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 manfacturing facilties. These facilties often generate large volumes of hazardous waste purge solvent from the cleanout of painting systems. In the past, many facilties believed that the solvent was exempt due to the recycling ememption. 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 facilties 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.

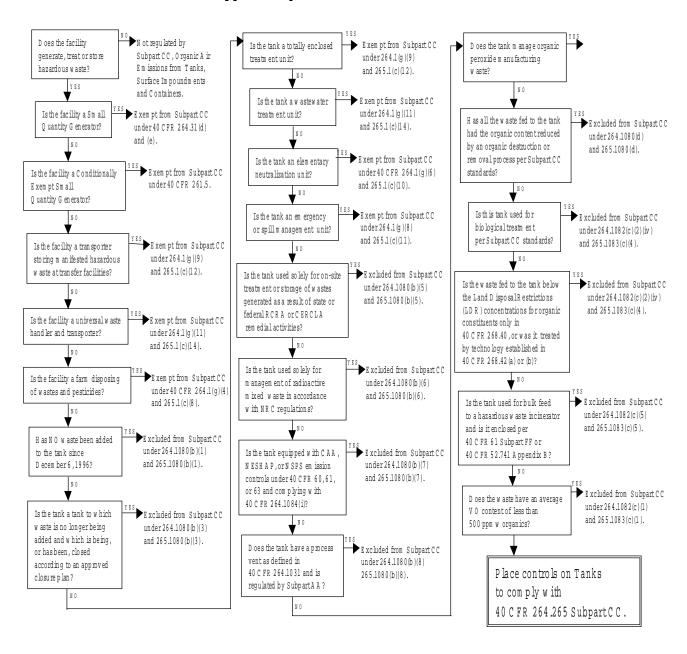
5.0 SUBPART CC STANDARDS

5.1 Applicability

Applicability considerations for in the Subpart CC standards are provided in the following three decision trees. Decision Tree No. 1 may be used to determine if Subpart CC standards apply to tanks at a facility, Decision Tree No. 2 may be used for containers, and Decision Tree No. 3 may be used for surface impoundments. The descriptions of the exemptions and exclusions presented in the decision trees are abbreviated. Additional description of the exemptions and exclusions contained in the decision trees are provided above in Section 2.6 and in the Code of Federal Regulations. The exclusions that are identified in the decision trees do not affect the requirement to maintain appropriate records which provide information on the basis and documentation of the exclusion that is applied to the unit.

The following list indicates the different waste determination requirements for tanks, surface impoundments and containers.

Applicability Decision Tree No.1 for Tanks



Applicability Decision Tree No.2 for Containers

