

# REGULATORY ASSISTANCE

## > Environmental, Health and Safety Compliance Audits

Companies worldwide are focused on maintaining or exceeding compliance with environmental, health and safety (EHS) regulatory requirements. Meeting EHS regulatory requirements can also 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. Trinity's EHS compliance auditors are able to leverage industry expertise with knowledge of Federal, State, and local regulations and relationships with regulatory personnel, thereby helping you to understand and comply with relevant industry best practices and regulatory requirements.

### Prevention

Trinity can help evaluate your EHS compliance status to identify instances of regulatory non-compliance and opportunities for improvement. With our extensive auditing resources, skills, and experience, we will help you maintain and improve your regulatory compliance, contributing to your company's economic, employee, and community success.

### Staffing

Increased regulations for monitoring, recordkeeping, and reporting make it difficult to ensure proper oversight of operations, especially if an EHS department is operating with minimal staff. Trinity provides the additional resources needed to perform comprehensive and effective EHS audits. We provide objective assessments of your compliance status, recommend changes to correct problems, and provide guidance to ensure improved performance in the future.

### Our Approach

Trinity can conduct independent third-party EHS compliance audits or participate on your company's internal audit team. As a third-party auditor, Trinity's audit process is as follows:

#### Develop Audit Plan

Trinity works with you to determine the scope of the audit and develop an audit plan based on scope and staff availability. This ensures that the audit will run smoothly during the on-site portion.

#### Review Documentation

Trinity will review applicable regulatory documentation in advance of the audit to ensure efficient use of time on-site.

#### Conduct Onsite Audit

Trinity's lead auditor conducts an opening meeting with pertinent personnel to commence the audit. While onsite, Trinity interviews staff and performs visual observations of activities and operations at the audited location. Documents and records are reviewed to ensure all reporting and data gathering is complete. Daily debrief are held to disclose findings and a final closing meeting at the end of the audit is used to review and summarize findings.



#### Audit Report

Trinity develops an audit report based on your stated needs. Audit reports generally include a summary and a findings table of instances of non-compliances and opportunities for improvement identified during the audit.

Trinity offers the following EHS Auditing Services:

- > **Regulatory Compliance Auditing** — Auditing facility operations to evaluate compliance with EHS regulations is especially important because it helps companies identify potential areas of risk for their facilities. Trinity conducts EHS compliance audits

for a variety of industries against applicable EPA, OSHA, and state and local regulatory requirements. Trinity's certified professional EHS auditors have conducted hundreds of compliance audits and serve in leadership roles in national auditing organizations.

- **Corporate EHS Audits** — Audits are structured to assess a company's performance against EHS regulatory requirements and a company's own internal standards, policies, and procedures. These audits often exceed regulatory requirements and encompass industry best practices. Trinity can conduct the audits independently or participate on your audit team for a single site or numerous sites. As a result, Trinity help assess associated risk to the company.

## Examples of Our Work

- Trinity is part of an audit team that conducts annual environmental, process safety management (PSM) and health and safety audits for a North American chemical company. For each of the seven plants audited annually, a three-year rotation on audit topic occurs. The audit team includes Trinity auditors, as well as 2nd party auditors from the client (an EHS manager from another plant location, for example). As part of these audits, Trinity identifies non-compliances and opportunities for improvement for each facility. Involving Trinity on each audit for each chemical plant has benefited the client with respect to consistency and quality, and facilitates sharing of best practices among plant locations.
- Trinity conducted on-site multi-media environmental compliance audits at 19 petroleum and bulk terminal facilities in California. The audits included a review of environmental programs at fuel dispensing terminals and maintenance shops that supported the company's fleet of bulk delivery vehicles. The project scope included an evaluation of Federal, State, and local air, water, hazardous waste, and DOT requirements. Trinity identified non-compliances, best practices, and recommended corrective actions to bring the site into compliance with regulatory requirements.
- A client company requested Trinity's support regarding its potential acquisition of assets used to generate electricity and transport and store

fuel. Because several of the assets were located in environmentally restrictive locations, the client needed a quantitative valuation of existing and future environmental obligations. Trinity used a rapid due diligence deployment of resources and played a vital role in the client's overall bid package. To meet the tight timeframe, Trinity mobilized multiple teams to perform research, conduct site visits, and assess environmental obligations.

- As part of an environmental auditing program, Trinity conducted audits for more than 20 facilities for a truck leasing company throughout North America. The deliverable from each site was a concise conformance audit report including findings, opportunities for improvement, recommended corrective actions, and best management practices. Trinity also compared gaps from all sites and prepared a summary that identified common versus site-specific findings. Additionally, Trinity included an overview of compliance risk based on the audit results and ranked the potential significance of compliance/risk areas on a risk heat map.

## Why Choose Trinity

For more than 40 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 auditing resource for industrial companies. Trinity's staff includes Certified Professional Environmental Auditors (CPEAs), certified ISO 14001 auditors, American Chemistry Council Responsible Care® trained auditors, Certified Practitioners for Energy Management Systems – Industrial Sector (CP EnMS) ISO 50001 and Superior Energy Performance, ISO 9001 and OHSAS 18001 trained auditors. For more information about how Trinity can help you with EHS audits, contact your local Trinity office at (800) 229-6655.

*ISO 9001:2008 certified at our corporate office in Dallas, Texas*

