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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 APPURTENANCES
 - ❖ 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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