

**CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS****SECTION N. SUBPART BB EQUIPMENT LEAKS**

<b>Section and Requirement</b>	<b>Federal Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
N-1a      Applicability	270.14(a); 270.25; 264.1050(b),(d)	Except as otherwise specified, this subpart applies to equipment that contains or contacts hazardous waste with organic concentrations of at least 10 percent by weight that are managed in one of the following: if these operations are conducted in; a unit subject to the permitting requirements of 270; a unit (including a hazardous waste recycling unit) that is not exempt from permitting under 262.34(a) and is located at a hazardous waste management facility otherwise subject to permitting requirements; and a unit that is exempt from permitting under 262.34(a) such as a 90-day tank or container.		
N-1b      Definition of Equipment	270.14(a); 270.25; 264.1031; 264.1051	Examples include: valve, pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, or flange.		
N-1c      Equipment in a Vacuum or Equipment that Contains or Contacts Hazardous Waste with an Organic Concentration of at Least 10 Percent by Weight for a Period of Less than 300 Hours per Calendar Year is Excluded from Requirements at 264.1052 to	270.14(a); 270.25; 264.1050(f)	Equipment shall be identified in a log in facility's operating record as required by 264.1064(g) in order to qualify for exclusion.		

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264.1060.				
N-2a Monthly Monitoring for Leaks	270.25(d); 264.1052(a) (1)			
N-2b Visual Inspection for Pump Seal Leakage on a Weekly Basis	270.25(d); 264.1052(a)(2)			
N-2c Leak Detection	270.25(d); 264.1052(b); 264.1063	Leak detected if: (1) leak detection instrument reads 10,000 parts per million (ppm) or greater, or (2) there are indications of liquid dripping from the pump seal.		
N-2d Leak Repair as Soon as Practicable	270.25(d); 264.1052(c); 264.1059	Repairs are to be made within 15 calendar days after detection. Repair extensions are allowed under conditions specified in 264.1059.		
N-2e Specific Exceptions to these Standards	270.25(d); 264.1052(d - f)	Exceptions to these standards are dual mechanical seal systems or no detectable emissions.		
N-3a Barrier Fluid Pressure Greater than the Compressor Stuffing Box Pressure	270.25(d); 264.1053(b) (1)			
N-3b Barrier Fluid System Connected by a Closed-Vent System to a Control Device as Described in Subpart AA	270.25(d); 264.1053(b) (2)			
N-3c No Detectable Atmospheric	270.25(d);			

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Emissions of Hazardous Contaminants from the Barrier System	264.1053(b)(3)			
N-3d Sensors Checked Daily or an Audible Alarm Checked Monthly	270.25(d); 264.1053(d - c)			
N-3e Leak Detection	270.25(d); 264.1053(f)	A leak is detected if sensor indicates failure of: (1) seal system, or (2) barrier fluid system.		
N-3f Leak Repair as Soon as Practicable	270.25(d); 264.1053(g)(1); 264.1059	Repairs are to be made within 15 calendar days after detection. Repair extensions are allowed under conditions specified in 264.1059.		
N-3g Specific Exceptions to these Standards	270.25(d); 264.1053(h - i)	Exceptions to these standards are certain closed vent systems or no detectable emissions.		
N-4a Except During Pressure Releases, No Pressure Relief Device Shall Release Detectable Emissions	270.25(d); 264.1054(a)	Emissions shall be less than 500 ppm above background levels.		
N-4b Within 5 Calendar Days after a Pressure Release, No Detectable Emissions Shall Emanate from Pressure Released Device	270.25(d); 264.1054(b)	Emissions shall be less than 500 ppm above background levels.		
N-4c Specific Exceptions to These Standards	270.25(d); 264.1054(c)	Exceptions to these standards are certain closed vent systems.		
N-5a Each Sampling Connecting System	270.25(d);	Each closed-purge, closed-loop, or		

