

REGULATORY ASSISTANCE

EHS Consulting for Oklahoma Industry

Founded in 1974, Trinity Consultants helps organizations overcome complex, mission-critical challenges in EHS, engineering, and science through expertise in consulting, technology, training, and staffing. We support clients in geographies worldwide and across a broad range of sectors including industrial, energy, manufacturing, mining, life sciences, and commercial/institutional.

Trinity opened its first office in Oklahoma in 2000 in Oklahoma City to provide local presence and state-specific expertise. In 2012, Trinity opened a second office in Tulsa.

While we started in Oklahoma as air quality experts, our depth of services has expanded over the years to include stormwater, wastewater, Spill Prevention Control and Countermeasure (SPCC), Resource Conservation and Recovery Act (RCRA), Risk Management Planning (RMP)/Process Safety Management (PSM), Emergency Planning and Community Right-to-Know Act (EPCRA) Tier II/TRI, Optical Gas Imaging (OGI), Leak Detection and Repair (LDAR), Environmental Site Assessments, and comprehensive EHS construction management.

Our Oklahoma-based staff members have diverse, multi-disciplined backgrounds, including chemical, environmental, and mechanical engineering, and mathematics. Many staff members have worked in industry prior to joining Trinity. This diversity allows Trinity to deliver the highest quality solutions efficiently and cost-effectively.



Our track-record includes high-profile compliance projects for a wide range of industries including:

- ▶ Agriculture and Food Processing
- ▶ Building Products
- ▶ Cement, Lime and Aggregates
- ▶ Crude Oil Pipelines and Storage
- ▶ Electrical Power Generation
- ▶ Fertilizer
- ▶ Petroleum Refining and Refined Products Terminals
- ▶ Pulp and Paper
- ▶ Upstream and Midstream Oil and Gas
- ▶ Various Manufacturing

Air Quality Permitting

Effective air permitting requires extensive experience in all aspects of air quality analysis and regulation. Trinity has completed thousands of projects in Oklahoma involving criteria and hazardous air pollutants, greenhouse gases, and other regulated emissions. Trinity leverages this experience to provide the following comprehensive air quality permitting services:

- ▶ State Construction Permits (individual and general permits, permit by rule, modifications and amendments, and applicability determinations)
- ▶ Prevention of Significant Deterioration (PSD) Construction Permits
 - Air Quality Analyses (e.g., modeling)
 - Control Technology Analyses
- ▶ State and Federal Operating Permits
- ▶ Litigation support in all the above areas

In support of permitting and other projects, Trinity's Oklahoma team has developed expertise in several emission models including ProMax, TankESP, ToxChem, Water9, and others, and has developed several custom tools, e.g., for flare design and tanks calculations.

Trinity's extensive air permitting experience provides practical expertise that is critical when negotiating with the ODEQ. We have working relationships with nearly every ODEQ engineer and ODEQ permitting personnel to keep track of our clients' permit application progress and quickly respond to questions.

Air Dispersion Modeling

Trinity is recognized internationally and locally for our skills in conducting air dispersion modeling studies to support permit applications, state regulatory planning, regional haze, emergency response planning, litigation support, and engineering/feasibility assessments. Trinity has completed hundreds of air dispersion

modeling analyses in support of air quality projects throughout Oklahoma. Our Oklahoma staff has experience using most air quality models sanctioned by the EPA and other regulatory authorities, including:

- ▶ AERMOD and AERSCREEN (including PVMRM and OLM)
- ▶ HYSPLIT
- ▶ CALPUFF
- ▶ CAMx/CMAQ
- ▶ DEGADIS and Other Dense Gas Models
- ▶ Various Accidental Release/Hazard Assessment Models

Professional Training

Trinity provides professional training courses, taught by senior-level consultants who are experts in their field. We also develop customized training material and teach custom courses and webinars designed to meet the needs of individual organizations.

Stormwater and Wastewater Services

Trinity has years of experience in providing the following comprehensive water quality permitting services:

- ▶ Federal and State Stormwater and Wastewater Permitting
- ▶ Facility-specific Stormwater Pollution Prevention Plan (SWPPP) Development

Periodic compliance auditing is available to determine compliance status, revise permits and/or plans as needed, and ensure that all applicable regulations are being properly addressed.

SPCC Services

Trinity has extensive experience in using objective, defensible tools to assess the applicability of the SPCC program. And when an SPCC plan is needed, Trinity's team has completed hundreds of plans for a wide range of industries, including oil & gas, pharmaceuticals, chemicals, food processing, forest products, and other manufacturing.

Compliance Auditing

Using our permitting experience and in-depth knowledge of state and federal environmental regulations, Trinity is ideally suited to conduct thorough compliance audits to ensure that all regulations have been properly addressed, determine compliance status, and suggest corrective action where needed. Trinity's multimedia compliance auditing expertise in Oklahoma spans virtually all programs under CAA, CWA, OPA, EPCRA, ODS, RCRA, and OSHA.

Environmental Data Management

Trinity and its EHS Digital Solutions team specialize in assisting clients evaluate their needs for and then implement both custom and third-party environmental data management systems to increase the effectiveness of tracking environmental information.

Environmental Compliance Reporting

Trinity's Oklahoma team members have completed thousands of environmental compliance reports, including but not limited to:

- ▶ Annual Air Emissions Inventories
- ▶ TRI Reports (Form R)
- ▶ GHG Mandatory Reporting Rule Reports
- ▶ Tier II Chemical Inventory Reports
- ▶ Discharge Monitoring Reports
- ▶ Comprehensive Site Compliance Eval. Reports
- ▶ Title V Annual Compliance Certifications
- ▶ Title V, NSPS, and NESHAP Reports
- ▶ Annual/Biennial Hazardous Waste Reports

Property Acquisition Risk Assessment Services

Trinity has extensive experience developing Property Acquisition Risk Assessments involving not only the Phase I Environmental Site Assessment (ASTM E1527-13) standard but also an accompanying environmental compliance screening that highlights current regulatory compliance status and hindrances to process diversification or expansion.

NEPA Compliance and Support

Trinity has assisted clients in determining if their projects are excluded from NEPA review (Categorical Exclusions) as well as assisted in the development of their required environmental assessments (Environmental Assessments and Environmental Impact Statements). Trinity's multidisciplinary approach allows for management of all aspects of Environmental Assessments and Environmental Impact Statements, leading to increased efficiency and reduced project timelines. Our NEPA experience spans multiple states, industries, lead agencies and project types.

ESG and Sustainability Support

Trinity provides climate change and sustainability program support to companies across many industries. We help our clients build their climate change programs in tandem with their compliance programs, which increases the efficiency for data gathering and reporting activities. Trinity's decades of environmental expertise means we are qualified to support clients at any point in their climate change initiative process – strategy development, baseline quantification, program implementation, and regular reporting on a number of disclosure frameworks.

Trinity Can Help

Whatever your challenge, Trinity has the insight to provide intelligent solutions to optimize environmental performance for Oklahoma industry. Our knowledge and experience in all aspects of environmental quality make us an excellent partner for addressing these issues. For more information about how Trinity can help your organization, please contact us at 918.622.7111

ISO 9001:2015 certified at our corporate office in Dallas, Texas