

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 deeply understands the BWON requirements, origin, implementation – including the ongoing U.S. EPA enforcement initiative.

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.

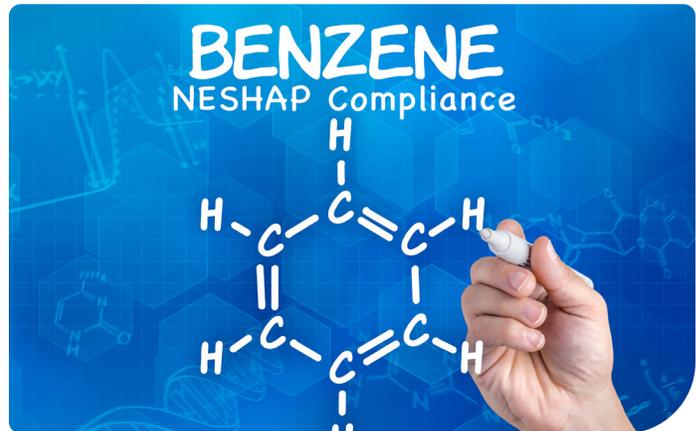
Regulatory Compliance

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. For refining clients, Trinity can also help your facility understand overlap between BWON regulations, the wastewater provisions of New Source Performance Standards (NSPS) Subpart QQQ (40 CFR 60, Subpart QQQ), Maximum Achievable Control Technology (MACT CC) (40 CFR 63, Subpart CC), and state specific regulations.

Third-Party BWON Audits

Trinity provides auditing services ranging from full BWON program evaluations to detailed reassessments of each waste stream, its characterization, and applicable controls. We have completed numerous review and verification audits in support of clients operating under Consent Decrees, as well as for clients seeking to proactively prepare for potential U.S. EPA inspections.

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 Total Annual Benzene (TAB) review and



verification for selected process units, Point of Generation (POG) review, End of Line (EOL) sampling review, P&ID review, Management of Change (MOC) process, and operator interviews. Trinity's experience across numerous sites allows us to review a facility's waste characterization and calculations and readily identify streams requiring additional focus.

For clients seeking proactive audits, Trinity attempts to mimic the type of inspection that would be conducted by U.S. EPA including No Detectable Emissions (NDE) monitoring via Method 21 monitoring, optical gas imagery (OGI) inspections, and visual inspections to identify common compliance issues (cracked concrete, low/dry water seals, loose caps/covers, atmospheric vent pipes, gasket/sealant issues, etc.).

Consent Decree Support

Trinity can assist facilities with ongoing BWON negotiations and provide litigation support as needed. Negotiation assistance may include review and support of proposed consent decree terms and preparation for agency meetings. Trinity can also assist clients with successful implementation for cost effectively and timely compliance with consent decree requirements.

Other BWON Services

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

- Total Annual Benzene (TAB) and uncontrolled benzene quantification (BQ)
 - Annual TAB preparation and revalidation
 - Implementation of best practices and QA/QC tips and tricks
 - Waste characterization and technical calculation support



BWON Webinars and Courses

Trinity also offers complimentary periodic BWON webinars, on-demand webinars, and full-length courses. For access to the complementary webinars and a schedule of upcoming BWON training events and webinars, visit trinityconsultants.com/training.

Why Choose Trinity

Trinity built its reputation for excellence on air quality expertise. Our staff of EHS experts is one of the largest in the country and knowledgeable regarding BWON regulatory requirements. We have provided compliance and field support at facilities nationwide.

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

- Review and analysis of potential 2 Mg and 6 Mg compliance option threshold updates and gap assessments
- Implementation of self-audit programs to catch issues before EPA inspections (e.g., best practices for visual inspections, FLIR screening, Method 21, records reviews)
- Development of BWON compliant and best practice sampling program
- EOL sampling plan development and support
- Treatment and control device support
- Container inspection and monitoring guidance
- NSPS QQQ compliance support for Refineries
- Tank compliance support including regulatory overlap between BWON, NSPS, MACT, and state specific regulations. Preparing responses to agency inspections and notices of violation.

BWON Training

Custom Training

Trinity has prepared and instructed a number of custom BWON courses tailored to facilities needs. These courses can cover essential topics such as rule applicability, POG determination, TAB calculations, 2 Mg and 6 Mg compliance options, and control requirements under the rule. Courses may also cover facility-specific compliance hurdles and case-by-case applicability determinations, as well as best practices for an effective and compliant BWON program.

Benzene Waste Operations NESHAP – Full Day Course

Trinity offers a one-day BWON course each year. The course is designed to clarify the complex BWON regulation and help you better understand your facility's current compliance program. In addition to learning the history and key requirements of BWON, you will be able to identify opportunities for improvement and recognize situations that may warrant program updates. The course is taught by BWON experts who have developed compliance programs from the ground up, audited and upgraded existing programs, and routinely interact with regulators on enforcement priorities. The course also includes an overview of the latest U.S. EPA BWON enforcement initiatives.

CONTACT OUR TEAM!

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

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