

Checklist
Equipment Leak Applications
40 CFR Part 264/265 Subpart BB

1. Applicability 40 CFR 264/5.1050

Is the facility permitted under Part 270 or does it have units permitted under Part 270?

Facility status: interim status or permitted?

If interim status, has the facility submitted a Part B application identifying equipment subject to Subpart BB?

Is the facility a large quantity generator?

What is the effective date for this facility?
(The effective date is generally either 6/21/90, or any date of start-up after 12/21/90, or 12/6/94, or 12/6/96.)

Are any of these units exempt, and if so, why?

2. Waste Streams 40 CFR 264/5.1063(d)

Are there waste streams that contain at least 10% organics by weight?

What was the method of determination?
Knowledge, or analytical methods, such as ASTM Methods D2267-88, E169-87, E168-88, E260-85 or Methods 9060 or 8240?

If knowledge, is it documented?

Date of initial determination:

Dates of other analysis? change, batch

For each waste stream that does qualify, has the facility made a determination of fluid type: gas/vapor service, light-liquid service, heavy liquid service

Method for determining light liquid service:

vapor pressures of constituents from standard texts
ASTM D-2879-86

3. Facility Operating Record 40 CFR 264/5.1064(g)

Does the facility have a list of the equipment and identification numbers that are affected by this rule?

Is there a list of the ID numbers of pumps, valves, and compressors designated as No Detectable Emissions (NDE) with

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signature of owner/operator?

Is there a list of all affected equipment by designation?

Is there a list of pressure relief devices in gas/vapor service?

Does the facility record contain records regarding leak detection and repair as required by 40 CFR 264/5.1064(c and d)?

Check the following:

Date of visual, audible or olfactory indication of leak

Date of leak detection (as above, or monitored?)

First date repair attempted and method(s) used

Date of repair

If repair was delayed, are reasons recorded?

If valve, documentation for repair delay

Is the facility meeting the repair deadlines when leaks are detected? (5 days/15 days)

Does facility record contain dates of testing, including:

Equipment used for leak detection?

Operator's name

Calibration records?

Background level for source?

Maximum instrument reading?

for each piece of equipment tested?

Is the facility using the proper equipment for its monitoring program?

Is there a list of ID numbers for equipment in vacuum service?

Is there a list of ID numbers of 'unsafe-to-monitor' and 'difficult-to-monitor' valves, with explanation for each, and a plan and schedule for monitoring?

Is there a list of valves using the skip period alternative monitoring schedule, with schedule for monitoring and % leaking determined?

For dual mechanical seal pumps or compressors with barrier fluid systems with sensors, is the criteria and explanation of the criteria for determining sensor failure given ?

Is there an analysis of design capacity, influent/effluent for each unit subject to these requirements, and an up-to-date analysis, either by testing or knowledge, to determine if the equipment is covered or not?

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4. Physical Inspection of Equipment or Percentage of Equipment Subject to Subpart BB

Do you note any visual, audible or olfactory indications of leaks? (If so, please flag those for the facility to confirm leaks and/or repair.)

Is equipment subject to Subpart BB marked as being in the LDAR program?

Is there any equipment subject to BB which is not marked?

For any equipment identified as leaking, is there a tag on the equipment noting the date the leak was detected and the date of expected repair?

Are there any open-ended lines which are not capped or double valved?

Identification of Equipment Covered by Rule

<u>Equipment</u>	<u>ID#/Location</u>	<u>Type of Service</u>	<u>Monitoring Frequency</u>
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Pumps

Compressors

Pressure Relief
Devices

Sampling
Connection Systems

Valves

Open-ended Valves
or Lines

Flanges and Other
Connectors