

Overlapping Wastewater Air Regulations

BWON, MON, & HON

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Why Comply?

- We care about each other, families, and the environment.
- We care about compliance.
- Compliance is important for the future.
- We each have the responsibility to minimize negative impacts by ensuring compliance with regulations.





Air Regulations

Ever think they are confusing or overwhelming?

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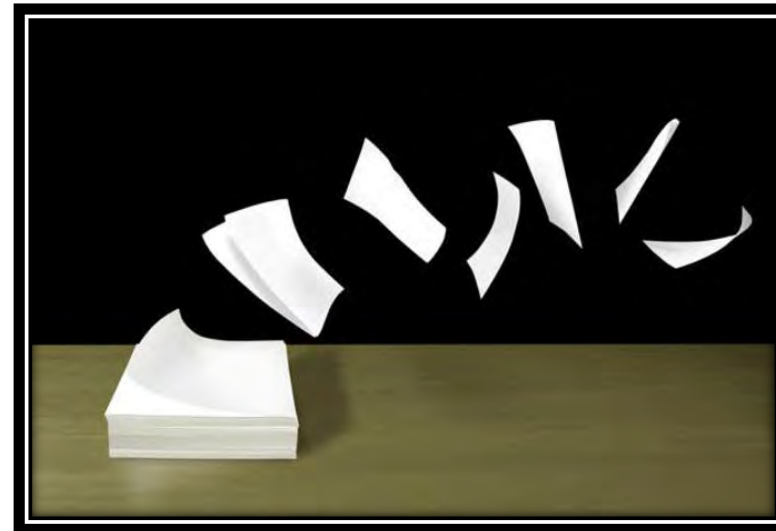
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Overlapping Air Regulations

- Benzene Waste Operations NESHAP (BWON)
- Hazardous Organic NESHAP (HON)
- Miscellaneous Organic NESHAP (MON)
- Louisiana Administrative Code (LAC 33:III.2153)



Hazardous Organic NESHAP (HON)

- Part 63, Subpart F, G, H, and I- National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (SOCMI)
- HON regulates emissions of HAP's from SOCMI.
- Applicable if
 - 10 TPY of any HAP or 25 TPY of any combination of HAPs.
 - Chemical Manufacturing Process Unit (CMPU) must be a SOCMI listed in Table 1 of Subpart F.
 - CMPU must use or manufacture a chemical listed in Table 2 of Subpart F.
 - Area of the facility must be a major HAP source.
- Subpart G contains the requirements on wastewater streams



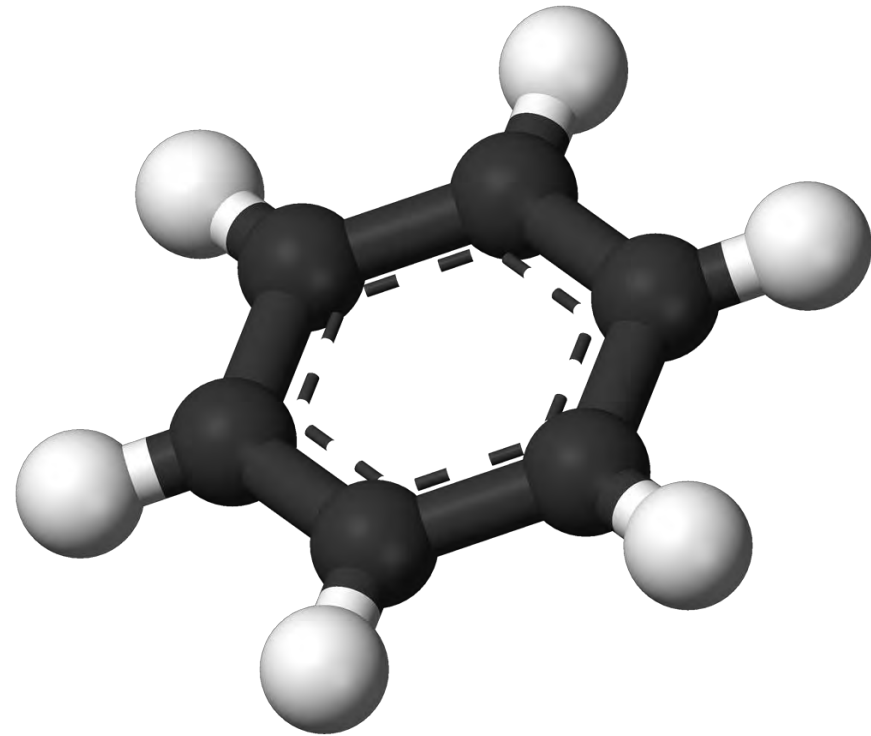
Miscellaneous Organic NESHAP (MON)



- Part 63, Subpart FFFF - National Emission Standards for Hazardous Air Pollutants from Miscellaneous Organic Chemical Manufacturing
- Applicable if:
 - 10 TPY of any HAP or 25 TPY of any combination of HAPs.
 - The facility manufacture chemicals classified by NAICS codes 325131, 325181, 325188, 325314, or 325992.
 - The facility has a MON process constructed or reconstructed after April 4, 2002.
- Typically regulates emission sources in chemical manufacturing that is not regulated under a different MACT rule.

