BWON Compliance in the Post-CD Era

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TYPICAL CONSENT DECREE

BWON TERMS

> DISCOURAGEMENT OF 2-Mg ALTERNATIVE
> REVIEW AND VERIFICATION AUDIT (ONE-TIME FOR ENFORCEMENT IMMUNITY)
  ❖ TAB REVIEW (LIST OF WASTES, QUANTITIES, CONCENTRATIONS)
  ❖ PHASE TWO TO EMPHASIZE ADEQUATE SAMPLING
> CARBON CANISTERS
  ❖ NEAR-PROHIBITION OF SINGLE CANISTERS
  ❖ BREAKTHROUGH DEFINED (FOR SINGLE AND PRIMARY CANISTERS)
  ❖ REPLACEMENT OF PRIMARY WITH SECONDARY
  ❖ MODIFIED FREQUENCY OF PERFORMANCE MONITORING
  ❖ “IMMEDIATELY” DEFINED
> END-OF-LINE EFFORT
  ❖ DOWNSTREAM CONFIRMATION OF BENZENE RESULTS
  ❖ PROGRESSIVE BENZENE TRACKING THROUGHOUT YEAR
  ❖ WASTE SCHEMATICS
  ❖ EMPHASIS ON WASTE OIL, INCLUDING QUANTIFICATION
  ❖ ESTABLISHMENT OF CONTROLLED WASTE MANAGEMENT SYSTEM
  ❖ UPDATES IN RESPONSE TO CHANGES
> ADDITIONAL REPORTS
> OTHER
  ❖ ANNUAL REVIEWS VIA MOC PROCESS
  ❖ LABORATORY AUDITS
  ❖ SPILLS TO MATCH REPORTABLES
  ❖ TRAINING (FOR SAMPLING AND CONTROL EQUIPMENT OPERATION)
  ❖ MORE FREQUENT WATER-SEAL INSPECTIONS
  ❖ MORE FREQUENT API SEPARATOR MONITORING
  ❖ DESIGNATION OF SEGREGATED STORMWATER APPURTEINANCES
  ❖ TRACKING CONSERVATION VENT ACTIVITY
CATEGORIES OF CD BWON TERMS: LEVELS OF CURRENT IMPORTANCE

> Good ideas - Continue these

> Helpful ideas - Consider these

> These have served their purpose
GOOD IDEAS: CONTINUE THESE

> End-of-line effort

> BWON waste schematic

> Carbon canister monitoring
HELPFUL IDEAS: CONSIDER THESE

- BWON waste oil quantification
- More frequent water-seal inspections
- More frequent API separator monitoring
- On-going sampling
- Training
- Tracking conservation vent activity
THESE HAVE SERVED THEIR PURPOSE
(we can let these go)
SO WHAT DO WE REALLY HAVE TO DO?

> Follow the citations
> Comply
QUESTIONS?
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