

## Texas Commission on Environmental Quality

### CHECKLIST WORKSHEET

IHW CEI SUBPART BB

**Regulating Entity Name**

**Date :**

**Additional I D:**

**Investigator Name:**

<b>Item Number</b>	<b>Description</b>	SUBPART BB: Air Emission Standards for Equipment Leaks	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 1</b>	<b>Description</b>	Is the facility exempt from the Subpart BB regulations,? if yes explain.	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 2</b>	<b>Description</b>	Does the facility have any valves, pumps, compressors, pressure relief devices, sampling connection systems, flanged pipe open-ended valve or line that contain or contact hazardous wastes greater than 10 percent organics?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 3</b>	<b>Description</b>	Is the equipment in contact with the hazardous waste at least 300 hours per calendar year?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 4</b>	<b>Description</b>	Has this equipment been marked as required by the Subpart BB Regulations?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	RECORDKEEPING	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 1</b>	<b>Description</b>	Has the identification number and type of each piece of equipment been included in the record along with the associated waste management unit?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 2</b>	<b>Description</b>	As stated in the Waste Analysis Plan, has the percent by weight total organics in each hazardous waste stream been documented as well as the physical state of the waste?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 3</b>	<b>Description</b>	Is the method of compliance with the standard (ie. "monthly leak detection and repair" or "equipped with dual mechanical seals") recorded for each piece of equipment?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	MONITORING	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 1</b>	<b>Description</b>	Were pumps in light liquid service and valves in gas/vapor or light liquid service monitored monthly by Method 21?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 2</b>	<b>Description</b>	Were pumps in light liquid service visually inspected weekly?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 3</b>	<b>Description</b>	Was leak detection performed in accordance with the standards in Method 21 (40 CFR Part 60)?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 4</b>	<b>Description</b>	If any valve was designated "unsafe-to-monitor," did the O/O prepare and adhere to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 5</b>	<b>Description</b>	If any valve was designated "difficult-to-monitor," did the O/O follow a written plan that requires monitoring of the valve at least once per calendar year?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>

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**CHECKLIST WORKSHEET**

IHW CEI SUBPART BB (Cont)

<b>Item Number</b> 6	<b>Description</b> If the O/O elected to comply with an alternative standard, did the O/O provide notification and conduct a performance test prior to implementing the alternative practice?	<b>Answer</b>	<b>Citations</b> 264.1061(c)	<b>Notes</b>
<b>Item Number</b>	<b>Description</b> LEAK DETECTION AND REPAIRS	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> 1	<b>Description</b> For permitted facilities, has the owner/operator submitted semiannual reports as required?	<b>Answer</b>	<b>Citations</b> 264.1065(a)(2)	<b>Notes</b>
<b>Item Number</b> 2	<b>Description</b> For each leak detected, was the equipment tagged?	<b>Answer</b>	<b>Citations</b> 264.1064(c)(1)	<b>Notes</b>
<b>Item Number</b> 3	<b>Description</b> For detected leaks, does the inspection log contain the identification numbers, date found, dates of attempts to repair and date of repair?	<b>Answer</b>	<b>Citations</b> 264.1064(d)(1)	<b>Notes</b>
<b>Item Number</b> 4	<b>Description</b> Was the initial attempt to repair the leak within 5 days and the repair completed in 15 days?	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> 5	<b>Description</b> If a delay in a repair occurred, did the equipment meet one of the conditions to allow the delay?	<b>Answer</b>	<b>Citations</b> 264.1059(c)(1)	<b>Notes</b>
<b>Item Number</b> A	<b>Description</b> Was the repair technically infeasible without a unit shutdown?	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> B	<b>Description</b> Was the equipment isolated from the HWMU and cease to contain hazardous waste?	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> C	<b>Description</b> For valves, did the owner/operator determine that the emissions from the immediate repair would be greater than the emissions resulting from the delay?	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> D	<b>Description</b> For pumps, did the repair require the use of a dual mechanical seal system that included a barrier fluid system?	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> E	<b>Description</b> Was the repair completed as soon as possible, but not later than 6 months after the leak was detected?	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b>	<b>Description</b> PUMPS, COMPRESSORS WITH DUAL MECHANICAL SEAL SYSTEMS	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> 1	<b>Description</b> Does each pump or compressor equipped with a dual mechanical seal system that includes a barrier fluid system meet the following requirements?	<b>Answer</b>	<b>Citations</b> 335.112(a)(20)	<b>Notes</b>
<b>Item Number</b> A	<b>Description</b> Are the seal systems operated with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure?	<b>Answer</b>	<b>Citations</b> 265.1052(d)(1)	<b>Notes</b>
<b>Item Number</b> I	<b>Description</b> Are they equipped with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device compliant with 264/5.1060, OR	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> II	<b>Description</b> Equipped with a system that purges the barrier fluid into a hazardous waste stream with no detectable emissions to the atmosphere?	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> B	<b>Description</b> Is the barrier fluid a hazardous waste with organic concentrations that exceed 10 percent by weight?	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>

