INSPECTION CHECKLIST

AIR EMISSIONS STANDARDS

FOR

TANKS, SURFACE IMPOUNDMENTS AND CONTAINERS

(Part 264/265 Subpart CC)

Note: Does not apply to satellite accumulation areas, containers less than 26 gal or small quantity generators.

Name of Facility --

Location of Facility --

Date of Inspection --

Name of Inspector --

A. General

1. If the facility claims that the Subpart CC regulations are not applicable to their waste management unit(s) or that the unit(s) are exempt from regulation, explain the reason for the claim.

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B. Waste Determination

265.1084(a)(1)

1. Does the facility determine the VOC content of its hazardous waste at the point of waste origination? yes no

265.1084(a)(2)

If yes, does the facility determine the VOC content of its hazardous waste by (a) direct measurement or (b) using knowledge of the waste (circle one)?

265.1084(a)(4)(i)
If (b), has the facility prepared and maintained records showing the information used as the basis for the O/O's knowledge of the hazardous waste stream's average VOC concentration? yes no

265.1084(a)(3)(ii)(B)

2. Were at least four representative samples collected within a year to determine VOC content? yes no N/A

3. Does the facility perform any other waste determinations as required by the Subpart CC regulations? yes no

   If yes, describe:

   _____

   _____

_____

C. Tanks (40 CFR §265.1085)

skip this section if the facility does not use tanks for waste management

1. Which of the following emissions control devices does the facility employ for its tanks that manage hazardous waste with a VOC concentration >500 ppmw (circle appropriate ones)

   a. fixed roof (Level 1 control (265.1085(c)))

   b. fixed roof equipped with an internal floating roof (Level 2 control (265.1085(d)))

   c. external floating roof (Level 2 control)

   d. tank vented through a closed vent system to a control device (Level 2 control)

e. pressure tank (Level 2 control)

f. tank located inside an enclosure that is vented through a closed-vent system to an enclosed combustion control device (Level 2 control)

g. other

h. none

If (g) other, describe:

_____

_____

2. Does it appear as though the device(s) being used is designed and operated properly (i.e., no emissions were likely to occur)? yes no N/A

If no, describe:

_____

_____

_____

265.1084(c)(1)

3. If a fixed-roof tank (Level 1 control) is used for storage of a hazardous waste with >500 ppmw VOC, is the maximum vapor pressure of the waste determined and the results maintained in the facility's records? Yes No N/A

265.1085(b)(2)

4. Are tank(s) used for waste stabilization utilizing a Level 2 control? Yes No N/A

D. Surface Impoundments (40 CFR §265.1086)

skip this section if the facility does not use surface

impoundments for waste management

1. Which of the following emissions control devices does the facility employ for its surface impoundments that manage hazardous waste with a VOC concentration >500 ppmw (circle appropriate ones)

   a. floating membrane cover

   b. cover that is vented through a closed-vent system to a control device

   c. other

   d. none

   If (c) other, describe:

   _____

   _____

2. Does it appear as though the device(s) being used is designed and operated properly (i.e., no emissions were likely to occur)? yes no N/A

   If no, describe:

   _____

   _____

   _____

E. Containers (40 CFR §265.1087)

skip this section if the facility does not use containers for waste management

1. Which of the following emissions control devices does the facility employ for its containers that manage hazardous waste

with a VOC concentration >500 ppmw (circle appropriate ones)

a. container meets DOT regulations - i.e., the container is closed and there are no visible holes, gaps, cracks or other openings in the container (Level 1 (265.1087(c)) or Level 2 (265.1087(d)) standard)

b. cover and closure devices that form a continuous barrier over the container openings (Level 1 standard)

c. organic-vapor suppressing barrier placed on or over the hazardous waste (Level 1 standard)

d. container that operates with no detectable organic emissions as defined in §265.1081 (Level 2 standard)

e. container demonstrated within the past 12 months to be vapor-tight (Level 2 standard)

f. container that is vented directly through a closed-vent system to a control device (Level 3 (265.1087(e)) standard)

g. container that is vented inside an enclosure which is exhausted through a closed-vent system to a control device (Level 3 standard)

h. other

i. none

If (h) other, describe:

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_____

2. Does it appear as though the device(s) being used is designed and operated properly (i.e., no emissions were likely to occur)? yes no N/A

If no, describe:

_____

_____

_____

265.1087(b)(1)(i) & (ii)

3. Are containers between 26 & 122 gallons not used for a waste stabilization process and containers greater than 122 gallons not in light material service provided with Level 1 control?
Yes No N/A

In light material service means the container is used to manage a material for which both of the following conditions apply: the vapor pressure of one or more of the organic constituents in the material is greater than 0.3 kilopascals (kPa) at 20 C and the total concentration of the pure organic constituents having a vapor pressure greater than 0.3 kPa at 20 C is equal to or greater than 20 percent by weight.

265.1087(b)(1)(iii)

4. Are containers greater than 122 gallons in light material service provided with Level 2 control? Yes No N/A

265.1087(b)(2)

5. Are containers greater than 26 gallons used for a waste stabilization process provided with a Level 3 control?
Yes No N/A

F. Inspections & Monitoring

complete this section if the facility is using air emission controls

265.1089(b)

1. Has the facility developed and implemented a written plan and schedule to perform all required inspection and monitoring activities of its air emissions control equipment?
yes no

265.1085(k)(1) & 265.1086(f)(1)

2. In the event of a defect involving a tank or surface impoundment, did the facility make first repairs no later than

5 calender days after detection and complete repairs no later than 45 calender days after detection?
yes no N/A

265.1087(c)(4)(iii), 265.1087(d)(4)(iii)

3. In the event of a defect involving a container using Container Level 1 or Level 2 controls, did the facility make first repairs no later than 24 hours after detection and complete repairs no later than 5 calender days after detection?
yes no N/A

G. Recordkeeping

265.1084(a)(3)(ii)(C)

1. Does the facility have a written sampling and analysis plan which describes the procedures by which representative samples will be collected and handled and is a copy maintained on-site? yes no

265.1090(b)(1)(ii) & (c)(3)

2. Does the facility maintain copies of inspection records, including dates of inspections and a description of defects and corrective actions taken to repair defects or problems involving its air emissions control equipment, for its tanks and surface impoundments? Yes No N/A

265.1087(c)(5)

3. Does the facility maintain a copy of the procedure used to determine that containers 122 gal which do not meet applicable DOT regulations are not managing hazardous waste in light material service? Yes No N/A

265.1090(a)

4. Are the above records maintained in the operating record for a minimum of three years? yes no N/A

Comments:

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