

SUBPART BB AIR EMISSION STANDARDS

BACKGROUND

In 1984, Congress passed the Hazardous and Solid Waste Amendment (HSWA), amending the Resource Conservation and Recovery Act (RCRA). Section 3004(n) of RCRA, as amended by HSWA, directs EPA to “promulgate such regulations for monitoring and control of air emissions at hazardous waste treatment, storage, and disposal facilities, as may be necessary to protect human health and the environment.” The Agency has issued a series of regulations to implement the section 3004(n) mandate; these regulations control air emissions from equipment leaks, and can be found at 40 CFR 264.1050 and 40 CFR 265.1050

WHO IS COVERED?

1. A unit that is subject to the permitting requirements of 40 CFR part 270, or
2. A unit (including a HW recycling unit) that is located at a Hazardous Waste Management facility subject to
3. **Generators exempt from permitting under 40 CFR 262.34(a)**

WHAT IS COVERED?

Equipment that contains or comes into contact with waste having an organic concentration of at least 10% by weight. The following equipment is covered: 1. Pumps; 2. Compressors; 3. Pressure relief devices; 4. Sampling connection systems; 5. Flanges and Connectors; 6. Valves; 7. Open-ended valves or lines. This equipment is usually associated with tanks, distillation units, and other waste treatment and storage units.

The equipment is under different standards depending on whether the hazardous waste is in:

1. **Light liquid service:** hazardous waste fluid is a liquid at operating condition, and the vapor pressure of at least one of the components in the stream is greater than 0.3 Kilopascals (Kpa) at 20 degree celsius.
2. **Gas/Vapor service:** hazardous waste is in the gaseous state at operating condition.
3. **Heavy liquid service:** hazardous waste not in gas/vapor, or light liquid state.

Exemption: Equipment in vacuum service (40 CFR 264.1050(e) & 265.1050(d)) or equipment that contains or contacts hazardous waste less than 300 hours/calender year (264.1050(f)&265.1050(e)). Exempt equipment requires documentation/identification per 40 CFR 264.1064(g)(5)-(6)

WHAT IS REQUIRED?

Each piece of equipment to which Subpart BB applies must be marked in such a manner that it can be distinguished readily from other pieces of equipment. Each piece of equipment must also be monitored and inspected according to the required scheduled standards to detect and prevent leaks. All activities concerning monitoring, inspection, and repairs must be documented and kept for 3 years, as part of the recordkeeping requirement.

WHEN DOES IT APPLY?

Since the effective date of subpart CC (emissions from certain tanks, containers, and surface impoundments) on December 6, 1996, generators and all TSD's that manage hazardous waste with organics concentration of at least 10% by weight have become regulated under the subpart BB standards. Equipment must must been in compliance by December 6, 1996.

If you need additional information, or have any questions or concerns, please contact staff of the Compliance Branch, Office of Land Quality, at 317-308-3103. The IDEM toll-free telephone number is 1-800-451-6027.

Quick Reference on Subpart BB Monitoring Standards

	Light liquid services	Gas/Vapor services	Heavy liquid services
Pumps	Monthly inspection	NA	Monitor within 5 calendar days, if evidence of a <u>potential leak*</u> is found
Compressors	Barrier fluid system must be equipped with sensor which should be checked daily/ if the sensor equipped with audible alarm- check monthly	Same as light liquid	Same as light liquid
pressure relief devices	Monitor within 5 calendar days, if evidence of a <u>potential leak</u> is found	No later than 5 Calendar days after the pressure release, the pressure relief device shall be monitored	Monitor within 5 calendar days, if evidence of a <u>potential leak</u> is found
Sampling connecting system	Each connection system must be equipped with a <u>closed-purge</u> or <u>closed-vent system</u>	Same as light liquid	Same as light liquid
Flanges and connectors	Monitor within 5 calendar days, if evidence of a <u>potential leak</u> is found	Monitor within 5 calendar days, if evidence of a <u>potential leak</u> is found	Monitor within 5 calendar days, if evidence of a <u>potential leak</u> is found
Valves or lines	Monthly inspection	Monthly inspection	Monitor within 5 calendar days, if evidence of a <u>potential leak</u> is found
Open-ended valves or lines	Monthly inspection	Monthly inspection	Monitor within 5 calendar days, if evidence of a <u>potential leak</u> is found

Note: ALL EQUIPMENT MUST BE MARKED, INCLUDING ALL FLANGES AND THREADED CONNECTIONS. Alternative standards could be applied only after complying with the requirements of the regular monitoring schedule. The regulations pertaining to these standards are found in 40 CFR 256.1061-1062, and 264.1061-1062.

*Potential leak could be observed by visual, audible, olfactory, or any other detection method.

Caution: The above chart is not a substitute for the subpart BB regulations concerning monitoring schedules, but merely a quick reference/reminder.