

SECTION J
OPERATING RECORD

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SECTION J – OPERATING RECORD

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1.0 OPERATING RECORD

An Operating Record is maintained at the CPCC plant to document all information necessary to verify regulatory compliance with administrative requirements. The Operating Record exists as a compilation of various files, forms, data, databases, records, and reports located in the office complex at the plant. Where not specified in this section, the Operating Record will be kept at the plant until the closure of the plant or as specified in the most current regulations at 40 CFR 264.73, whichever is earlier.

All plant personnel who are responsible for regulated recordkeeping and reporting functions will be trained on the applicable regulatory requirements and the permit conditions relevant to their administrative job duties. This training includes classroom training and supervised on-the-job training activities regarding the regulations, the Operating Record, and the recordkeeping systems at the plant.

CPCC operates a cement manufacturing plant that uses fuel quality waste (FQW) as a supplementary fuel in the manufacture of the product. CPCC receives all of the FQW from the on-site fuel blending facility owned and operated by Systech Environmental Corporation (Systech). As such, Systech receives all of the wastes from offsite and maintains records of those receipts, including manifests and testing results. CPCC maintains records of only those activities for which they are responsible.

1.1 Manifests

The CPCC Operating Record will not include copies of completed manifests since all receiving of hazardous waste shipments is accomplished by the Systech facility that is co-located within the CPCC property.

1.2 Location of Each Waste in the Facility and Quantity at Each Location

CPCC does not receive wastes for storage, and thus records of the location, description, and quantity of waste received in bulk shipments are not maintained within the CPCC Operating Record. All such records are maintained within the Systech operations.

However, CPCC maintains records of all transfers of FQW from the Systech facility to be burned in the CPCC Cement kilns. This information, including the date and volume combusted is recorded in the CPCC Operating Record.

1.3 Records and Results of Waste Analyses

The results of the analyses performed in accordance with the Waste Analysis Plan are recorded and included in the Operating Record. Analyses associated with the FQW transferred from Systech to CPCC are defined as part of the Feedstream Analysis Plan (FAP) that has been created per the requirements of the Hazardous Waste Combustor MACT, 40 CFR 63 Subpart EEE. As such, the recordkeeping requirements associated with the analyses conducted per the FAP are beyond the scope of this permit.

CPCC conducts periodic analyses of site-generated wastes associated with the combustion operation, namely cement kiln dust (CKD) and kiln brick.

Results of these analyses are maintained within the Operating Record until closure of the plant.

1.4 Summary Reports of Incidents

The time, date, and details of any incident that requires implementation of the Contingency Plan will be noted in the Operating Record. The Emergency Coordinator will submit a written report to ODEQ within 15 days after an incident. The information in such a report is detailed in the Contingency Plan.

1.5 Results of Inspections

Reports on the daily, weekly, monthly, and annual inspections conducted in accordance with the CPCC inspection schedule for the plant are retained for at least three years in an inspection log as part of the Operating Record. The inspection schedule and further information on compliance with inspection requirements, as well as the inspection report forms are provided in Section F, Procedures to Prevent Hazards, of this document.

1.6 Results of Monitoring, Testing, or Analytical Data

Results of monitoring, testing, and analytical data, as required by the regulations and the permit conditions, are recorded and kept on file as part of the Operating Record.

1.7 Notices to Waste Generators

Since CPCC only receives wastes from the on-site Systech facility, Notices to Generators are not maintained in the CPCC Operating Record, but these records may be found in the Systech Operating Record.

1.8 Biennial Report

A biennial report is prepared and submitted to ODEQ by March 1 of each even-numbered year, as required by the regulations. It is submitted on the required forms or electronically. The report covers plant activities during the previous calendar year. The following information is provided:

- The USEPA identification number, name and address of the facility;
- The calendar year covered by the report;
- The USEPA identification number or name and address (if unnumbered) of each waste producer from which waste was received (Systech);
- A description and the quantity of each hazardous waste stored, treated, or received during the previous year (listed by USEPA identification number of the producer);
- The method of treatment, storage, or disposal for each waste; and
- A certification signed by the owner, operator, or an authorized representative.

1.9 Training Records

The following training information is maintained at the plant as part of the Operating Record.

- Job title for each position at the plant relating to hazardous waste management, and the name of the employee(s) filling each position.
- Written job descriptions for each position, including the requisite skill, education, qualifications, and duties of the employees assigned to each position.
- Written description of the type and amount of both introductory and continuing training given to each person filling a position.
- Records that document that the appropriate training or job experience described above has been given to and completed by the plant personnel.

Training records on current personnel are kept for three years following closure of the plant. Training records on former employees are kept for at least three years from the date the employee last worked at the plant.

1.10 Closure

All closure cost estimates for the plant are maintained as part of the Operating Record, including the annual adjustments for inflation.

1.11 Waste Minimization Plan

The plant maintains a waste minimization plan in the Operating Record. This program's purpose is to reduce the volume and toxicity of hazardous waste generated, to the degree determined by the plant to be economically practicable. The proposed method of treatment, storage, or disposal is that practicable method currently available to the plant that minimizes the present and future threat to human health and the environment. The plant certifies annually that there is a program in place.

1.12 Land Ban Notification

The plant maintains a copy of the notice and/or the certification required by the generator or 'the owner or operator' under 40 CFR 268.7 or 268.8 in the Operating Record.

1.13 RCRA Air Emission Standards

The plant maintains records in accordance with the 40 CFR 264 Subpart BB regulations to demonstrate compliance with the RCRA Air Emission Standards. These records are kept for the time specified in the regulations.

2.0 MONTHLY REPORTS

The plant submits the monthly reports required by OAC 252:205-9-2 identifying the hazardous waste managed at the plant. The reports are submitted within 30 days of the end of each month in which hazardous waste is received.