

## Texas Commission on Environmental Quality

### CHECKLIST WORKSHEET

IHW CEI SUBPART CC

**Regulating Entity Name**

**Date :**

**Additional I D:**

**Investigator Name:**

<b>Item Number</b>	<b>Description</b>	SUBPART CC - Air Emission Standards for Tanks, Surface Impoundments, and Containers for TSD's and LQG's	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number 1</b>	<b>Description</b>	Is the facility exempt from this subchapter under 265.1080(b)/264.1080(b), 265.1083(c)/264.1082(c), or 265.1/264.1? If yes, explain.	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number 2</b>	<b>Description</b>	Did the documentation (in the operating record) for the exemption include the information used to determine the exemption such as test results, measurements, calculations, and sampling events which include the locations, dates, and times sample collections?	
		<b>Answer</b>	<b>Citations</b> 335.112(a)(21) <b>Notes</b>
<b>Item Number</b>	<b>Description</b>	WASTE DETERMINATION PROCEDURES	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number 1</b>	<b>Description</b>	Has a Volatile Organic (VO) concentration waste determination of each hazardous waste (treated or untreated) been conducted and documented?	
		<b>Answer</b>	<b>Citations</b> 335.112(a)(21) <b>Notes</b>
<b>Item Number 2</b>	<b>Description</b>	Was the determination made by direct measurement or process knowledge?	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number 3</b>	<b>Description</b>	If an analysis was performed, were the following requirements met:	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number A</b>	<b>Description</b>	Did the facility develop a site sampling plan?	
		<b>Answer</b>	<b>Citations</b> 265.1084(a)(3) <b>Notes</b>
<b>Item Number B</b>	<b>Description</b>	Were at least four samples collected and analyzed within a year?	
		<b>Answer</b>	<b>Citations</b> 264.1083(a)(2) <b>Notes</b>
<b>Item Number C</b>	<b>Description</b>	Was the analysis performed by an approved method?	
		<b>Answer</b>	<b>Citations</b> 335.69(a)(1) <b>Notes</b>
<b>Item Number D</b>	<b>Description</b>	Did the Owner/Operator (O/O) determine the maximum organic vapor pressure for each hazardous waste placed in a tank using Tank Level 1 controls?	
		<b>Answer</b>	<b>Citations</b> 264.1084(c)(1) <b>Notes</b>
<b>Item Number E</b>	<b>Description</b>	Were tests conducted by Method 21 to determine "no detectable organic emissions?"	
		<b>Answer</b>	<b>Citations</b> 264.1083(d) <b>Notes</b>
<b>Item Number</b>	<b>Description</b>	TANKS	
		<b>Answer</b>	<b>Citations</b>
<b>Item Number 1</b>	<b>Description</b>	Did the records contain the tank identification number, dates of inspections, and detailed descriptions of any defects detected including action dates?	
		<b>Answer</b>	<b>Citations</b> 262.34(a)(1) <b>Notes</b>
<b>Item Number 2</b>	<b>Description</b>	For hazardous waste with an average volatile organic concentration of > 500 ppmw, is the hazardous waste managed in tanks with Tank Level 1 controls or Tank Level 2 controls?	
		<b>Answer</b>	<b>Citations</b> 335.112(a)(21) <b>Notes</b>

