development of user-friendly tools** - We can help streamline the documentation process for permit compliance by providing tools to improve efficiency including forms/instructions/checklists, standard operating procedures, compliance calendars, and emissions calculation templates. These resources can expedite compliance tasks such as the following:

- Emissions inventory quantification and reporting
- Annual emission inventory development
- Greenhouse gas mandatory reporting
- Toxic Release Inventory (TRI) and Pollution Prevention Plans
- EPCRA Tier II reports

## NSPS and NESHAP/MACT support

Trinity assists with determining NSPS and NESHAP/MACT applicability for any proposed equipment or process change including the preparation of rule applicability summaries. With respect to compliance demonstration, Trinity routinely prepares compliance calendars and documentation checklists for subparts such as NSPS Dc, Kb, IIII, JJJJ, and MACT R, Y, EEEE, ZZZZ, DDDDD, and GGGGG. Additional support includes: conducting engineering calculations to demonstrate compliance with various NSPS and NESHAP/MACT standards; preparing NSPS and NESHAP/MACT notifications; preparing periodic compliance and excess emissions reports; developing/auditing Operation and Maintenance (O&M) Plans required by MACT Y; and developing/auditing startup, shutdown, and malfunction (SSM) plans required by MACT EEEE.

## Transportation Fuel Compliance

### Fuel Records and Procedural Audits

Trinity can conduct terminal record and facility audits to ensure appropriate fuel handling, recordkeeping, and reporting procedures are being followed by terminal staff. Implementation of appropriate standard operating procedures and quality assurance techniques for handling transportation fuels is key to maintaining fuel integrity and meeting certain specification limits, such as those that apply to distillation properties, sulfur, and benzene. Examples include proper pipeline and manifold flushing, tank cleaning, and handling of transmix.

### Support for Fuel Blending Requirements

Trinity assists terminal operators in complying with requirements related to transportation fuel handling, blending, and distribution. This includes registration as a transportation fuel blender and/or distributor as required by federal and/or state agencies. In addition, Trinity can provide support with fuel and fuel additive registration, as well as volumetric additive report (VAR) preparation and submission.

## Additional Support Services

In addition to air permitting and fuels compliance support, Trinity assists terminal operators with a wide array of other environmental requirements.

- **LDAR Compliance Audits** – Trinity's highly credentialed auditing staff perform LDAR audits and provide recommendations regarding findings for timely resolution
- **Emission Events (e.g., flaring, spill/release, unit trip)** – We assist with emissions calculation and reporting to minimize negative implications
- **PSM/RMP** – We develop and audit site Process Safety Management (PSM) and Risk Management Planning (RMP) programs
- **Complex Jurisdictional Determinations** – Trinity assists in determining regulatory jurisdiction points for PHMSA/DOT/RRC, EPA, and US Coast Guard regulatory applicability, for the purpose of defining and fulfilling applicable planning, inspection, and testing requirements under each set of regulations
- **Water/Waste Permit & Compliance** – We prepare MSGP Stormwater Permits and SWPPPs, NPDES Stormwater Discharge Permits, hydrostatic test water discharge permits, waste generator notifications and reporting, waste contingency plans, and SPCC/Facility Response Plans (FRP)
- **Stack Testing Oversight** – We are able to oversee stack testing efforts to ensure compliance and minimize wasted effort

## Trinity Can Help

Whatever your air quality or broader environmental challenges, Trinity has the deep experience and commitment to client service to meet your needs. For assistance, contact your local Trinity office at (800) 229-6655.

