

**2.7 Waste Determination Considerations** Appropriate knowledge of the concentration of organic constituents in the hazardous waste that is managed at a facility is essential to making Subparts AA, BB, and CC compliance determinations. Subpart AA standards apply to certain process vents that manage hazardous wastes with organic concentrations of at least 10 parts per million by weight (ppmw). Subpart BB standards apply to equipment that comes in contact with waste streams that contain 10 percent by weight or greater total organics. Subpart CC standards require that appropriate control be used for air emissions from tanks, surface impoundments, containers and miscellaneous units that manage hazardous waste containing at least 500ppmw volatile organic constituents.

<b>RCRA Air Standard</b>	<b>Affected Equipment</b>	<b>Regulatory Level of Concern</b>
Subpart AA	Process Vents	10 parts per million by weight
Subpart BB	Equipment Leaks	10 percent by weight
Subpart CC	Tanks, Surface Impoundments, and Containers	500 parts per million by weight

*The exemptions for the CAA, mixed waste and other overlapping regulations with the RCRA Organic Air Standards are not clear cut and require investigation to ensure that the hazardous waste management units are using air emission controls and are in compliance with fugitive air emission requirements and limits directly applicable to the unit and the control of volatile organics.*

For each of the Subparts AA, BB, and CC standards, controls generally are required if the equipment that is subject to the rule manages waste with organics concentrations at the point of generation equal to or greater than the regulatory level of concern presented in the standard. Specific waste determination requirements, control requirements, and recordkeeping requirements for each of the standards are described below in Sections 3.0, 4.0, and 5.0.

Subparts AA, BB, and CC standards allow for organics concentrations in the hazardous waste to be determined either by direct measurement (i.e., sampling and analysis) or by applying process knowledge. If direct measurement is used, the sampling must be conducted under a written sampling plan and the samples must be analyzed by one of the analytical methods described in the applicable standard using an appropriate quality assurance program. If process knowledge is used, documentation is required which gives the basis for the process knowledge. Process knowledge documentation may include sources such as manifests, shipping papers, waste certification notices, material balances or compound-specific test data from previous testing at the hazardous waste unit or from other similar processes at other units may be used.