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<b>Item Number</b> 3	<b>Description</b>	Does the hazardous waste in the tanks meet the following requirements for Level 1 controls: (if not, level 2 controls must be used).	
	<b>Answer</b>	<b>Citations</b>	265.1085(b)(1) <b>Notes</b>
<b>Item Number</b> A	<b>Description</b>	Does the hazardous waste have less than the maximum organic vapor pressure for the tank's design capacity? (Tank >=40,000 gal=5.2kPa, >=20,000 gal=27.6kPa, <20,000 gal=76.6kPa)	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> B	<b>Description</b>	Did the determination include records of the date and time the samples were collected, the analysis method used and the analysis results for each hazardous waste?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> C	<b>Description</b>	Is the HW in the tank heated by the O/O to a temperature > the temperature at which maximum organic vapor pressure of the HW is determined for the purpose of complying with above?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> D	<b>Description</b>	Is the HW in the tank treated by O/O using a waste stabilization process as defined 265.1081?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> 4	<b>Description</b>	For tanks with Level 1 controls, was the fixed roof designed to meet the following specifications:	
	<b>Answer</b>	<b>Citations</b>	264.1088(b) <b>Notes</b>
<b>Item Number</b> A	<b>Description</b>	Were any visible cracks, holes, gaps or spaces in the closure devices, section joints, or interfaces noted?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> B	<b>Description</b>	Were the roof and closure devices made of suitable material as to minimize the exposure of hazardous waste to the air?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> C	<b>Description</b>	Was the closure device secured in the closed position, (or if it is connected by a closed-vent system vented to a control device, was the device operating) except during inspection, cleanouts, sampling, or to avoid unsafe condition?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> D	<b>Description</b>	Were the roof and closure devices inspected annually?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> 5	<b>Description</b>	For tanks with Level 2 controls, were one of the tanks below used and were the specifications met:	
	<b>Answer</b>	<b>Citations</b>	262.34(a)(1) <b>Notes</b>
<b>Item Number</b> A	<b>Description</b>	Fixed-roof with an internal floating roof meeting these requirements:	
	<b>Answer</b>	<b>Citations</b>	264.1084(e)(3) <b>Notes</b>
<b>Item Number</b> I	<b>Description</b>	Was the internal floating roof equipped with a continuous seal between the wall and floating roof edge with a continuous seal and documentation of the design maintained?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> II	<b>Description</b>	Were the automatic bleeder vents closed at all times except when the roof was being floated off or was on the leg supports?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> III	<b>Description</b>	Were all openings closed prior to filling the tank, and were the rim space vents closed except when the internal roof was not floating or when the pressure exceeded the manufacturer's recommended setting?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> IV	<b>Description</b>	Was the internal floating roof inspected every 12 months and the seals, gaskets, and membranes every 10 years (or an alternative)?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>

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Item Number V	<b>Description</b> Was notification provided?		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number B	<b>Description</b> External floating roof in accordance with the following requirements:		
	<b>Answer</b>	<b>Citations</b> 264.1089(b)(2)	<b>Notes</b>
Item Number I	<b>Description</b> Is the floating roof equipped with two continuous seals, one above the other?		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number II	<b>Description</b> Are all openings, except automatic bleeder and rim space vents, secured in the closed position?		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number III	<b>Description</b> Are automatic bleeder vents, rim space vents, guide poles, gauge hatch and sample wells equipped with a gasket or gasket cover and remain closed except when the roof was being floated off, the pressure exceeded manufacturer's recommendations, or access was necessary?		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number IV	<b>Description</b> Were inspections to determine the seal gap performed every 5 years (or after being out of service for 1 year or more) as well as annual visual inspections of the floating roof?		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number V	<b>Description</b> Did the inspection records include dates, raw data measurements, calculations, and detailed descriptions of any repairs as well as a documented description of the floating roof design and dimensions of the tank?		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number VI	<b>Description</b> Was notification provided?		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number C	<b>Description</b> A tank that vents to a control device with the following requirements:		
	<b>Answer</b>	<b>Citations</b> 335.152(a)(19)	<b>Notes</b>
Item Number I	<b>Description</b> Is the tank covered by a fixed roof designed to form a continuous barrier over the surface of the liquid and vented directly through a closed-vent system?		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number II	<b>Description</b> Are all openings not vented to the control device equipped with a closure device which does not exhibit any visible cracks, holes, gaps, or other open spaces?		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number III	<b>Description</b> Are the roof and control devices made of suitable materials that minimize the exposure of hazardous waste to the atmosphere?		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number IV	<b>Description</b> Is the closed-vent system and control device operated and inspected in accordance with the requirements in 264.1087 / 265.1088 (ref. Subpart AA)?		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number V	<b>Description</b> Were all vapors vented to the control device except during inspections, cleanouts, samplings, or to avoid unsafe condition?		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number VI	<b>Description</b> Were inspections of the air emission control equipment performed annually?		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number D	<b>Description</b> Pressure tank meeting the following requirements:		
	<b>Answer</b>	<b>Citations</b> 262.34(a)(1)	<b>Notes</b>

