

**SECTION J**  
**OPERATING RECORD**

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# SECTION J – OPERATING RECORD

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## SECTION J – OPERATING RECORD

### 1.0 OPERATING RECORD

An Operating Record is maintained at the facility 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 facility in either paper or electronic format. Where not specified in this section, the Operating Record will be kept at the facility until the closure of the facility, or as specified in the most current regulations at 40 CFR 264.73, whichever is earlier.

All facility 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 facility.

#### 1.1 Manifests

The Operating Record includes copies of the completed manifests for each shipment accepted for use. The manifest records the names, addresses, and telephone numbers of the waste producer, the hauler, and the facility operator. The manifest also lists the source, identity, volume, and type of container for each load of waste received.

The manifest accompanying the shipment will be obtained from the transporter, signed and dated to certify receipt of the waste. Discrepancies are noted on each copy of the manifest. One copy of the completed manifest is returned to the transporter; one copy is retained at the facility for at least three years as part of the Operating Record; and a third copy is sent to the waste producer within thirty days of the date of receipt of the waste. Hard copies will be maintained for a minimum of three years.

Transfers of FQW to the co-located CPCC operations are not conducted with a manifest since the transfer is on-site. Instead, records of all transfers are maintained in the Operating Record.

##### 1.1.1 Manifest Discrepancies

Each manifest is examined for discrepancies as to type or quantity of material. Manifest discrepancies are differences between the quantity or type of hazardous waste designated on the manifest or shipping paper and the quantity or type of hazardous waste a facility actually receives. Significant discrepancies in type are obvious differences that can be discovered by inspection or waste analysis, e.g., waste acid substituted for waste solvent. Significant discrepancies in quantity are:

- For bulk waste, variations greater than ten percent in weight; and
- For batch waste, any variation in piece counts, such as a discrepancy of one drum in a truckload.

Upon discovering a significant discrepancy, an attempt is made to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within fifteen days after receiving

the waste, the facility will submit to ODEQ a letter describing the discrepancy, attempts to reconcile it, and a copy of the manifest or shipping paper in question.

### **1.1.2 Unmanifested Waste Reports**

If the facility receives a waste shipment without an accompanying manifest or shipping paper, a report will be prepared and submitted to ODEQ within fifteen days, using the report form specified by ODEQ. The report will be designated 'Unmanifested Waste Report' and would include the following information:

- The USEPA identification number, name and address of the facility;
- The date the facility received the waste;
- The USEPA identification number (unless the generator is a VSQ generator), name and address of the producer;
- The USEPA identification number, name and address of the hauler;
- A description and the quantity of each unmanifested hazardous waste received;
- The method of treatment, storage, or disposal for each hazardous waste;
- The certification signed by the owner, operator, or representative; and
- A brief explanation of why the waste was not manifested, if known.

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

Information on the location, description, and quantity of waste received in bulk shipments is recorded in a receiving log which may be kept in hardcopy or electronically. Information about when these wastes are burned is recorded in the daily tank inventory records.

Information about the location of containerized waste is maintained through the use of a container tracking system. Information about the disposition of containerized waste is recorded in processing reports.

### **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. The types of analyses conducted and sampling procedures utilized are described in the Waste Analysis Plan, Section C.

### **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 fifteen 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 Systech inspection schedule for the facility 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 Generator Qualifications and Notifications**

A file for each waste stream is maintained in the Operating Record. Included in this file is the generator's Waste Qualification form, the results of the qualification analysis, and a copy of the notification that the facility has appropriate permits.

## **1.8 Notices to Waste Generators**

Waste generators are informed in writing that the facility has the appropriate permits for and will accept the waste the generator is shipping. Copies of these notices to the generators are kept as part of the Operating Record.

## **1.9 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 facility 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;
- 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.

## 1.10 Training Records

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

- Job title for each position at the facility 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 that are 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 facility personnel.

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

## 1.11 Closure

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

## 1.12 Waste Minimization Plan

The facility 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 facility to be economically practicable. The proposed method of treatment, storage, or disposal is that practicable method currently available to the facility that minimizes the present and future threat to human health and the environment. The facility certifies annually that there is a program in place.

## 1.13 Land Ban Notification

The facility 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.

## 1.14 RCRA Air Emission Standards

The facility maintains records in accordance with 40 CFR 264 Subpart BB and the Clean Air Act (CAA) for inspecting and repairing equipment in accordance with 40 CFR 63, Subpart DD that also demonstrate compliance with the RCRA Air Emission Standards. These records are kept for the time specified in the applicable RCRA and CAA regulations.

## **2.0 MONTHLY REPORTS**

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