**Texas Commission on Environmental Quality**

**CHECKLIST WORKSHEET**

IHW CEI SUBPART BB (Cont)

	<b>Answer</b>	<b>Citations</b>	262.34(a)(1)	<b>Notes</b>
<b>Item Number C</b>	<b>Description</b>	Is each barrier fluid system equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both?		
	<b>Answer</b>	<b>Citations</b>	335.69(a)(1)	<b>Notes</b>
<b>Item Number D</b>	<b>Description</b>	Is each pump visually inspected weekly for leaks from the pump seals?		
	<b>Answer</b>	<b>Citations</b>	264.1052(d)(4)	<b>Notes</b>
<b>Item Number E</b>	<b>Description</b>	Is each sensor checked daily or, for audible alarms, monthly?		
	<b>Answer</b>	<b>Citations</b>	264.1052(d)(5)	<b>Notes</b>
<b>Item Number F</b>	<b>Description</b>	Has the O/O determined a criterion based on design and operating experience that indicates the failure of the system?		
	<b>Answer</b>	<b>Citations</b>	265.1052(d)(5)	<b>Notes</b>
<b>Item Number G</b>	<b>Description</b>	Was the initial attempt to repair any leaks made within 5 days of detection and the repair completed within 15 days?		
	<b>Answer</b>	<b>Citations</b>	335.152(a)(18)	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	PUMPS, COMPRESSORS, AND VALVES DESIGNATED AS NO DETECTABLE EMISSIONS		
	<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number 1</b>	<b>Description</b>	For any pumps or compressors designated "no detectable emissions" the following requirements must be met to be exempt:		
	<b>Answer</b>	<b>Citations</b>	265.1053(i)	<b>Notes</b>
<b>Item Number A</b>	<b>Description</b>	Do they have an externally actuated shaft penetration on the pump housing?		
	<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number B</b>	<b>Description</b>	Have they operated with no detectable emissions (< 500 ppm above background)?		
	<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number C</b>	<b>Description</b>	Are they tested for compliance initially upon design and then annually thereafter?		
	<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number 2</b>	<b>Description</b>	Is the designation indicated in the record for each piece of equipment and signed by the owner/operator?		
	<b>Answer</b>	<b>Citations</b>	335.152(a)(18)	<b>Notes</b>
<b>Item Number 3</b>	<b>Description</b>	Did the record include the dates of each compliance test, the background level, and the maximum instrument reading measured?		
	<b>Answer</b>	<b>Citations</b>	262.34(a)(1)	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	OTHER EQUIPMENT		
	<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number 1</b>	<b>Description</b>	Are all compressors equipped with a dual mechanical seal system that includes a barrier fluid system?		
	<b>Answer</b>	<b>Citations</b>	265.1053	<b>Notes</b>
<b>Item Number 2</b>	<b>Description</b>	Is each sampling connection equipped with a closed system which either returns, recycles or transports the purged process fluids to the process or a waste management unit?		
	<b>Answer</b>	<b>Citations</b>	335.152(a)(18)	<b>Notes</b>
<b>Item Number 3</b>	<b>Description</b>	For pressure relief devices:		
	<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number A</b>	<b>Description</b>	Do they operate at "no detectable emissions"?		
	<b>Answer</b>	<b>Citations</b>	335.112(a)(20)	<b>Notes</b>
<b>Item Number B</b>	<b>Description</b>	After a release event, did the device return to "no detectable emissions" status within 5 days and monitored to confirm the designation?		
	<b>Answer</b>	<b>Citations</b>	265.1054(b)(2)	<b>Notes</b>

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IHW CEI SUBPART BB (Cont)

<b>Item Number</b> 4	<b>Description</b> Are all open-ended valves and lines equipped with a cap, blind flange, plug, or secondary valve and remain sealed?	<b>Answer</b>	<b>Citations</b> 265.1056(b)	<b>Notes</b>
<b>Item Number</b>	<b>Description</b> OTHER VIOLATIONS	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> 1	<b>Description</b> List additional violations here	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> 2	<b>Description</b> List additional violations here	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> 3	<b>Description</b> List additional violations here	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> 4	<b>Description</b> List additional violations here	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> 5	<b>Description</b> List additional violations here	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>