

RCRA, SUPERFUND & EPCRA CALL CENTER MONTHLY REPORT
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2. Subpart CC Waste Determination Options

The air emission standards in 40 CFR Parts 264/265, Subpart CC, apply to all tanks, surface impoundments, and containers used to manage hazardous waste at treatment, storage and disposal facilities and large quantity generator sites. However, only units that manage hazardous waste with an average volatile organic (VO) concentration of greater than or equal to 500 parts per million by weight (ppmw) require air emission controls (Sections 264.1082(c)(1) and 265.1083(c)(1)). How must an owner or operator determine the average VO concentration of their waste?

An owner or operator may use either direct measurement or knowledge of the waste to determine the average VO concentration at the point of waste origination. Direct measurement requires analysis in accordance with the requirements of Method 25D of Part 60, Appendix A, or one of the other methods specified in Section 265.1084(a)(3). Results obtained by using any method other than Method 25D must be adjusted to equate to a Method 25D equivalent concentration. This is accomplished by multiplying the total concentration measured by the appropriate fm factors for the constituents in the waste (61 FR 59932, 59942; November 25, 1996).

According to Section 265.1084(a)(4), owners or operators may also use their knowledge of the waste to determine the average VO concentration of the waste. They may use information that they have prepared or information supplied by the generator. Examples of such information include adjusted results obtained from another test method, organic material balances for the source or process generating the waste, documentation that the waste is generated by a process for which no organic-containing materials are used, or other knowledge based on manifests, shipping papers, or waste certification notices (Sections 265.1084(a)(4)(i)-(iii)).

Any applied knowledge or chosen test method does not need to account for any organic compounds present in the waste that have a Henry's Law constant of less than 0.1Y/X at 25°C (61 FR 59932, 59942; November 25, 1996). Appendix VI to Part 265 contains a list of compounds that meet this requirement.