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<b>Item Number I</b>	<b>Description</b>	Was the tank designed NOT to vent to the atmosphere as a result of compression of the vapor headspace in the tank during filling to its design capacity?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number II</b>	<b>Description</b>	Were all tank openings equipped with closure devices designed to operate with "no detectable organic emissions" as specified in 264.1083(d) / 265.1084(d)?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number III</b>	<b>Description</b>	Was the tank operated as a closed system that didn't vent to the atmosphere except when required to avoid an unsafe condition or when purging of inerts?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number E</b>	<b>Description</b>	An enclosure vented through a closed-vent system to an enclosed combustion control device meeting the following requirements:	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number I</b>	<b>Description</b>	Is the tank located inside an enclosure designed and operated in accordance with "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number II</b>	<b>Description</b>	Was the enclosure vented through a closed-vent system to an enclosed combustion control device operated and inspected as specified in 264.1087 / 265.1088?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number III</b>	<b>Description</b>	Did the records include the most recent calculations and measurements performed to verify that the enclosure meets the criteria as well as information required closed-vent systems and control devices?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 6</b>	<b>Description</b>	Was the transfer of the hazardous wastes conducted by using continuous hard-piping or other closed system? (Does not apply to wastes treated by organic destruction/removal or wastes meeting LDR standards)	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 7</b>	<b>Description</b>	If a defect was detected, was the initial attempt to repair it performed within 5 days and the repair completed within 45 days or later if removal from service required?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 8</b>	<b>Description</b>	For any covers designated as "unsafe to inspect and monitor" covers, did the O/O prepare a written explanation of the designation, the identification number of the management unit, and an inspection schedule?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 9</b>	<b>Description</b>	Other violations regarding tanks	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number A</b>	<b>Description</b>	Other violations regarding tanks	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number B</b>	<b>Description</b>	Other violations regarding tanks	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number C</b>	<b>Description</b>	Other violations regarding tanks	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	SURFACE IMPOUNDMENTS	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 1</b>	<b>Description</b>	Is the floating membrane cover fabricated from a synthetic membrane with no visible spaces that is vented through a closed-vent system to a control device documented, designed, operated, inspected, and recorded in accordance with the requirements of 264.1087 / 265.1088?	

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		<b>Answer</b>	<b>Citations</b>	<b>264.1088(b)</b>	<b>Notes</b>
<b>Item Number</b> 2	<b>Description</b>	Are the vapors vented to the control device and are the closure devices secured in the closed position except during inspections, sampling, cleanouts, and to avoid unsafe conditions?			
		<b>Answer</b>	<b>Citations</b>	335.152(a)(19)	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	CONTAINERS			
		<b>Answer</b>	<b>Citations</b>		<b>Notes</b>
<b>Item Number</b> 1	<b>Description</b>	Is the facility utilizing the appropriate Container Level (1, 2, or 3)?			
		<b>Answer</b>	<b>Citations</b>	335.152(a)(19)	<b>Notes</b>
<b>Item Number</b> 2	<b>Description</b>	For Container Level 1 Standards, is one of the following controls used?			
		<b>Answer</b>	<b>Citations</b>	262.34(a)(1)	<b>Notes</b>
<b>Item Number</b> A	<b>Description</b>	Does the container meet DOT standards and remain closed except when adding waste, inspecting the container, to avoid an unsafe condition, or when empty?			
		<b>Answer</b>	<b>Citations</b>	335.69(a)(1)	<b>Notes</b>
<b>Item Number</b> B	<b>Description</b>	A container equipped with a cover and closure devices made of suitable material that form a continuous barrier such that there are no visible holes, gaps, or other open spaces?			
		<b>Answer</b>	<b>Citations</b>	264.1086(c)(2)	<b>Notes</b>
<b>Item Number</b> C	<b>Description</b>	An open-top container using an organic-vapor suppressing barrier made of suitable material to prevent the exposure of hazardous waste to the atmosphere (ie. vapor suppressing foam)?			
		<b>Answer</b>	<b>Citations</b>	335.112(a)(21)	<b>Notes</b>
<b>Item Number</b> D	<b>Description</b>	Does the O/O have a procedure in place to determine that containers > 0.46m <sup>3</sup> (121 gal) NOT meeting DOT standards are not in light material service?			
		<b>Answer</b>	<b>Citations</b>	335.112(a)(21)	<b>Notes</b>
<b>Item Number</b> 3	<b>Description</b>	For Container Level 2 Standards, is one of the following controls used?			
		<b>Answer</b>	<b>Citations</b>	265.1086(d)(1)	<b>Notes</b>
<b>Item Number</b> A	<b>Description</b>	Does the container meet DOT standards and remain closed except when adding waste, inspecting the container, to avoid an unsafe condition, or when empty?			
		<b>Answer</b>	<b>Citations</b>	264.1086(d)(1)	<b>Notes</b>
<b>Item Number</b> B	<b>Description</b>	Does the container operate with "no detectable organic emissions" as defined in 265.1081 using the procedure in 265.1084(d) / 264.1083(d) [ref. Method 21]?			
		<b>Answer</b>	<b>Citations</b>	335.69(a)(1)	<b>Notes</b>
<b>Item Number</b> C	<b>Description</b>	Is the container a container that has been demonstrated to be vapor-tight using 40 CFR part 60, appendix A, Method 27 within the preceding 12 months?			
		<b>Answer</b>	<b>Citations</b>	265.1087(h)	<b>Notes</b>
<b>Item Number</b> 4	<b>Description</b>	For containers using Level 1 or 2 controls, were the following inspections performed and requirements met:			
		<b>Answer</b>	<b>Citations</b>	335.152(a)(19)	<b>Notes</b>
<b>Item Number</b> A	<b>Description</b>	Did the containers remain secured in the closed position except when adding or removing hazardous waste, performing routine maintenance, sampling or when empty?			
		<b>Answer</b>	<b>Citations</b>	335.152(a)(19)	<b>Notes</b>
<b>Item Number</b> B	<b>Description</b>	Were inspections performed and recorded at the time the container was accepted (if not emptied within 24 hours) and at least every 12 months thereafter to check for visible cracks, gaps, holes or other open spaces?			
		<b>Answer</b>	<b>Citations</b>	335.112(a)(21)	<b>Notes</b>

