

ATTACHMENT J
RECORD KEEPING AND REPORTING

Table of Contents

Page J-

1.	Records and Reporting	1
1.1	OPERATING RECORD	1
1.2	ADDITIONAL RECORDS	1
1.2.1	Training Records	1
1.2.2	Unmanifested Waste	1
1.2.3	Annual Report	2
1.3	RECORDS RETENTION	2

List of Tables

Table J-1	Permitted Facility Recordkeeping Requirements
Table J-2	Generator Recordkeeping Requirements

1. Records and Reporting

1.1 OPERATING RECORD

[40 CFR 264.73]

A critical component of the Facility's Operating Record is Triumvirate's electronic data management called "Wasteland." Records maintained in Wasteland include waste profiles for waste streams approved for acceptance at the Facility, electronic copies of manifests for waste accepted and rejected, Waste acceptance analyses (where analytical data are included as part of the accepted waste profile, fingerprint analyses, waster tracking data, i.e., when the waste was received, storage/treatment disposition(s), and length of time the waste is/was at the facility.

1.2 ADDITIONAL RECORDS

The following additional records are maintained at the Facility as part of the Operating Record outside of Wasteland as hard copies and/or electronic copies. Electronic records are maintained in the lab and the onsite administration building. Operating records are also maintained via the web for remote access.

1.2.1 Training Records

[40 CFR 264.16 (e)]

Training records on current employees will be maintained until the closure of the Permitted Units. Training records for previous employees will be retained for at least 3 years from the date the employee last worked at the Facility.

1.2.2 Unmanifested Waste

[40 CFR 264.76]

Facility procedures prohibit acceptance of unmanifested wastes. However, if unmanifested wastes are received, the Facility will first attempt to locate the generator and obtain a valid manifest. If this is not possible, an unmanifested waste report will be prepared in accordance with 40 CFR 264.76. The report will be submitted to ADEQ within 15 days of receiving the waste. The report will contain the following:

- The EPA identification number, name and address of the Facility;
- The date the Facility received the waste;
- The EPA identification number, name and address of the generator site;
- The EPA identification number, name and address of the hauler;
- A description and quantity of each unmanifested hazardous waste received;
- The storage location for each hazardous waste;
- A certification signed by a responsible corporate officer; and,
- A brief explanation of why waste was not manifested, if known.

1.2.3 Annual Report [R18-8-264.I.]

Annual Reports required of Permitted Hazardous Waste Facilities will be prepared and submitted to ADEQ on or before March 1 each year. The report will identify the hazardous waste management activities for the previous year.

1.3 RECORDS RETENTION

Table J-1 summarizes the Facility's recordkeeping and retention requirements as a permitted hazardous waste facility. Table J-2 summarizes the Facility's recordkeeping and retention requirements as a hazardous waste generator.

Table J-1
Permitted Facility Recordkeeping Requirements

Record	Retention Time	Regulatory Citation
A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment and/or storage at the facility.	Until Facility closure	40 CFR 264.73(b)(1); 40 CFR, Part 264, Appendix I
The location of each hazardous waste within the facility and the quantity at each location. This information must include cross-references to manifest document numbers if the waste was accompanied by a manifest. This information must be maintained in the operating record until closure of the facility.	Until Facility closure	40 CFR 264.73(b)(2); 40 CFR, Part 264, Appendix I
Records and results of waste analyses and waste determinations	A minimum of three years from the date the waste determination was performed.	40 CFR 264.73(b)(3)
Summary reports and details of all incidents that require implementing the contingency plan	Three years	40 CFR 264.73(b)(4)
Records and results of inspections	A minimum of three years from the date of the inspection.	40 CFR 264.73(b)(5)
Monitoring, testing or analytical data, and corrective action where required	A minimum of three years from the date corrective action is completed.	40 CFR 264.73(b)(6)
Notices to generators	A minimum of three years from the date waste is accepted.	40 CFR 264.73(b)(7)
All closure cost estimates	Until Facility Closure	40 CFR 264.73(b)(8)

Table J-1
Permitted Facility Recordkeeping Requirements

Record	Retention Time	Regulatory Citation
A certification no less often than annually, that the permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the permittee to be economically practicable; and the proposed method of treatment, storage or disposal is that practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment.	Current certification until Facility Closure.	40 CFR 264.73(b)(9)
Copies of notices and the certification of demonstration, if applicable, required by the generator or owner/operator for treatment of storage of a restricted waste	A minimum of three years from the date of delivery.	40 CFR 264.73(b)(11) & (15); 40 CFR 268.7
Annual Hazardous waste report	Until Facility Closure	
Certification of Major Repairs to Tank Systems	Until Facility Closure	40 CFR 264.73(b)(19)
Hazardous Waste Manifests for shipments received and accepted by the Facility	A minimum of three years from the date of delivery.	40 CFR 264.71(a)(2)(6); 40 CFR 264.71(b)(5)
Training records	<ul style="list-style-type: none"> • Training records on current personnel: Until Facility Closure. • Training records on former employees: A minimum of three years from the date the employee last worked at the facility. 	

Table J-2
Generator Recordkeeping Requirements

Record	Retention Time	Regulatory Citation
Hazardous Waste Manifests	A minimum of three years from the date the waste was accepted by the initial transporter.	40 CFR 262.40(a)
Records of test results, waste analyses, and other determinations	A minimum of three years from the date that the waste was last sent to an off-site treatment, storage, or disposal facility.	40 CFR 262.11(f)
Copies of notices, certifications, restricted waste determinations	A minimum of three years from the date that the waste was last sent to an off-site treatment, storage, or disposal facility.	40 CFR 262.11(f); 40 CFR 268.7(a)(8)
Notices of intent to export hazardous waste	A minimum of three years from the date the hazardous waste was accepted by the initial transporter	40 CFR 262.57(a)(1)
Copy of each EPA Acknowledgement of Consent to export hazardous waste	A minimum of three years from the date the	40 CFR 262.57(a)(2)

Table J-2
Generator Recordkeeping Requirements

Record	Retention Time	Regulatory Citation
	hazardous waste was accepted by the initial transporter	
Copy of each confirmation of delivery of hazardous waste consignee of an exported shipment of hazardous waste	A minimum of three years from the date the hazardous waste was accepted by the initial transporter	40 CFR 262.57(a)(3)
Annual report of hazardous waste exports	A minimum of three years from the due date of the report.	40 CFR 262.57(a)(4)