

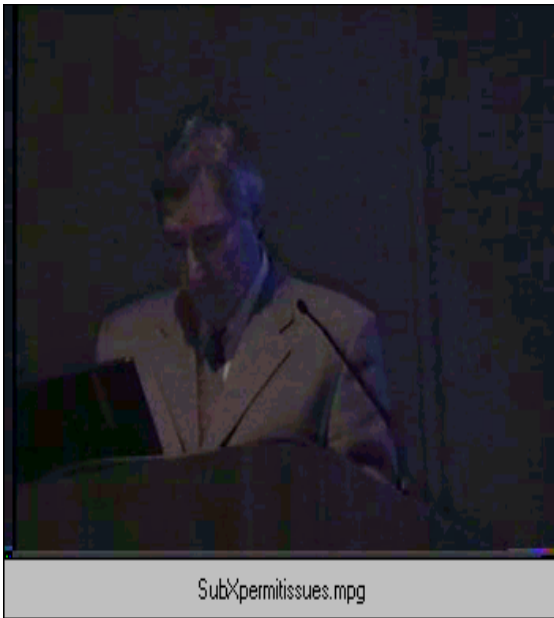
6.0 IMPLEMENTATION ISSUES WITH SUBPART CC

One of the major implementation issues associated with Subpart CC and the other RCRA Organic Air Emission Standards is the lack of detailed permit conditions. Often times the permit condition states simply that the facility must comply with Subparts AA, BB and CC. This is not sufficient. Permit conditions must be unit specific. EPA Region 4 has developed a [Model Permit](#) to be used as a starting point for developing site-specific permit conditions. In addition, an example of a [site specific permit from EPA Region 8](#) has also been provided.

Another issue is the lack of facility awareness regarding the regulations. Often, the facility mistakenly believes that units are exempt from the regulations due to overlap with the CAA or other RCRA exemptions. These units are often not identified in the permit application or go unnoticed until an inspection. EPA Region 2 has developed a [3007 Information Request](#) which may be useful in identifying those units which require permitting. Another tool that has been developed for the permit writer is a template of [notice of deficiency comments](#) which may be used during the permit application review process to obtain additional information.

Lastly, many facilities are not aware that the RCRA Subpart CC regulations also apply to Subpart X or miscellaneous units. Subpart X units need to be considered from a total emissions or mass-balance standpoint when evaluating controls. A single waste stream into a Subpart X unit can create several waste, air or other side streams which need to be evaluated for the unit's impact on human health and the environment. For example, if the Subpart X unit is similar to a tank, and the tank standards (only) are applied, the permit writer may be ignoring the air emissions from the side streams which would not exist if it were not for the Subpart X unit. Under these circumstances, the permit writer has the authority to require control of the emissions, which in many cases are quite significant. Quantification of all emissions by the facility may identify side streams which require air emission control, which can then be controlled by specific language in the RCRA permit.

The air emissions associated with waste transfers need to be considered in detail when establishing permit conditions. Waste transfers can be a large source of air emissions, and both Subpart X and the Omnibus authority give permit writers the authority needed to control the emissions. Due to the significant potential for leaks from units operated under pressure, leak detection monitoring should be required on a frequent basis, and repair of leaks required consistent with the schedule in



Subpart BB. This will result in greater human health and environmental protection at RCRA facilities.

Remember that Subpart X requires that all media be addressed for impacts, so if the air emission standards are not appropriate toward the unit but releases may be a concern, then the air assessment can address the issues.

To hear more about Subpart X and Subpart CC click on the highlighted text [Subpart X Permit Issues](#).