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Shall Be Equipped with a Closed-Purge, Closed Loop, or Closed-Vent System. Closed-Vent Systems and Control Devices are also Subject to 264.1033	264.1055(a - b); 264.1060	closed-vent system shall either: (1) return purged process fluid directly to process line, (2) collect and recycle purged process liquid, or (3) be designed and operated to capture and transport all purged process fluid to a waste management unit or control device that satisfies applicable requirements.		
N-5b Exemption for Qualified Sampling Systems	270.25(d); 264.1055(c)	In situ sampling systems and sampling systems without purges are exempt from requirements of 264.1055(a),(b).		
N-6a Open-Ended Valve or Line	270.25(d); 264.1056(a), (c)	A double block or bleed system must comply with the open-ended valve or line requirements.		
N-6b Second Valve	270.25(d); 264.1056(b)	A second valve shall be operated such that primary valve shall be closed before second valve is opened.		
N-7 Monitoring Schedule Based on Detection of Leaks and Predetermined Schedule	270.25(d); 264.1057(a - e)	A reading of 10,000 ppm denotes a detected leak.		
N-7d Specific Exceptions to the Monitoring Schedule	270.25(d); 264.0157(f - h); 264.1061; 264.1062	Exceptions to schedule include unsafe-to-monitor valves, no detectable emissions, and difficult-to-monitor valves.		
N-8a Monitoring	270.25(d); 264.1058(a);	Monitoring is required within 5 days after leak is found by sight, sound, smell, or		

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		264.1063(b)	other detection method.		
N-8b	Leak Detection	270.25(d); 264.1058(b)	A leak is detected if a leak detection instrument reads 10,000 ppm or greater.		
N-8c	Leak Repair as Soon as Practicable	270.25(d); 264.1058(c); 264.1059	Repairs are to be made within 15 calendar days after detection. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected. Repair extensions are allowed under conditions specified in 264.1059.		
N-8d	Any Connector that is Inaccessible or is Ceramic or Ceramic-Lined is Exempt from the Monitoring Requirements of 264.1058(a) and 264.1064	270.25(d); 264.1058(e)	Examples of ceramic-lined connectors include porcelain, glass, or glass-lined connectors.		
N-9	Specific Allowances for Delay of Repair for Various Types of Equipment	270.25(d); 264.1059			
N-10	When Closed-Vent Systems and Control Devices are Used, they Must Comply with the Requirements in Subpart AA	270.25(e); 264.1033; 264.1060			
N-11	An Owner/Operator may Elect to Comply with this Alternative Monitoring Program	270.25(e); 264.1061	No greater than 2 percent of the valves are allowed to leak per monitoring period.		
N-12	An Owner/Operator may Elect to	270.25(e);	Relief of monitoring frequency is allowed		

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Comply with this Alternative Work Practice	264.1062	if less than 2 percent of the valves are leaking.		
N-13 Owner Complies with Recordkeeping Requirements	270.25(a); 264.1064	Depending on the type of requirement, various records must be maintained in the facility operating record.		
N-13a Semiannual Report	270.25(a); 264.1065	A semiannual report is only required if leaks from equipment have gone unrepaired or a control device operates outside the design specifications.		
N-13b Implementation Schedule	270.25(b)	An implementation schedule shall be provided if facility cannot install closed-vent system and control device to comply with provisions of Part 264, Subpart BB on the effective date that facility becomes subject to provisions of Parts 264 and 265.		
N-13c Performance Test Plan	270.25(c)	A performance test plan shall be provided if the owner/operator applies for permission to use a control device for other than a thermal vapor incinerator, flare, boiler, process heater, condenser, or carbon adsorption system and chooses to use test data to determine the organic removal efficiency achieved by the control device.		

Notes:

- a
- Considerations in addition to the requirements presented in the regulations.
- b
- For each requirement, this column must indicate one of the following: NA for not applicable, IM for information missing, or the exact location of the information in the application.
- c
- If application is deficient in an area, prepare a comment describing the deficiency, attach it to the checklist, and reference the comment in this column.