

# **HON Compliance Workshop 2025**

Implementing Chemical Industry NESHAP  
and NSPS Updates

New Orleans, Louisiana, USA  
8 - 9 April 2025

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# FINAL PROGRAM

## Technical Program – Tuesday, April 8

7:00 am – 5:00 pm  
Conference Registration

All sessions will be held in the Drury Ballroom A & B

### Opening Keynote Plenary

8:00 am – 9:55 am

Sponsored by our General Sponsor:



#### Welcome and Introduction 1

**Jim Walker**, A&WMA Immediate Past President, Consumers Energy

**Karen Brignac**, Deltech Monomers OpCo LLC, and **Tiffany Dillow**, POWER Engineers, a member of WSP



#### Overview of Key Issues and Next Steps 6

**Brendan Mascarenhas**  
Senior Director, Regulatory  
and Scientific Affairs  
American Chemistry Council



#### Lessons Learned from Refinery MACT Implementation 15

**Derek Reese**, Policy Advisor,  
Policy, Economics, and Regulatory Affairs  
American Petroleum Institute

9:55 am – 10:15 am

Networking Break and Exhibition Viewing – Ballroom C and Foyer  
Breaks are sponsored by our Bronze Sponsors



### Session 1: Introduction to Rule Changes

Session Chairs: Andrew Willing, Braun Intertec; Karen Brignac, Deltech Monomers OpCo LLC

10:15 am – 10:45 am

#### REVISED: Clean Air Act Risk and Technology Review (RTR) Requirements – Background and Process 21

*Philip Crawford, ALL4 Inc.; Brendan Mascarenhas, American Chemistry Council*

10:45 am – 11:15 am

#### HON and P&R I Amendments Overview 33

*Chris Ward, ALL4 Inc.*

11:15 am – 11:45 am

#### One Year In – HON Benchmarking Implementation 63

*Gena Driscoll, Trinity Consultants*

11:45 am – 12:00 pm

Question and answer period

12:00 pm – 1:15 pm

Lunch for all attendees – Drury Dining Room and Courtyard  
Lunches are sponsored by our **Silver Sponsors**

### Session 2: NSPS Changes

Session Chair: Allyson Morales, TotalEnergies Petrochemicals & Refining USA

1:15 pm – 1:45 pm

#### Reviving Your NNN & RRR Compliance post-RTR 75

*Tammy Hartmann, TRICORD Consulting*

1:45 pm – 2:15 pm

#### Compliance Strategies for Tanks (from both HON and NSPS Kc perspective) 96

*Jill Martin, Alliance Technical Group*

2:15 pm – 2:45 pm

#### How to Prepare for LEL Monitoring of IFRs under NSPS Kc 104

*Trey Denney, TRICORD Consulting*

2:45 pm – 2:55 pm

Question and answer period

2:55 pm – 3:15 pm

Networking Break and Exhibition Viewing

# FINAL PROGRAM

## Technical Program – Tuesday, April 8, con't.

### Session 3: Process and Maintenance Vents

Session Chair: Chris Ward, ALL4 Inc.

**3:15 pm – 3:45 pm**

**New and Updated Process Vent and Pressure Relief Device HON Requirements** 115

*Tammy Hartmann, TRICORD Consulting*

**3:45 pm – 4:15 pm**

**23 Maintenance Vent Calculations: Leveraging Limitations to Lower Compliance Cost** 127

*Sarah Backes, JBE*

**4:15 pm – 4:45 pm**

**Temporary Vapor Control Devices during Maintenance Activities to meet the HON Regulations** 140

*Sean Kirkpatrick, Vapor Point*

**4:45 pm – 5:00 pm**

Question and answer period

**5:00 pm – 6:00 pm**  
**Networking Reception**

Visit the exhibitors and sponsors and network with presenters and attendees while enjoying a beverage and light refreshments.

The reception is sponsored by our Gold Sponsors:



## Technical Program – Wednesday, April 9

### Session 4: Flare Requirements

Session Chair: Tiffany Dillow, POWER Engineers, a member of WSP

**8:00 am – 8:30 am**

**HON Flare Compliance** 149

*Herman Holm, Spectrum Environmental Solutions*

**8:30 am – 9:00 am**

**Flare Monitoring and Data Management Challenges** 161

*Eric Swisher, Matt Carideo, ALL4 Inc.*

**9:00 am – 9:30 am**

**Enhanced Tracking of LDAR Actions** 169

*John Beath, JBE*

**9:30 am – 9:40 am**

Question and answer period

**9:40 am – 10:00 am**

Networking Break and Exhibition Viewing

### Session 5: Fenceline Monitoring

Session Chair: Allyson Morales, TotalEnergies Petrochemicals & Refining USA

**10:00 am – 10:30 am**

**HON Fenceline Monitoring (FLM) Implications to Existing FLM Programs** 183

*Hedrick Strickland, TRICORD Consulting*

**10:30 am – 11:00 am**

**HON Fenceline Monitoring Requirements and Lessons Learned from Refinery Sector Rule Implementation** 189

*Jeremy Sell, Trihydro Corporation*

**11:00 am – 11:30 am**

**Lessons Learned for Fenceline Monitoring Associated with an Information Collection Request (ICR)** 199

*Kyle Hunt, ALL4 Inc.*

**11:30 am – 12:00 pm**

**Alternative Test Methods and Real-time Monitoring to Complement Passive Fenceline Requirements** 208

*Doug Goetz, Clean Air Engineering*

**12:00 pm – 12:10 pm**

Question and answer period

# FINAL PROGRAM

## Technical Program – Wednesday, April 9, con't.

**12:10 pm – 1:30 pm**

Lunch for all attendees – Drury Dining Room and Courtyard  
Lunches are brought to you by our **Silver Sponsors**



PICARRO



### Session 6: Ethylene Oxide

Session Chair: Tiffany Dillow, POWER Engineers, a member of WSP

**1:30 pm – 2:00 pm**

**EPA Method 327 – Navigating New Territory in Fenceline Monitoring** 221

*Bryan Tyler, Enthalpy Analytical*

**2:00 pm – 2:30 pm**

**Automated Fenceline Solutions for the US EPA Hazardous Organic NESHAP (HON) Regulation** 229

*Gilad Shpitzer, Atmosfir Optics*

**2:30 pm – 3:00 pm**

**Ethylene Oxide Requirements and How it Affects Your Facility** 243

*Gena Driscoll, Trinity Consultants*

**3:00 pm – 3:30 pm**

**LDAR Implications of the New EtO HON Delay of Repair Amendments** 254

*James Walsh, TRICORD Consulting*

**3:30 pm – 4:00 pm**

**Identifying, Verifying, and Designating Sources in Ethylene Oxide (EO) Service** 261

*Chris Ward, ALL4 Inc.*

**4:00 pm**

Workshop Conclusion and Wrap-up

**Thank you for attending!**



### About the Air & Waste Management Association

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