Benzene Waste Operations NESHAP (BWON)

- 40 CRR Part 61, Subpart FF - National Emission Standard for Benzene Waste Operations
- Applicable if:
 - The site is a chemical manufacturing plant, coke byproduct recovery plant or a petroleum refinery
 - Has a facility that treats, stores, or disposes of hazardous wastes that contain benzene
 - The site has a total annual benzene quantity of 10 Mg/yr from facility waste



Louisiana Administrative Code



- LAC 33:III.2153 – Subchapter M, Limiting VOC Emissions from Industrial Wastewater
- Applicable if:
 - Located in parishes of Ascension, East Baton Rouge, Iberville, Livingston, and West Baton Rouge with the potential to emit 25 TPY or more of VOC
 - Or is located in the parishes of Calcasieu and Pointe Coupee and having the potential to emit 50 TPY or more of VOC
 - And manufactures: organic chemicals, plastics, synthetic fibers, pesticides, pharmaceuticals, or treat, stores, or disposes of hazardous wastes.

HON Wastewater

“Wastewater are streams that contains either an annual average concentration of Table 9 compounds of at least 5 parts per million by weight and has an annual average flow rate of 0.02 liter per minute or greater, or has an annual average concentration of Table 9 compounds of at least 10,000 parts per million by weight at any flow rate, and that is discarded from a chemical manufacturing process unit that meets all of the criteria specified in §63.100 (b)(1) through (b)(3) of this subpart. Wastewater is process wastewater or maintenance wastewater.”

MON Wastewater

“*Wastewater* means water that is discarded from an MCPU or control device through a POD and that contains either: an annual average concentration of compounds in tables 8 and 9 to this subpart of at least 5 ppmw and has an annual average flowrate of 0.02 liters per minute or greater; or an annual average concentration of compounds in tables 8 and 9 to this subpart of at least 10,000 ppmw at any

Wastewater stream means a stream that contains only wastewater as defined in this paragraph”

BWON Wastewater

“*Waste* means any material resulting from industrial, commercial, mining or agricultural operations, or from community activities that is discarded or is being accumulated, stored, or physically, chemically, thermally, or biologically treated prior to being discarded, recycled, or discharged.

Waste stream means the waste generated by a particular process unit, product tank, or waste management unit. The characteristics of the waste stream (e.g., flow rate, benzene concentration, water content) are determined at the point of waste generation. Examples of a waste stream include process wastewater, product tank drawdown, sludge and slop oil removed from waste management units, and landfill leachate.”

LAC Wastewater

“VOC wastewater stream from an affected source category with either a VOC concentration greater than or equal to 10,000 parts per million by weight (ppmw) or a VOC concentration greater than or equal to 1000 ppmw and a flow rate greater than or equal to 10 liters per minute (2.64 gallons per minute)”

