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O. SUBPART CC – AIR EMISSION STANDARDS

O.1 Standards for All Facilities

The requirements of Subpart CC, as listed in the Code of Federal Regulations (CFR), 40 CFR 264.1080 – 1090, apply to all facilities that treat, store, or dispose of hazardous waste in tanks, surface impoundments, or containers subject to subparts I, J, or K of Part 264. Proposed operations at the facility include management and treatment of hazardous waste in containers, defined in 40 CFR 260.10 as any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled. As such, the facility is subject to the provisions of Subpart CC.

O.2 Exemptions

The facility will store and process waste only in containers. As demonstrated in the proposed process layout figure provided in **Appendix D.1.1** and process flow diagram provided in **Appendix D.1.5**, these containers will be located in one of four areas:

- Waste Storage Area
- Shipping and receiving (temporarily)
- Preparation Area (temporarily)
- Waste Material Transfer Room

Hazardous waste received by CS Clean Solutions, Inc. (CS Clean) will be stored in Cleansorb columns. These columns range in size from 25 to 300 liters (L; 0.025 cubic meters (m³) to 0.3 m³). In accordance with 40 CFR 264.1080(b)(2), containers with design capacity less than 0.1 m³ are exempt from the requirements of Subpart CC. Additionally, the facility will transfer spent granulate into the shipping containers which are 55 gallons (0.21 m³) each. Therefore, the shipping containers, and Cleansorb columns received by CS Clean that are 100 L (0.1 m³) or less in size are exempt from the requirements of Subpart CC.

Cleansorb columns received by the facility that are greater than 100 L (0.1 m³) are subject to Subpart CC.

However, the waste received by CS Clean will not contain volatile organic compounds. As such, the average volatile organic concentration at the point of waste origination is less than 500 parts per million by weight. Therefore, in accordance with 40 CFR 264.1082(c)(1), the facility is exempt from the standards specified in 264.1084 through 264.1087 for tanks, and closed vent systems and control devices.

It should be noted that the proposed operations at the facility include treatment of spent granulate using a copper sulfate solution. This Copper Sulfate solution is stored in a mixing tank, where it is mixed with water and pumped to a container, where it is then mixed with the spent granulate waste as part of a treatment process as highlighted in SOPs in **Appendix D.1.2**. Treatment or storage of any hazardous waste will not occur in this mixing tank, and therefore, the mixing tank is not subject to the standards set forth in Subpart CC.

0.3 40 CFR 264.1083 Determination of Waste Characteristics

The CS Clean facility will receive one of six spent granulate types contained in spent Cleansorb columns. All spent Cleansorb columns received from off-site will not contain any volatile organic material or be accepted by the site. Information on the procedure to determine waste characteristics, including volatile organic concentration at the point of waste origin is detailed in **Section C**.

Waste characterization will be reviewed and updated at least once every twelve months or whenever there is a change to the source generation.

0.4 40 CFR 264.1084 – Standards: Tanks

As demonstrated in **Section O.2** above, the facility does not operate any storage tanks for the use of storage or management of waste. As such, the facility is exempt from the requirements and standards set forth in 40 CFR 264.1084.

0.5 40 CFR 264.1085 – Standards: Surface Impoundments

Proposed operations at CS Clean include storage and treatment of waste in containers only. The facility will not use any surface impoundments for management of hazardous waste. As such, the facility is not subject to the provisions of 40 CFR 264.1085.

0.6 40 CFR 264.1086 – Standards: Containers

The CS Clean facility will store and manage waste only in containers. However, spent Cleansorb columns will not contain any VO content. Therefore, the average VO content of hazardous waste contained in the containers will in accordance with 40 CFR 264.1082(c)(1), the containers used at the CS Clean facility are not subject to the standards for containers pursuant to 40 CFR 264.1086.

0.7 40 CFR 264.1087 – Standards: Closed-Vent Systems and Control Devices

The CS Clean facility operates an air pollution control device to control emissions of hazardous air pollutants from the purging of Cleansorb columns and the treatment of spent granulate using copper sulfate. However, as demonstrated in Section O.2 above, the facility does not treat or store any waste with volatile organic content greater than 500 ppm. Therefore, the facility is not subject to the requirements for closed-vent systems and control devices as listed in 40 CFR 264.1087.

0.8 40 CFR 264.1089 – Recordkeeping Procedures

The facility will maintain records of each hazardous waste determination demonstrating VO content below 500 parts per million (ppm) for a minimum of three years. Hazardous waste determinations will be conducted at least once every twelve months, as a condition of the exemption under 40 CFR 264.1082 (c)(1).

Records will include:

- Records of the information used for each waste determination (e.g., test results, measurements, calculations, and other documentation) in the facility operating log.

If analysis results for waste samples are used for the waste determination, records will include the date, time, and location that each waste sample is collected (40 CFR 264.1083)

0.9 40 CFR 264.1090 – Reporting Requirements

Upon discovery of the average VO content of managed waste exceeding 500 ppm, CS Clean will report the exceedance to the Arizona Department of Environmental Quality (ADEQ) and U.S. Environmental Protection Agency (EPA). The facility shall include in its report the date and time of discovery of the noncompliance and any corrective actions the facility took to correct the noncompliance and prevent any recurring noncompliance. This report will be submitted within fifteen days of discovery of the noncompliance.

