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N.1 SUBPART BB EQUIPMENT LEAKS

The Subpart BB regulations are applicable to equipment that contains or contacts hazardous wastes with organic concentrations of at least ten (10) percent by weight.

The Subpart BB regulations further define equipment as being in light liquid service, gas/vapor service, and heavy liquid service. The Parker facility has determined that the Subpart BB requirements are not applicable, based on the characteristics of the spent carbon managed at the facility. This determination is based on review of waste profile information, in accordance with the requirements of 264.1063(d)(2).

A RCRA Subpart BB Compliance Plan is included in Appendix XIX of the Part B Permit Application.