

4.5 Waste Determination

Method 21 requires the use of a photo or flame ionization detector (PID or FID) to meet certain performance criteria. Personnel using these monitoring instruments must be trained to properly calibrate and use the device and be aware of the proper techniques and applications. Monitoring results must be accurately interpreted to assure compliance with regulatory compliance. Information regarding the training program for facility personnel performing the monitoring should be addressed in the facility's permit application and in the operating log.

Leak detection monitoring and no detectable emissions determinations in compliance with Subpart BB standards must take place in accordance with Method 21. Applicability determinations for equipment that may be subject to Subpart BB standards must be made in accordance with the facility waste analysis plan required by 40 CFR 264.13(b) and 265.13(b). Once collected according to the waste analysis plan, the samples must be analyzed using American Society for Testing and Materials (ASTM) Methods D 2267-88, E 169-87, E 168-88, E 260-85 or *SW-846 Methods 9060 or 8260*. Process knowledge may also be used to determine the applicability of Subpart BB standards. The basis for the process knowledge must be well documented. Examples of documentation that may be used to support a determination include production process information documenting that no organic compounds are used, information that the waste is generated by a process that is identical to a process at the same or another facility previously demonstrated by direct measurement to have a total organic concentration less than 10 percent. Process knowledge may not be used to revise a determination that an affected piece of equipment is no longer subject to the rule based on the equipment no longer containing or coming into contact with hazardous waste with an organic concentration of 10 percent by weight.

Vapor determinations to determine if a pump or a valve is in light liquid service may be made either by using standard reference texts to obtain the vapor pressure of each of the constituents in the waste or using ASTM Method D 2879-86.

RCRA SUBPARTS AA, BB AND CC REGULATIONS BODY OF KNOWLEDGE

*Chapter 5 in the APTI Course 380:
[Introduction to Fugitive Emissions](#)
provides additional guidance on
Method 21.*

Performance tests to determine if a control device achieves 95 weight percent organic emission reduction must comply with Subpart AA requirements.