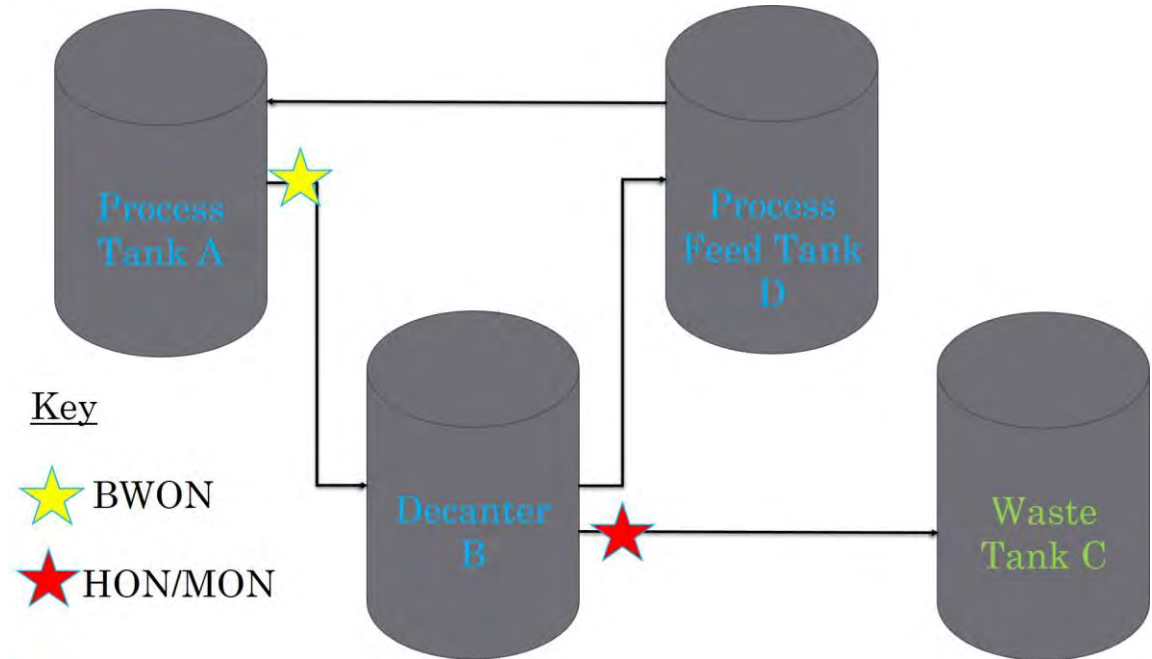
Accepting Differences

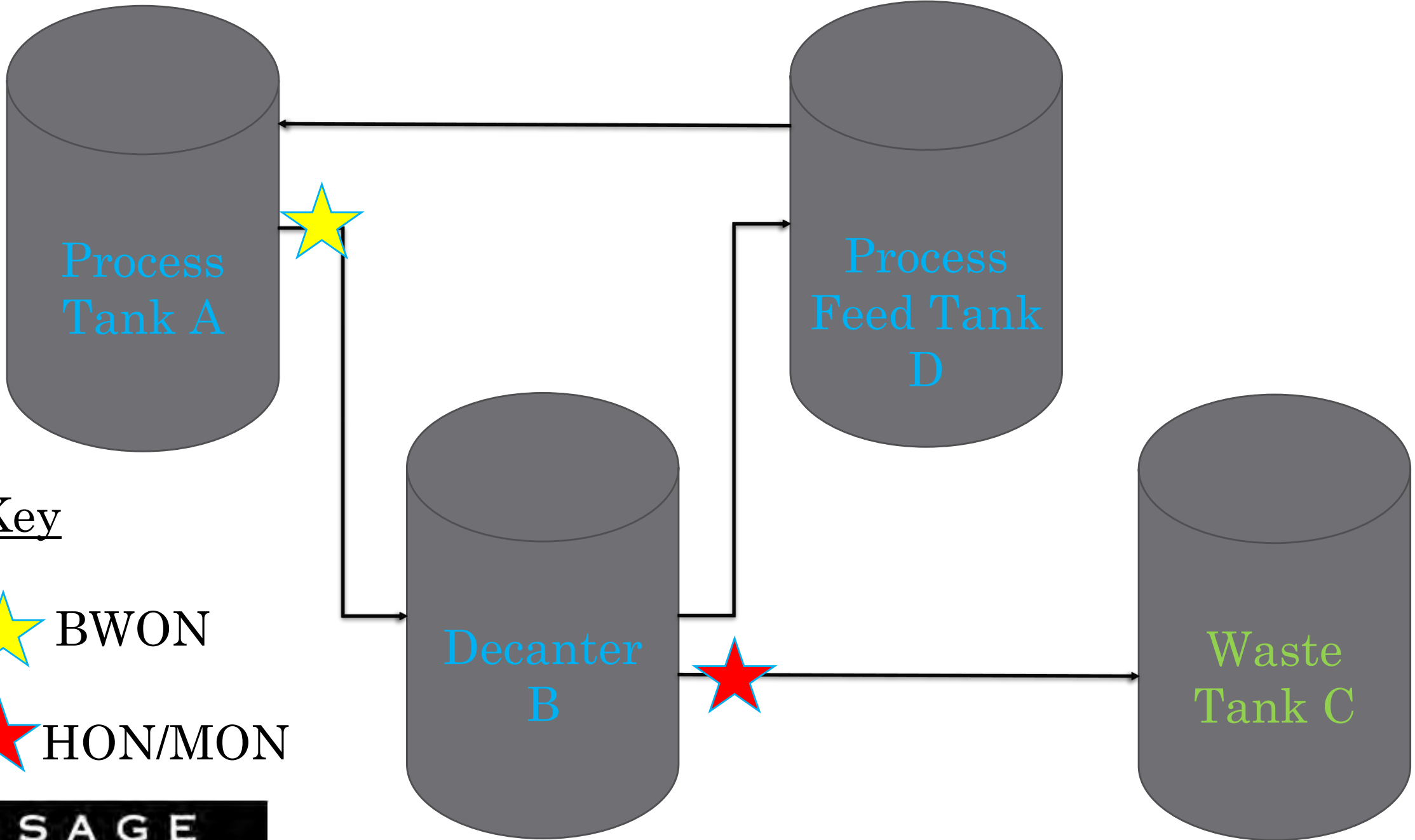
- A facility can be applicable to multiple rules
- Look out for similar but very different requirements
- Keep records on which limits are for which rule.
- Can be in compliance with one rule and out of compliance for another.



