

### **7.1.5 Air Emission Requirements (Subparts AA, BB and CC)**

Air emission conditions should only be included if they are applicable to the unit design. 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. General self-implementation conditions can be written to cover future new standards that are promulgated. Specific permit conditions should be written rather than making a general condition which states that the permittee must comply with the Subpart AA, BB and CC conditions.

*Example Subpart AA, BB and CC permit conditions are presented in [Attachment 7-4](#).*