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<b>Item Number</b> C	<b>Description</b> Was the initial attempt to repair a detected leak within 24 hours, completed within 5 days, or removed from service?	<b>Answer</b>	<b>Citations</b> 262.34(a)(1)	<b>Notes</b>
<b>Item Number</b> 5	<b>Description</b> For Container Level 3 Standards, was one of the following controls used?	<b>Answer</b>	<b>Citations</b> 335.152(a)(19)	<b>Notes</b>
<b>Item Number</b> A	<b>Description</b> A container directly vented through a closed-vent system to a control device designed and operated in accordance with the requirements of 265.1088 / 264.1087?	<b>Answer</b>	<b>Citations</b> 265.1087(e)(1)	<b>Notes</b>
<b>Item Number</b> B	<b>Description</b> A container that is vented inside an enclosure which is exhausted through a closed-vent system to a control device designed and operated in accordance with the requirements of 265.1088 / 264.1087 and with the criteria as specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure"?	<b>Answer</b>	<b>Citations</b> 335.152(a)(19)	<b>Notes</b>
<b>Item Number</b> C	<b>Description</b> Were inspections and monitoring conducted of the closed-vent systems and control devices in accordance with 265.1088 / 264.1087?	<b>Answer</b>	<b>Citations</b> 335.112(a)(21)	<b>Notes</b>
<b>Item Number</b> D	<b>Description</b> Did records include the most recent set of calculations and measurements to verify that the enclosure meets the criteria as specified in "Procedure T" under 40 CFR 52.741, appendix B as well as all records required in 265.1088 / 264.1087?	<b>Answer</b>	<b>Citations</b> 335.112(a)(21)	<b>Notes</b>
<b>Item Number</b> 6	<b>Description</b> For containers using Level 2 or 3 controls, was the transfer of hazardous waste conducted in such a manner as to minimize the exposure of hazardous waste to the atmosphere?	<b>Answer</b>	<b>Citations</b> 335.112(a)(21)	<b>Notes</b>
<b>Item Number</b> 7	<b>Description</b> Other violations regarding containers	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> A	<b>Description</b> Other violations regarding containers	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> B	<b>Description</b> Other violations regarding containers	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b> C	<b>Description</b> Other violations regarding containers	<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</b> 1	<b>Description</b> Are inspection records kept for a minimum of three years?	<b>Answer</b>	<b>Citations</b> 265.1090(a)	<b>Notes</b>
<b>Item Number</b> 2	<b>Description</b> Is the design documentation kept for the life of the equipment?	<b>Answer</b>	<b>Citations</b> 264.1089(a)	<b>Notes</b>
<b>Item Number</b> 3	<b>Description</b> For each hazardous waste management unit (WMU) not using air emission controls specified in this subpart, did the O/O provide a certification that the WMU is equipped with operating controls in accordance with the Clean Air Act under 40 CFR part 60, 61, or 63 and identify the specific requirements with which the WMU is in compliance?	<b>Answer</b>	<b>Citations</b> 335.112(a)(21)	<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> OTHER VIOLATIONS	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>

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Item Number 2

<b>Description</b>	OTHER VIOLATIONS		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>

Item Number 3

<b>Description</b>	OTHER VIOLATIONS		
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>