

## 4.6 Recordkeeping Requirements

For each piece of equipment subject to Subpart BB regulation, the owner or operator must record the following information in the facility operating record:

- the equipment identification number and hazardous waste management unit identification number;
- approximate location of the hazardous waste management unit within the facility;
- type of equipment; percent-by-weight organics; and
- hazardous waste state (i.e., gas or vapor); and methods of compliance.

*EPA Region 4 requires that this information must be included in the facility's Part B permit application and the Region also attaches this information as an appendix to the facilities permit.*

The owner or operator must identify, either by list or location (area or group) of equipment that contains or contacts hazardous waste with an organic concentration of at least 10 percent by weight for a period of less than 300 hours per year.

When a leak is detected the owner or operator is required to tag the piece of equipment with a weatherproof and readily visible identification tag, which is marked with the equipment identification number, the date evidence of a potential leak was found, and the date the leak was detected. This tag may be removed once the leak has been repaired for all equipment except valves. For valves, the tag may be removed after two successive months of monitoring during which no leak is detected.

*An example of [Compliance Methods for Monitoring and Recordkeeping for RCRA Subparts BB and CC](#) is outlined in the presentation by the Eastman Chemical Company*

When the owner or operator uses test data to demonstrate the organic removal efficiency or total organic compound concentration achieved by the control device, a performance test plan must be included in the facility operating record. Documentation of compliance with the requirements for closed-vent systems and control devices according to [40 CFR 264.1060 and 265.1060](#), including the detailed design documentation or performance test results. When a leak is detected a written inspection log must also be kept in the facility operating record.

## RCRA SUBPARTS AA, BB AND CC REGULATIONS BODY OF KNOWLEDGE

---

When a leak is detected a written inspection log must be maintained to include the following information: the instrument and operator identification numbers, the equipment identification number, the date of evidence of a potential leak, the date leak was detected, the dates of each attempt to repair the leak, the repair methods applied during each attempt, the date of successful repair and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak. When completed, the inspection log must be maintained in the operating record for three years.

If a repair is not effected within 15 days, a record must be maintained which states “repair delayed” that provides the reason for the delay and is signed by the owner or operator. The record must contain the estimated date for the completion of the repair and the date of successful repair, once accomplished.