

RCRA Subpart CC  
Organic Air Emission Controls  
for Tanks, Surface Impoundments and Containers

*Truth or Consequences*

A Facilitated Case Study By TechLaw, Inc.

**Facility #1**

TSDF Miscellaneous Treatment Unit (MTU) system for treatment of refinery production and remediation wastes, including oily hazardous wastes such as tank bottoms, tank sludge, API separator sludge and contaminated soil from petroleum product spill clean-ups or corrective actions. Identify whether each unit is a container or tank and indicate the appropriate level (C1, C2, C3, T1 or T2).

- A. 40 cubic yard roll off, incoming hazardous waste material, nothing added. (Feeds unit B).
- B. 1,000 gallon steel bin with debris separation screen. (Feeds unit C).
- C. 8 ton/hour rotary kiln-type thermal desorption unit, may be run as batch or continuous feed. (Feeds units D and F).
- D. 10 cubic yard waste stabilization unit, mixing waste with additives such as lime or Portland cement materials to bind up metal constituents in the residuals. (Feeds unit E).
- E. 20 cubic yard roll off receiving waste and additives from stabilization unit. (Feeds offsite landfill).
- F. 500 gallon coalescing oil water separator that receives thermal desorption unit condensate. (Feeds unit G and offsite oil recovery operation).
- G. 20,000 gallon fractionation tank, single wall, storage prior to shipment to off site wastewater treatment facility.

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**Facility #2**

Pretreatment facility for PCB and pesticides at Subtitle C hazardous waste landfill. Waste is F039, landfill leachate. See attached description and sketches. Identify whether each unit is a container or tank and indicate the appropriate level (C1, C2, C3, T1 or T2).

- A. Waste sump.
- B. 7,500-gallon accumulation tank.
- C. Vacuum truck.
- D. 15,000-gallon sedimentation tank. Sludge produced and sent to belt filter press (G).
- E. Three 300-gallon mixing tanks.
- F. 5,000 gallon sedimentation tank. Sludge produced and sent to belt filter press (G).
- G. Belt filter press for sludge thickening. Squeezed out water is returned to 15,000 gallon tank (D). Sludge is placed into 55 gallon drums for off site disposal.
- H. Three 250,000 gallon tanks, used in various capacity for waste storage and surge.

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**Facility #3**

TSDf for treatment of hazardous waste by stabilization or evaporation prior to landfill disposal. See attached drawings. Identify whether each unit is a container or tank and indicate the appropriate level (C1, C2, C3, T1 or T2).

- A. Tanker truck discharge into 2-acre evaporation pond (two subcells of about 1 acre each). See Drawing No. 28.
- B. Four stabilization bins for mixing of hazardous waste with reagents such as lime or cement, located in dust containment structure. See Drawings No. 33 and 34.
- C. Drum handling unit, see Drawing No. 37.
- D. Liquid waste receiving and storage unit consisting of two 9,000 gallon double lined steel tanks with truck receiving station and truck loading station. See Drawing 40, Sheets 1 and 2.

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**Facility #4**

Wastewater treatment plant, 11 million gallons per day/7600 gallons per minute capacity, Treating recovered groundwater for oil/grease, arsenic, chromium (VI), iron, copper, zinc volatile organic compounds (wide variety), phosphates, nitrates and general organic matter represented by biological oxygen demand. Treatment consists of the following steps: preliminary treatment by coalescing oil water separators (COWS); two primary treatment steps consisting each of coagulation, flocculation, settlement and filtration; an activated sludge/biological nutrient removal and filtration secondary treatment step; and a disinfection step. While the treatment plant has a NPDES permit for its outfall and therefore is excluded from Subpart CC, the sludges are not. The following sludges or byproducts are produced:

- A. Oil and grease from the COWS;
- B. Primary settlement sludge from chromium, arsenic, and iron treatment;
- C. Primary settlement sludge from zinc and copper treatment; and,
- D. Secondary sludge from activated sludge treatment of general organic matter, nitrate and phosphates.

Identify whether each unit is a container or tank and indicate the appropriate level (C1, C2, C3, T1 or T2).