

5.3.6 Recordkeeping Requirements

Additional information regarding the recordkeeping requirements for Subparts nd CC can be found in [General Recordkeeping and Reporting Guidance for Waste Management Units Requiring Air Emission Controls Under RCRA Air Standard Subpart CC](#).

The owner or operator must prepare and maintain records for each tank using air emission controls in accordance with Subpart CC regulations (265.1085). The records must include a tank identification number. Records of each inspection must be kept by the owner or operator for at least three years. Inspection records must include the date of the inspection and information for each defect that was detected during the inspection including the location of the defect, a description of the defect, the date of detection, and the corrective action taken to repair the defect. For defects not repaired within 45 calendar days, the owner or operator must record the reason for the delay and the date of that completion of the repair is expected.

If the Tank Level 1 Control option (fixed-roof tank) is used the owner or operator must keep on record the vapor pressure determination of the waste for each tank. The records must include the date and time the samples were collected, the analysis method used and the analysis results. This determination must be performed before the waste is placed into the tank and at any time the conditions change that would increase the vapor pressure of the waste.

When an internal floating roof is used to comply with Tank Level 2 control, the owner or operator must prepare and maintain documentation describing the floating roof design. Owners or Operators using an external floating roof to comply with Tank Level 2 control must prepare and maintain

documentation describing the floating roof design and the dimensions of the tank. Records of each seal gap inspection describing the results of the seal gap measurements must also be maintained for at least three years. The records must include the date that the measurements were performed, the raw data obtained for the measurement, and the calculation of the total gap surface area. When the seal gap measurements exceeded the specifications outlined in 40 CFR 265.1085(f)(1) the records must include a description of the repairs that were made, the date the repairs were made, and the date the tank was emptied, if necessary.

If an enclosure is used to comply with the Tank Level 2 control requirements the owner or operator must prepare and maintain records of the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria outlined in "Procedure T." Certification that is signed and dated by the owner or operator stating that the control device is designed to operate at the performance level (reduction of organics by at least 95 percent) must be maintained by the owner or operator. If a design analysis is used, then design documentation as specified in 40 CFR 265.1035(b)(4) and must be included. The documentation must include information prepared by the owner or operator or provided by the control device manufacturer or vendor that describes the control device design in accordance with 40 CFR 265.1035(b)(4)(iii) and certification by the owner or operator that the control equipment meets the applicable specifications. If performance tests are used, the performance test plan and all test results must be maintained in the facility records.

A Practical Guide to a State BB/CC Inspection Program presentation from the EPA Region 4 RCRA Organic Air Emission Standards Permit and Compliance Training Course provides additional information on Subpart CC tank inspections.

The owner or operator must record on a semiannual basis, information on planned routine maintenance operations that would require the control device not to meet the requirements of 265.1088(c)(1). Also, records must be maintained which provide a description of the planned routine maintenance which is anticipated for the control device during the next six month period. This information must include the type of maintenance necessary, planned frequency of maintenance, and lengths of maintenance periods. A description of the planned routine maintenance that was performed for the control device during the previous six month period must be maintained. This description must include the type of maintenance performed and the total number of hours during those six months that the control device did not meet the requirements of 265.1088(c)(1).

RCRA SUBPARTS AA, BB AND CC REGULATIONS BODY OF KNOWLEDGE

The owner or operator is required to record information regarding unexpected control device system malfunctions that would require the control device not to meet the requirements of 265.1088(c)(1). This information must include the occurrence and duration of each malfunction of the control device system. The duration of each period during the malfunction when gases, vapors, or fumes are vented from the waste management unit through the closed-vent system to the control device while the control device was not properly functioning. Actions taken during the periods of malfunction to restore a malfunctioning control device to its normal or usual manner of operation must be recorded. Records of management of carbon removed from a carbon adsorption system must be maintained.