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HOTLINE QUESTIONS AND ANSWERS

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1. Frequently Asked Questions on the 40 CFR Part 264/265, Subpart CC Air Emission Standards

Are large quantity generators subject to the RCRA Subpart CC air emission standards for tanks, surface impoundments, and containers?

Yes, large quantity generators are subject to the Subpart CC air emission standards if managing hazardous waste in 90-day accumulation units (262.34(a)).

Does Subpart CC affect containers used for satellite accumulation under 262.34(c)?

Subpart CC does not apply to containers used for satellite accumulation (59 FR 62896, 62910; December 6, 1994).

Are large quantity generators subject to the Subpart AA and BB air emission standards for process vents and equipment leaks?

Yes, in addition to establishing the Subpart CC air emission standards, the December 6, 1994, Federal Register also extended the applicability of Subparts AA and BB to large quantity generators accumulating hazardous waste in permit-exempt units (262.34(a)).

Do the Subpart CC regulations specify the types of control equipment that must be installed to comply with the air emission standards?

The Subpart CC standards do not require the use of any specific type of equipment or add-on control device. Instead, the standards allow owners/operators the flexibility of choosing a control device that is best suited for a particular wastestream (59 FR 62896, 62918; December 6, 1994).