

Texas Commission on Environmental Quality

CHECKLIST WORKSHEET

IHW CEI SUBPART AA

Regulating Entity Name

Date :

Additional I D:

Investigator Name:

Item Number	Description	PROCESS VENTS APPLICATIONS - PART 264/265 SUBPART AA	
	Answer	Citations	Notes
Item Number	Description	SECTION A: Applicability	
	Answer	Citations	Notes
Item Number	Description	A NO answer to questions 1-3 means that the AA requirements do not apply to the process vents at the facility. (Note: General exemptions found in 40 CFR 264/5.1 apply)	
	Answer	Citations	Notes
Item Number 1	Description	Does the TSDF facility have affected units permitted under Part 270; or is it permitted under Part 270 with permit-exempt recycling units; or is it a less than 90-day accumulation unit exempt from permitting, which is not a recycling unit under 40 CFR 261.6?	
	Answer	Citations	Notes
Item Number 2	Description	Does the TSDF manage hazardous waste in at least one of the following methods: distillation, fractionation, thin-film evaporation, solvent extraction, or air/steam stripping units?	
	Answer	Citations	Notes
Item Number 3	Description	Is the hazardous waste managed in the unit from question two at least 10 ppmw organic concentration?	
	Answer	Citations	Notes
Item Number	Description	SECTION B: Waste Streams	
	Answer	Citations	Notes
Item Number 1	Description	If the O/O claims waste streams are below 10 ppmw, was a proper concentration determination completed?	
	Answer	Citations	Notes
Item Number 1A	Description	If the determination is based on analysis was a minimum of four (4) grab samples, representative of the waste, collected and used in the determination?	
	Answer	Citations	Notes
Item Number 1B	Description	If the determination is based on knowledge is supporting documentation maintained?	
	Answer	Citations	Notes
Item Number 2	Description	Was date of initial determination before their effective date?	
	Answer	Citations	Notes
Item Number 3	Description	Was the determination updated annually, upon change to waste stream, or change to the process that generates or treats the waste?	
	Answer	Citations	Notes
Item Number	Description	SECTION C: Standards Facility Emissions Rates	
	Answer	Citations	Notes
Item Number 1	Description	Has the owner/operator reduced the total organic emissions from all affected process vents below 3 lb/hr and 3.1 t/yr, or reduced by use of a control device total organic emissions from all affected process vents by 95 weight % (Note: If control device was installed it must meet the requirements of §264/5.1033)?	
	Answer	Citations	Notes

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Item Number 1A	Description If performance tests were made in order to document vent emission and emission reduction, were they made according to 264/5.1034(c)?	Answer	Citations 265.1032(c)	Notes
Item Number 1B	Description If engineering calculations were used to document vent emission and emission reduction, were they made according to 264/5.1035 (b)2(ii)?	Answer	Citations 265.1032(c)	Notes
Item Number	Description SECTION D: Record Keeping	Answer	Citations	Notes
Item Number 1	Description Are records of all affected process vents, annual throughput, operating hours of each affected unit, estimated emission rates for each affected vent and for the overall facility and approximate location of each affected unit maintained?	Answer	Citations 265.1035(b)(2)	Notes
Item Number 2	Description Is information and data supporting determinations of vent emissions and emission reductions achieved based on engineering calculations or source tests with the unit operating under capacity load maintained?	Answer	Citations 265.1035(b)(2)	Notes
Item Number 3	Description If performance test was used to demonstrate the efficiency of the control device is a performance test plan maintained along with all test results? If Yes, does the plan include:	Answer	Citations	Notes
Item Number 3A	Description A description of the determination under highest load, estimated or design flow rate and organic content of each vent stream, acceptable operating ranges of key process and control device parameters?	Answer	Citations 265.1035(b)(3)	Notes
Item Number 3B	Description Does the test plan include a detailed engineering description of the closed vent system and control device including: manufacturer's name & model; type of control device; dimensions of control device; capacity; construction materials?	Answer	Citations 265.1035(b)(3)	Notes
Item Number 3C	Description A detailed description of sampling and monitoring procedures including: sampling locations and frequency; monitoring locations and frequency; equipment to be used; and analytical procedures for sample analysis?	Answer	Citations 265.1035(b)(3)	Notes
Item Number 4	Description Was a design analysis used for the closed vent system?	Answer	Citations	Notes
Item Number 4A	Description Is a list of all information references and sources used documented?	Answer	Citations 264.1035(b)(4)	Notes
Item Number 4B	Description Are records of compliance testing including dates maintained? (no detectable emissions or negative pressure)	Answer	Citations 264.1035(b)(4)	Notes
Item Number 4C	Description If engineering calculations are used in the design analysis of a control device are the specifications, drawings, schematics, piping, and instrumentation diagrams along with design documentation provided by the manufacturer or vendor maintained?	Answer	Citations 264.1035(b)(4)	Notes
Item Number 4D	Description For a thermal vapor incinerator did the design analysis completed to demonstrate performance consider the vent stream composition, constituent concentrations, and flow rate?	Answer	Citations 264.1035(b)(4)	Notes
Item Number 4E	Description Did the design analysis for the thermal vapor incinerator establish the design minimum and average temperature in the combustion zone and residence time?	Answer	Citations	Notes

