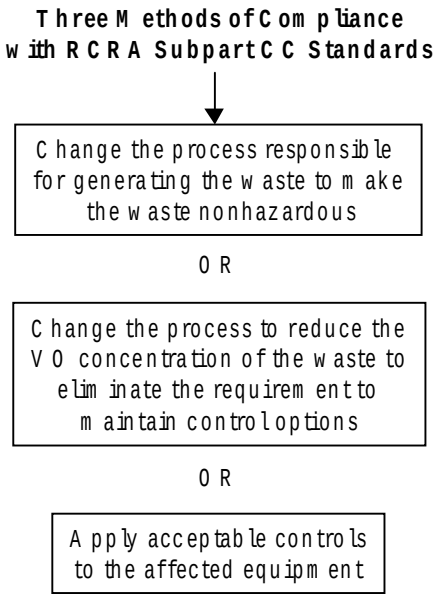
2.8 Compliance Options Overview



Compliance with the RCRA air standards may be achieved by three basic methods:

- Change the process which is responsible for generating the waste to make the waste nonhazardous;
- Change the process that is used at the facility to reduce the volatile organics concentration of the waste below levels which require maintenance of control options; or
- Apply acceptable controls to all affected equipment.

As the RCRA air standards apply only to hazardous wastes, rendering the waste nonhazardous prior to its reaching certain equipment would exempt the unit from the standards. For example, elementary neutralization is a treatment method that can be performed to wastes which exhibit only the hazardous waste characteristics of corrosivity making them nonhazardous. Other process changes may be possible for characteristic hazardous wastes make them nonhazardous characteristic. For hazardous waste with very high concentrations of volatile organics, the volatile organic themselves may be responsible for the classification of the waste as hazardous and some other appropriate treatment option may be required.

Changing the process that is used at the facility to reduce the volatile organics concentration of the waste may be possible. Changes in material usage or changes in distillation, stripping, extraction, or crystallization process conditions may be used to lower the waste's VO content to below the regulatory level at the point of origination. Treatment by one of these methods may eliminate the need to maintain control requirements on units which exist downstream of the treatment. Additional discussion of waste treatment and it's effects on the control requirements needed for units at a facility are provided in the appropriate sections below.

Other compliance strategies may be based on the particular applicability requirements that are presented in the Subparts AA, BB, and CC standards. One possible strategy could be to make other process changes of waste minimization steps so that the regulatory status of facility would be a small quantity generator or conditionally exempt small quantity generator. Another strategy could be to treat the hazardous waste to an exempt unit (e.g., WWTU). The applicability information provided in each of the sections below is useful for designing compliance strategies.