

# HON Compliance Workshop

Implementing Chemical Industry NESHAP and NSPS Updates



April 8-9, 2025  
New Orleans, LA

## Call for Presenters

The Air & Waste Management Association HON Compliance Workshop will address, in detail, the recently revised Hazardous Organic NESHAP (HON) provisions as well as other recently issued and/or revised chemical industry standards including the NESHAP for Group I Polymers and Resins, New Source Performance Standards (NSPS) [40 CFR 60] subparts VVb for equipment leaks, IIIa for air oxidation, NNNa for distillation, RRRa for reactors, and Kc for storage tanks.

The technical program will include keynote and panel discussions, plus individual sessions on all parts of the rules involving rule writers, trade association representatives, technical and regulatory experts, and monitoring/instrument specialists.

If you are a HON expert or have experience implementing revised standards associated with the recent refinery and chemical industry NESHAP risk and technology reviews (refinery sector rule, ethylene MACT, miscellaneous organic NESHAP, organic liquids distribution MACT) that came before this rulemaking, **please share your knowledge and become a presenter!**

Each session will dissect individual requirements in the rules and explain them in an easily digestible format with the goal that attendees leave the workshop equipped with the right knowledge to develop and execute their compliance plans. We also envision having case studies presented for sharing real-world experiences, challenges, and solutions. Each presenter will be expected to speak for 30 to 45 minutes to allow a deep dive into each section of the regulations.

**Proposals are due December 18, 2024.**

### Suggested topics include:

- Clean Air Act technology and risk review requirements, and the risk review process
- **40 CFR Part 63 Subpart F:**
  - Heat exchange system monitoring change to require use of the Modified El Paso method
  - New flare requirements
  - Additional stringency for controlling equipment “in ethylene oxide service” (compliance required by July 2026!)
  - Procedures for determining whether equipment is “in ethylene oxide service”
- **40 CFR Part 63 Subpart G**
  - Changes to the criteria for determining the group status of process vents , including removal of the total resource effectiveness (TRE) concept
  - Startup, Shutdown, and Malfunction (SSM) exemption revocation and new requirements for pressure relief devices, maintenance vents, and control device bypasses

- Changes to the criteria for determining the group status of storage vessels, newly added storage tank degassing requirements, and revised control requirements for floating roof tanks
- Transfer rack operating pressure exemption lifted
- New monitoring requirements for non-regenerative carbon adsorption systems
- Performance testing requirements and strategies
- New dioxins and furans standard for Group 1 process vents that contain chlorine, hydrogen chloride, or other chlorinated compounds.
- **40 CFR Part 63 Subpart H**
  - Fenceline Monitoring Requirements / Experiences / Equipment Overview (compliance required by July 2026!)
  - Revised threshold for controls on surge control vessels and bottoms receivers, including removal of the option to utilize a floating roof for compliance.
- **40 CFR Part 63 Subpart F, G, and H:** Recordkeeping and reporting requirements including use of CEDRI
- **40 CFR Part 63, Subpart U** – New requirements for sources at an Elastomer Product Process Unit that do not reference back to the HON
- **40 CFR Part 60**
  - New Subparts VVb, IIIa, NNNa, and RRRa
  - New Subpart Kc
- **Additional related topics not included here will also be considered!**

**Submit your proposal online by December 18, 2024.** Presenters will have to submit a bio or description of their qualifications and proposal indicating the areas they would like to cover. Presentations must be devoid of promotional content; and discussion of new technology should not focus on a specific manufacturer's instrument. Presentations should have a technical emphasis, be evidence-based, and detail general methodology and/or solutions. Selected presenters will be notified in January.

#### **Workshop planning committee:**

Karen Brignac, Deltech Monomers Opco LLC  
 Tiffany Dillow, Power Engineers, Inc.  
 Jason Midgett, Placid Refining  
 Allyson Morales, TotalEnergies  
 Chris Ward, All4 Inc.  
 Andrew Willing, 3M

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