

4.8 Implementation Issues Associated with Subpart BB

Over the past several years, a specially trained team of inspectors from the Indiana Department of Environmental Management has conducted over 50 inspections to evaluate facility compliance with Subparts AA, BB and CC. As a result of the IDEM inspection program, a number of common misconceptions and violations have been identified. In general, IDEM found that most LQGs were not aware of or complying with Subpart BB equipment monitoring requirements. Many facilities believed that they were exempt from Subpart BB because they held various types of general air permits or because they believed that the equipment in questions was part of a manufacturing unit and therefore exempt. In a [May 26, 2000 Policy Memo](#), EPA provided additional guidance regarding the Agency's interpretation of the manufacturing unit exemption. EPA contends that process transfer equipment that is used for both production purposes as well as for the transfer

A model [Subpart BB checklist](#) may be used as a starting point in preparation for a inspection.

of hazardous waste to a hazardous waste storage/ treatment tank, would be considered part of a hazardous waste tank system and therefore subject to the standards for such.

In recent years, there have been a number of Subpart BB enforcement cases against automobile manufacturing facilities. These facilities often generate large volumes of hazardous waste purge solvent from the cleanout of painting systems. In the past, many facilities believed that the solvent was exempt due to the recycling exemption. However, this is not the case. Once the solvent has been used to clean the spray guns and is discharged, the resulting mixture of paint and purged solvent is a hazardous waste. Any pipes, valves pumps etc are subject to both Subparts J and BB. Additional information regarding the applicability of Subpart BB to the operations of car manufacturing facilities is provided in the [Subpart BB and the Automobile Industry](#) presentation from the March 2002 RCRA Organic Air Emission Standards Permit and Compliance Training course.