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		Answer	Citations	264.1035(b)(4)	Notes
Item Number 4F	Description	For a catalytic vapor incinerator did the design analysis, completed to demonstrate performance consider the vent stream composition, constituent concentrations, and flow rate?			
		Answer	Citations	264.1035(b)(4)	Notes
Item Number 4G	Description	Did the design analysis for the catalytic vapor incinerator establish the design minimum and average temperatures across the catalyst bed inlet and outlet?			
		Answer	Citations	264.1035(b)(4)	Notes
Item Number 4H	Description	For a boiler or process heater did the design analysis, completed to demonstrate performance, consider the vent stream composition, constituent concentrations, and flow rate?			
		Answer	Citations	264.1035(b)(4)	Notes
Item Number 4I	Description	For a boiler or process heater did the design analysis establish the design minimum and average flame zone temperatures, combustion zone residence time, and description of method and location where the vent stream is introduced into the combustion zone?			
		Answer	Citations	264.1035(b)(4)	Notes
Item Number 4J	Description	For a flare did the design analysis completed to demonstrate performance consider the vent stream composition, constituent concentrations, and flow rate?			
		Answer	Citations	264.1035(b)(4)	Notes
Item Number 4K	Description	For a condenser did the design analysis completed to demonstrate performance consider the vent stream composition, constituent concentrations, flow rate, relative humidity, and temperature?			
		Answer	Citations	264.1035(b)(4)	Notes
Item Number 4L	Description	Did the design analysis, for the condenser, establish the design outlet organic compound concentration level, design average temperature of the exhaust vent stream, and design average temperatures of the coolant fluid at the condenser inlet and outlet?			
		Answer	Citations	264.1035(b)(4)	Notes
Item Number 4M	Description	For a regenerating type carbon adsorption system did the design analysis completed to demonstrate performance consider vent stream composition, constituent concentration, flow rate, relative humidity, and temperature?			
		Answer	Citations	264.1035(b)(4)	Notes
Item Number 4N	Description	Did the design analysis for the regenerating type carbon adsorption system establish the design exhaust vent stream organic compound concentration level, the number and capacity of beds, the type and working capacity of the activated carbon, the design total steam flow over the period of each complete regeneration cycle, the duration of the steaming and cooling/drying cycles, the design temperature after regeneration, the design regeneration time, and the carbon service life.			
		Answer	Citations	264.1035(b)(4)	Notes
Item Number 4O	Description	For the non-regenerating type carbon adsorption system did the design analysis completed to demonstrate performance consider the vent stream composition, constituent concentrations, flow rate, relative humidity, and temperature?			
		Answer	Citations	265.1035(b)(4)	Notes
Item Number 4P	Description	Did the design analysis for the non-regenerating type carbon adsorption system establish the design outlet organic concentration level, capacity of carbon bed, type and working capacity of activated carbon used, the design carbon replacement interval based on the total carbon working capacity of the control device, and source operating schedule?			
		Answer	Citations	265.1035(b)(4)	Notes

