

Benzene Waste Operations NESHAP Support (BWON)

Trinity Consultants is a leading global environmental consulting firm that brings 50 years of experience providing services and solutions in the EHS Regulatory Compliance, Built Environment, Life Sciences, and Water & Ecology markets. Trinity has the technical expertise, industry depth, and specialized capabilities to help clients achieve their goals across the natural and built environments.

Trinity excels in a broad range of air quality and environmental services for companies across the nation and internationally, including Benzene Waste Operations NESHAP (BWON) assistance for chemical manufacturing plants, coke by-product recovery plants, and petroleum refineries. 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 thoroughly understands the BWON citations—their requirements, origin, and implementation.

Trinity also offers professional BWON training courses, covering introductory material for people new to the regulation and in-depth exploration of confusing issues and rationale for cost-effective decision making.

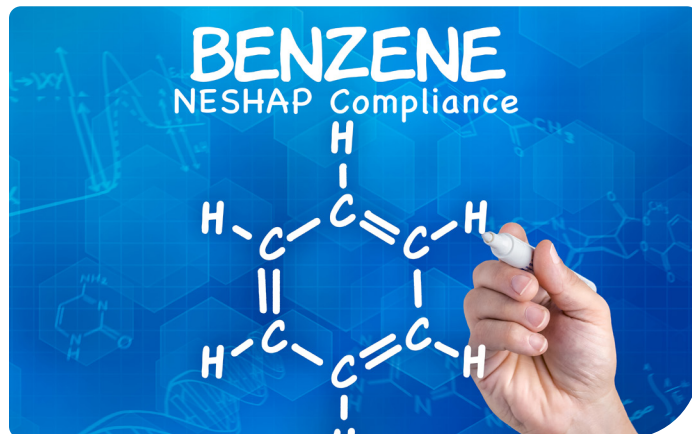
Regulatory Compliance

Trinity's BWON experience includes applicability and compliance support for facilities subject to 40 CFR Part 61, Subpart FF at all types of regulated facilities. We are able to efficiently determine your applicability and assist with a compliance strategy that helps your facility meet regulatory requirements.

Third-Party BWON Audits

Trinity offers a range of auditing services, from overall BWON program review to detailed reassessment of each waste, characterization, and control. We have performed more than many review and verification audits in response to client's Consent Decrees.

As part of the standard procedure for most Consent Decree third party audits, Trinity's auditors perform a thorough review of recordkeeping, inspections, documentation and field verification of all controls along with TAB review and verification for selected process units, P&ID review, and operator interviews. We also review the MOC process with respect to the BWON program.



Related Services

Trinity provides a wide range of assistance related to BWON, including the following:

- Total Annual Benzene (TAB) and uncontrolled benzene quantification
- Compliance program reviews, audits, and verifications
- EPA compliance/enforcement negotiations
- Wastewater, oil, and vapor management and treatment/control
- Wastewater sampling
- Regulatory interpretation and training

BWON Training Courses

Benzene Waste Operations NESHAP for Chemicals: Webinar Series

This 3-part webinar series is specifically for the chemical industry-environmental staff and management who need a better understanding of BWON. The series covers essential topics such as rule applicability, point of generation (POG) determination, total annual benzene (TAB) calculations, 2 Mg and 6 Mg compliance options, and control requirements under the rule. Register for one or all three of the following chapters:

- Chapter 1: Are You Subject to BWON (1.5 Hours)
 - Applicability
 - Continuous Applicability/Overlap Provisions
- Chapter 2: Annual TAB Reporting (2.5 Hours)
- Chapter 3: Controls and Program Implementation (2.5 Hours)

Benzene Waste Operations NESHAP

Have you recently been assigned responsibility for your facility's BWON compliance program? Would you like to know the underlying regulatory rationale for the procedures you just inherited? This 1-day course will clarify the complicated BWON regulation, so you can understand your facility's existing compliance program. Not only will you understand your BWON program's history, you will be able to identify opportunities for improvement and recognize circumstances that warrant program revision. Our course is taught by experts in the BWON regulation who have developed compliance programs from scratch, audited and upgraded existing programs, and who routinely interact with regulators regarding areas of enforcement priority.

Benzene Waste Operations NESHAP Roundtable

Environmental professionals who develop and implement BWON compliance programs understand that the BWON is a complicated regulation. Despite knowing the citations well, we routinely encounter issues where no clear compliance approach is established. At this training event, Trinity moderates a round-table forum to discuss these unclear issues and debate rationale for addressing them. Because of regulatory overlap, the roundtable is ready to consider issues related to Subpart QQQ, HON, MON, EACT, and Subpart CC. Trinity initiates a list of selected topics for discussion, and we welcome the input of all attendees.

For a schedule of upcoming training events, visit trinityconsultants.com/training.

Why Choose Trinity

In short, there's no better choice for your dispersion modeling needs. Our experience is multi-faceted and extensive. Our strategies are innovative, time saving, and cost-effective. Our staff and tools are the best in the business.

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

CONTACT OUR TEAM!

For more information about how we can help your organization, please contact us.

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