Major Confusion

- Big Differences
 - Point of Generation or Point of Determination
 - Recycle Streams count, or do they?
 - Waste tanks?





Key

★ BWON

★ HON/MON

Monitoring and Inspection Frequencies

	HON	MON	LAC	BWON
Equipment	Monitoring Frequency	Monitoring Frequency	Monitoring Frequency	Monitoring Frequency
Containers	(1) NDE - Initially, Semi-annually		(1) Visual – Initially, Weekly	(1) NDE - Initially, once per year (2) Visual - Initially, Once per quarter
Individual Drain Systems	(1) NDE - Initially, Semi-annually (2) Visual - Initially, Monthly	(1) NDE - Initially, Semi-annually (2) Visual - Initially, Monthly	(1) Visual – Initially, Semi-annually	(1) NDE - Initially, once per year (2) Visual - Initially, Once per quarter
IDS - Funnels/ Water Seals	(1) NDE - Initially, Semi-annually (2) Visual - Initially, Weekly	(1) NDE - Initially, Semi-annually (2) Visual - Initially, Weekly	(1) Visual – Initially, Semi-annually	(1) NDE - Initially, once per year (2) Visual - Initially, Once per quarter
Junction box	(1) NDE - Initially, Semi-annually (2) Visual - Initially, Monthly	(1) NDE - Initially, Semi-annually (2) Visual - Initially, Monthly	(1) Visual – Initially, Semi-annually	(1) NDE - Initially, once per year (2) Visual - Initially, Once per quarter



Monitoring and Inspection Frequencies

	HON	MON	LAC	BWON
Equipment	Monitoring Frequency	Monitoring Frequency	Monitoring Frequency	Monitoring Frequency
Oil-water separators	(1) Initially (2) Semiannually (3) Fixed roof seal gaps measured within 60 calendar days of initial installation, or 60 days after equipment is placed back into service. (4) Floating roof measurement of primary seal within 60 calendar days after installation, once every 5 years thereafter; secondary seal within 60 days of installation, every year thereafter	(1) Initially (2) Semiannually (3) Fixed roof seal gaps measured within 60 calendar days of initial installation, or 60 days after equipment is placed back into service. (4) Floating roof measurement of primary seal within 60 calendar days after installation, once every 5 years thereafter; secondary seal within 60 days of installation, every year thereafter	(1) Visual – Initially, Monthly	(1) NDE - Initially, once per year (2) Visual - Initially, Once per quarter
Fixed Roof Wastewater Tanks	(1) Initially (2) Semiannually	(1) Initially (2) Semiannually	(1) Visual – Initially, Semi-annually	(1) NDE - Initially, once per year (2) Visual - Initially, Once per quarter
Internal Floating Roof Wastewater Tanks	(1) Initially (2) Semiannually	(1) Initially (2) Semiannually	(1) Visual – Initially, Annually for Primary Seals (2) Visual – Initially, Semi-annually for Primary Seals	(1) NDE - Initially, once per year (2) Visual - Initially, Once per quarter
External Floating Roof Wastewater Tanks	(1) Initially (2) Semiannually	(1) Initially (2) Primary seals - once every 5 years (3) Secondary seal - annually	(1) Visual – Initially, Annually for Primary Seals (2) Visual – Initially, Semi-annually for Primary Seals	(1) NDE - Initially, once per year (2) Visual - Initially, Once per quarter

Monitoring and Inspection Frequencies

	HON	MON	LAC	BWON
Equipment	Monitoring Frequency	Monitoring Frequency	Monitoring Frequency	Monitoring Frequency
Closed-vent system and control devices	<p>(1) For hard-piping or ductwork, conduct initial inspection then annual inspections for indications of leaks</p> <p>(2) If under negative pressure, do not have to comply with above statement</p>	<p>(1) For hard-piping or ductwork, conduct initial inspection then annual inspections for indications of leaks</p> <p>(2) If under negative pressure, do not have to comply with above statement</p>		<p>(1) NDE - Initially, once per year</p> <p>(2) Visual - Initially, Once per quarter</p>
Control Devices	(1) Visual - Monthly inspections			<p>(1) NDE - Initially, once per year</p> <p>(2) Visual - Initially, Once per quarter</p>

Summary



- A facility can be applicable to multiple rules
- Look out for similar but very different requirements
- Keep records on which limits are for which rule.
- Can be in compliance with one rule and out of compliance for another.

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Questions?

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