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Item Number 4Q	Description Did the O/O certify in writing that the operating parameters used in the design analysis reasonably represent the conditions when the unit would be operating at the highest load or capacity?
	Answer Citations 264.1035(b)(4) Notes
Item Number 4R	Description A certification by the O/O that the control device is designed to operate at 95% efficiency unless the total organic concentration limit or total organic emission limit of §264/265.1032(a) is achieved at an efficiency <95 weight percent or a certification by the control device manufacture or vendor that the device meets the design specifications? (Note: The control device used to obtain emission limits must involve vapor recovery)
	Answer Citations 264.1035(b)(4) Notes
Item Number 5	Description Is design documentation and monitoring , operating, and inspection information for each closed vent system and control device recorded and kept up to date in the facility operating record?
	Answer Citations 264.1035(c) Notes
Item Number 5A	Description For a thermal vapor incinerator designed to operate with a minimum residence time of 0.05 second at a minimum temperature of 760 C is the period when the combustion temperature below 760 C recorded?
	Answer Citations 265.1035(c)(4) Notes
Item Number 5B	Description For a catalytic vapor incinerator is the periods when temperature of the vent stream at the catalyst bed inlet is more than 28 degrees C below the average temperature of the inlet vent stream?
	Answer Citations 265.1035(c)(4) Notes
Item Number 5C	Description For a catalytic vapor incinerator when the occurrence of the temperature difference across the catalyst bed is less than 80% of the design average recorded?
	Answer Citations 265.1035(c)(4) Notes
Item Number 5D	Description For a boiler or process heater are periods when the flame zone temperature is more than 28 degrees C below the design average recorded?
	Answer Citations 265.1035(c)(4) Notes
Item Number 5E	Description Are periods recorded when the position changes where the vent stream is introduced to the combustion zone in a boiler or process heater?
	Answer Citations 265.1035(c)(4) Notes
Item Number 5F	Description Is the occurrence when the pilot flame is not ignited for a flare recorded?
	Answer Citations 265.1035(b)(4) Notes
Item Number 5G	Description For the condenser that is equipped with a continuous recorder to measure the concentration level, are periods recorded when the organic compound concentration readings in the exhaust vent stream are more than 20% greater than the design outlet concentration?
	Answer Citations 265.1035(c)(4) Notes
Item Number 5H	Description For the condenser that is equipped with a continuous recorder to monitor temperature are periods recorded when the temperature of the exhaust vent stream from the condenser is more than 6 degrees C above the design average or when the temperature of the coolant fluid exiting the condenser is more than 6 degrees C above the design average?
	Answer Citations 265.1035(c)(4) Notes
Item Number 5I	Description For a regeneration carbon adsorption system equipped with a monitoring device to measure the concentration level of the organic compounds in the exhaust vent stream from the carbon bed are periods when the organic concentration in the exhaust stream are more than 20% greater than the design concentration level?

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	Answer	Citations	Notes
Item Number 5J	Description	For a regeneration carbon adsorption system equipped with a monitoring device to measure a parameter that indicates the carbon is regenerated on a regular predetermined time cycle, are periods recorded when the vent stream continues to flow through the control device beyond the predetermined regeneration time?	
	Answer	Citations	Notes
Item Number 5K	Description	Is an explanation recorded for each period for when the control device operating parameter exceeded the design value and the measures implemented to correct the control device operation?	
	Answer	Citations	Notes
Item Number 5L	Description	For carbon adsorption systems that regenerate directly to the control device and systems that do not regenerate but replace the carbon at regular predetermined time, is the date when the carbon is replaced with fresh carbon recorded?	
	Answer	Citations	Notes
Item Number 5M	Description	For carbon adsorption systems that do not regenerate but replace the carbon immediately upon breakthrough, is the date and time when the control device is monitored for breakthrough along with the monitoring device reading and the date when the carbon was replaced, recorded?	
	Answer	Citations	Notes
Item Number 5N	Description	Is the date of each control device startup and shutdown recorded?	
	Answer	Citations	Notes
Item Number 5O	Description	Has the O/O recorded the identification, an explanation of why it is unsafe to monitor and a monitoring plan for each component that has been designated as unsafe to monitor in the operating record?	
	Answer	Citations	Notes
Item Number 5P	Description	When a leak is detected does the O/O record the identification number of the instrument and component; the operators name, initials or identification number; the date the leak was detected; the date of first attempt to repair; the date of successful repair; the maximum instrument reading after repair; the reason if repair has been delayed?	
	Answer	Citations	Notes
Item Number 5Q	Description	If the repair was delayed because there was a depletion of stocked parts is there documentation that spare parts were sufficiently stocked on-site before depletion and the reason for depletion?	
	Answer	Citations	Notes
Item Number 6	Description	Are records of monitoring, operating and inspection information maintained for at least three (3) years following the date of each occurrence?	
	Answer	Citations	Notes
Item Number 7	Description	For a control device other than a thermal vapor incinerator, catalytic vapor incinerator, flare, boiler, process heater, condenser, or carbon adsorption system has the O/O kept records as directed by the ED or RA?	
	Answer	Citations	Notes
Item Number	Description	SECTION E: Reporting (for Permitted facilities only)	
	Answer	Citations	Notes
Item Number 1	Description	For facilities with final permits incorporating this rule, have they submitted a semi-annual reports of exceedances lasting longer than 24 hours (Note; due date specified by RA or ED and if during reporting period no exceedances occurred then no report is required [264.1036(b)])?	

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	Answer	Citations	264.1036	Notes
Item Number 1A	Description	Did the report include: EPA Id number; name and address of the facility; dates when the control device exceeded the design specifications when not corrected within 24 hours or that a flare operated with visible emissions; the duration and cause of each exceedance and corrective action taken?		
	Answer	Citations	264.1036(a)(2)	Notes