

CHEMICAL SECTOR SERVICES

> Environmental Support for the Chemical & Pharmaceutical Industries

Founded in 1974 in Dallas, Texas, Trinity Consultants is recognized nationally for our skills in helping chemical and pharmaceutical manufacturers achieve regulatory compliance with complex environmental regulatory requirements while producing the products needed in the marketplace. Trinity has completed nearly 400 projects for chemical and pharmaceutical clients in the last two years.

Innovative Compliance Solutions

Trinity provides a wide range of assistance to members of the chemical and refining industries including the following:

- > Federal and state regulatory programs assistance
- > Response to Section 114 requests / enforcement assistance
- > Emission calculations including batch process calculations
- > Permitting support including:
 - Prevention of Significant Deterioration (PSD)
 - New Source Review (NSR) and minor NSR
 - Greenhouse Gas (GHG)
 - Title V permitting assistance
- > Feasibility analyses for control options and pollution prevention assistance
- > Alternative Monitoring Plan (AMP) / AMOC
- > Ambient Monitoring networks
- > Training on EH&S topics
- > Compliance management tools and solutions
- > Multimedia environmental auditing



Regulatory Program Assistance

Trinity Consultants works with the chemical process industries to assess and implement practical solutions for managing environmental compliance. Trinity assists chemical and pharmaceutical facilities with permitting, applicability, and compliance as related to multiple regulatory programs. For example, we support facilities subject to:

- > New Source Performance Standards (NSPS)
- > Maximum Achievable Control Technology (MACT)
- > National Emission Standards for Hazardous Air Pollutants (NESHAP)
- > Generally Available Control Technology (GACT)
- > State specific requirements

Trinity also assists with applicability and compliance specified for chemical sector clients including, but not limited to:

- > NSPS SO2 regulations (e.g., NSPS III, NSPS NNN, NSPS RRR, NSPS VV, NSPS VVa)
- > 40 CFR 61 (e.g., BWON)
- > 40 CFR 63 (e.g., HON, MON, Pharma MACT, CMAS Rule, HCl MACT, PAI, MACT YY)

Projects include the development of Startup, Shutdown, and Malfunction (SSM) plans, preparing documents for required notifications and routine reports associated with the standards, and completing MACT applicability determinations. Trinity also assists with day-to-day compliance activities by developing compliance tools that detail the elements required to demonstrate compliance with federal regulations as well as construction and Title V permits.

LDAR Capabilities

Trinity has a reputation for excellence in providing a broad range of air quality and environmental management services including Leak Detection and Repair (LDAR) assistance. With each project, our goal is to exceed expectations so that our clients turn confidently

to Trinity when faced with additional air quality challenges. Trinity has extensive LDAR knowledge and regulatory compliance expertise through direct experience at many facilities subject to the array of LDAR regulations including NSPS, MACT, NESHAP, and RCRA. In addition to regulatory knowledge, Trinity has certified FLIR GasFinder Thermographers, enabling us to assist with the identification of potential leaks as well as overall program management.

Environmental Compliance Training

Trinity offers national education courses focused on the needs of the chemical industry several times annually as part of our extensive environmental training services. These courses include *MACT Compliance for the Refining Industry*, *MACT Compliance for the Pharmaceutical Industry*, *NESHAP for Miscellaneous Organic Chemical Manufacturing (The MON)*, *Clean Air Act Workshop for Synthetic Organic Chemical Manufacturing Industry (SOCMI)*, as well as custom courses and local seminars. Instructors are among our most senior technical staff whom also have exceptional teaching abilities.

Sustainability & Environmental Management

Trinity advises chemical clients on managing carbon/energy risk to facilitate cost-effective business decisions and on proactively addressing stakeholder concerns regarding the EH&S aspects of sustainability. They include:

- Carbon inventory, data management & verification
- Carbon mitigation analysis
- Business sustainability
- Life cycle analysis (LCA)

Trinity Audit Experience

Trinity is known for our skills in evaluating compliance with regulatory requirements and conformance with management system processes and practices. Using extensive permitting experience and in-depth knowledge of state and federal environmental regulations, Trinity is ideally suited to conduct effective compliance audits to ensure that all chemical sector regulations have been properly addressed, determine compliance status, and



suggest corrective action where needed. The result is a complete picture of all regulatory requirements to help you attain or maintain compliance.

Technology Based Compliance Solutions

T3, a division of Trinity Consultants, has extensive experience assisting chemical clients with technology based compliance solutions to help them operate efficiently and cost-effectively, while improving environmental, health, and safety (EH&S) performance. Technology solutions for the chemical sector, including:

- Third-party enterprise software for sharing information across organization departments
- Compliance solutions using Microsoft SharePoint for streamlined documentation and reporting
- Mobile solutions for collecting and managing field EH&S and maintenance data

How Trinity Can Help

Whatever your challenge, Trinity has the experience and insights to provide intelligent solutions to optimize air quality related environmental performance for the chemical and refining industries. Our knowledge and expertise across a wide range of environmental issues make us an excellent partner for addressing these issues.

For assistance, contact your local office at (800) 229-6655 or Inaas Darrat, PE, Director of Chemical Sector Services at (713) 552-1370 or idarrat@trinityconsultants.com.

