

<u>SUBJECT</u>		<u>DATE</u>
1320.	Treated Hazardous Waste Used as Dust Suppressant	FEB 28, 2019
1321.	Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE MAR 7, 2019
1322.	Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE MAR 14, 2019
1323.	Decharacterized Wastes, ≤90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE MAR 21, 2019
1324.	Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE MAR 28, 2019
1325.	PCB Decontamination Standard with No Decontamination Performed	ENCORE APR 4, 2019
1326.	PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required?	ENCORE APR 11, 2019
1327.	PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? – The Sequel	ENCORE APR 18, 2019
1328.	PCB Concentrations and Micrograms per Centimeters Squared (µg/cm ²)	ENCORE APR 25, 2019
1329.	Operating Record vs. Operating Log	ENCORE MAY 2, 2019
1330.	Operating Records Not Referenced in the “Operating Record” Regulations	ENCORE MAY 9, 2019

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TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

FROM: PAUL W. MARTIN, RCRA Subject Matter Expert
CHPRC Environmental Protection, Hanford, WA

SUBJECT: OPERATING RECORDS NOT REFERENCED IN THE “OPERATING RECORD” REGULATIONS

DATE: MAY 9, 2019

<u>CHPRC Projects</u>	<u>CH PRC - Env. Protection</u>	<u>MSA</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Tania Bates Rene Catlow Richard Clinton Larry Cole Laura Cusack John Dent Lorna Dittmer Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Sasa Kosjerina Melvin Lakes Richard Lipinski Stuart Mortensen Dave Richards Phil Sheely Connie Simiele Jeff Westcott	Jeff Bramson Bob Bullock Frank Carleo Bill Cox Noah Cruz Jeanne Elkins Jonathan Fullmer Ted Hopkins Tad Karschnia Barry Lawrence Jim Leary Diane Leist Mitch Marrott Stewart McMahan Brian Mitcheltree Anthony Nagel Linda Petersen Fred Ruck Sean Sexton Dave Shea Ray Swenson Kat Thompson Wayne Toebe Daniel Turlington Dave Watson	Brett Barnes Michael Carlson Mike Demiter Kip George Jerry Cammann Jeff Ehli Garin Erickson Panfilo Gonzalez Jr. Dashia Huff Mark Kamberg Jon McKibben Saul Martinez Matt Mills Carly Nelson Michelle Oates Eric Pennala Jon Perry Christina Robison Christian Seavoy David Shaw John Skoglie Lana Strickling Greg Sullivan	(TBD) <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Duane Carter Tony McKarns	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Tom Gilmore Rob Gregory James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Tom Moon Chuck Mulkey Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: Operating Records Not Referenced in the “Operating Record” Regulations

Q: In last week’s Two Minute Training, it was discussed what specific types of records must be maintained in the facility’s “operating record”. The specific types of records are detailed in [WAC 173-303-380](#), “Facility recordkeeping” and in the equivalent Federal regulations at 40 CFR [264.73/265.73](#), “Operating record”. Are the references to these specific types of operating records all-inclusive, or are there other operating record references outside of the operating record regulations?

A: Yes there are!

A word search for the term “operating record” just in the [40 CFR 265](#) interim status regulations revealed several instances of documents required to be maintained in the operating record such as:

- Documentation if State or local authorities decline to enter into preparedness and prevention arrangements or agreements;
- Use of alternate tank inspection schedules;
- Information if food chain crops are grown on land treatment facilities;
- Documentation of [Subpart AA](#) compliance under 40 CFR parts 60, 61, or 63;
- Implementation schedules to install Subpart AA closed-vent systems;
- Information concerning [Subpart BB](#) equipment, location, type, compliance method, etc.;
- Documentation of [Subpart CC](#) air emission control equipment design.

So even though not specifically referenced as operating records in the interim status regulations at 40 CFR 265.73, these documents are referenced elsewhere in 40 CFR 265 as operating records and hence must be available for inspection by State and Federal agencies.

SUMMARY:

- Operating record requirements are specifically detailed in WAC 173-303-380 and 40 CFR 264/265.73.
- Operating records are also referenced in other parts of the WAC and 40 CFR regulations.
- All records noted as operating records must be maintained in the operating record and available for inspection by State and Federal agencies.

Excerpts of operating records from 40 CFR 265, but not referenced in 40 CFR 265.73 are attached. If you have any questions, please contact me at [Paul W Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 5/9/19

FILE: 2MT\2019\050919.rtf

PG: 1

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Operating Records Not Referenced in the “Operating Record” Regulations

40 CFR Subpart C Preparedness and Prevention

40 CFR Part 265.37 Arrangements with local authorities

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the **operating record**.

40 CFR Subpart J Tank Systems

40 CFR Part 265.195 Inspections

(c) Owners or operators of tank systems that either use leak detection equipment to alert facility personnel to leaks, or implement established workplace practices to ensure leaks are promptly identified, must inspect at least weekly those areas described in paragraphs (b)(1) through (3) of this section. **Use of the alternate inspection schedule must be documented in the facility's operating record.** This documentation must include a description of the established workplace practices at the facility.

40 CFR Subpart M Land Treatment

40 CFR Part 265.276 Food chain crops

- (c)
- (2)
- (iv) Future property owners are notified by a stipulation in the land record or property deed which states that the property has received waste at high cadmium application rates and that food chain crops must not be grown except in compliance with paragraph (c)(2) of this section.

[Comment: As required by §265.73, if an owner or operator grows food chain crops on his land treatment facility, he must place the information developed in this section in the operating record of the facility.]

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Operating Records Not Referenced in the “Operating Record” Regulations

40 CFR Subpart AA - Air Emission Standards for Process Vents

40 CFR Part 265.1030

(d) The requirements of this subpart do not apply to the process vents at a facility where the facility owner or operator certifies that all of the process vents that would otherwise be subject to this subpart are equipped with and operating air emission controls in accordance with the process vent requirements of an applicable Clean Air Act regulation codified under 40 CFR part 60, part 61, or part 63. The documentation of compliance under regulations at 40 CFR part 60, part 61, or part 63 shall be kept with, or made readily available with, the facility **operating record**.

40 CFR Part 265.1035 Recordkeeping requirements

(b) Owners and operators must record the following information in the facility **operating record**:

(1) For facilities that comply with the provisions of §265.1033(a)(2), an implementation schedule that includes dates by which the closed-vent system and control device will be installed and in operation. The schedule must also include a rationale of why the installation cannot be completed at an earlier date. The implementation schedule must be in the facility **operating record** by the effective date that the facility becomes subject to the provisions of this subpart.

40 CFR Subpart BB - Air Emission Standards for Equipment Leaks

40 CFR Part 265.1064 Recordkeeping requirements

(b) Owners and operators must record the following information in the facility **operating record**:

(1) For each piece of equipment to which subpart BB of part 265 applies:

- (i) Equipment identification number and hazardous waste management unit identification.
- (ii) Approximate locations within the facility (e.g., identify the hazardous waste management unit on a facility plot plan).
- (iii) Type of equipment (e.g., a pump or pipeline valve).
- (iv) Percent-by-weight total organics in the hazardous waste stream at the equipment.
- (v) Hazardous waste state at the equipment (e.g., gas/vapor or liquid).
- (vi) Method of compliance with the standard (e.g., “monthly leak detection and repair” or “equipped with dual mechanical seals”).