

<u>SUBJECT</u>		<u>DATE</u>	
1188.	RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II	ENCORE	AUG 11, 2016
1189.	RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario III	ENCORE	AUG 18, 2016
1190.	Product Spills and Waste Determinations	ENCORE	AUG 25, 2016
1191.	Product Spills, Waste Determinations, and LDR	ENCORE	SEP 1, 2016
1192.	Regulatory Status of Caustic Rinse Waters Contaminated with Trace Solvents	ENCORE	SEP 8, 2016
1193.	Regulatory Status of Sand Blast Grit Contaminated with Trace Listed Solvents	ENCORE	SEP 15, 2016
1194.	Hazardous Waste "F" Listings and Trace Contamination	ENCORE	SEP 22, 2016
1195.	Hazardous Waste "F" Listings and Trace Contamination – Again!	ENCORE	SEP 29, 2016
1196.	Hazardous Waste Determinations and Phase Separation		OCT 6, 2016
1197.	Asbestos and DOT Relief	ENCORE	OCT 13, 2016
1198.	PCB Containers and Concentration of PCBs	ENCORE	OCT 20, 2016
1199.	PCB Analytical Waste Disposal Requirements	ENCORE	OCT 27, 2016
1200.	PCB Analytical Waste Disposal Requirements – Water vs. Organic Liquids and Non-aqueous Inorganic Liquids		NOV 3, 2016
1201.	Listed Waste Codes and Pre-RCRA Wastes	ENCORE	NOV 10, 2016
1202.	Purpose of the ≤90-day Hazardous Waste Accumulation Exemption		NOV 17, 2016
1203.	Used Oil Eligibility for Turkey and Ham Oils	ENCORE	NOV 23, 2016
1204.	PCB Reporting and Recordkeeping Relief	ENCORE	DEC 1, 2016
1205.	Defining Criteria for Household Waste Exclusion	ENCORE	DEC 8, 2016
1206.	The Household Waste Exclusion and Renovation Debris	ENCORE	DEC 15, 2016
1207.	'Twas the Night before Christmas – The Twenty-Fourth Annual Edition		DEC 24, 2016
1208.	The Household Waste Exclusion and Renovation Debris – Part II	ENCORE	DEC 29, 2016
1209.	Absorbent Additions and Treatment		JAN 5, 2017
1210.	Frozen RCRA Wastewater - DOT Liquid or Solid When Manifested?	ENCORE	JAN 12, 2017
1211.	DOT Marking Specifications for the "UN", "NA" and "ID" Markings		JAN 19, 2017
1212.	Satellite Accumulation within a ≤90-day Accumulation Area	ENCORE	JAN 26, 2017
1213.	Washington State-Only Dangerous Waste Markings – Accumulation vs. Pre-Transport	ENCORE	FEB 2, 2017
1214.	RCRA Empty Tanker Trailers and Listed Waste Codes	ENCORE	FEB 9, 2017
1215.	RCRA Empty vs. DOT Empty	ENCORE	FEB 16, 2017
1216.	RCRA Empty vs. DOT Empty II	ENCORE	FEB 23, 2017
1217.	Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents	ENCORE	MAR 2, 2017
1218.	Multiple Characteristic and Listed Hazardous Waste Codes and the "in lieu of" LDR Principle	ENCORE	MAR 9, 2017
1219.	LDR Storage Prohibitions and the One-Year Rule	ENCORE	MAR 16, 2017
1220.	LDR Storage Prohibitions and Treated Wastes	ENCORE	MAR 23, 2017
1221.	LDR Storage Prohibitions and Treated Hazardous Debris or Contaminated Soil		MAR 30, 2017
1222.	LDR Requirements for Universal Wastes		APR 6, 2017
1223.	LDR Requirements for Spent Lead-Acid Batteries Being Reclaimed		APR 13, 2017
1224.	When is When Defined for the RCRA Phrase "When Reclaimed"?	ENCORE	APR 20, 2017
1225.	RCRA Characteristic of Ignitability and DOT Oxidizers	ENCORE	APR 27, 2017
1226.	Safety Data Sheets (SDSs) and Hazardous Wastes	ENCORE	MAY 4, 2017
1227.	Containers and Tanks – RCRA Wastes vs. TSCA PCB Wastes	ENCORE	MAY 11, 2017
1228.	Universal Waste Lamps and Prohibition on Crushing	ENCORE	MAY 18, 2017
1229.	Operating Record vs. Operating Log		MAY 25, 2017

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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 RECORD VS. OPERATING LOG

**DATE:** MAY 25, 2017

<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 Roni Ashley Tania Bates Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Jim McGrogan Stuart Mortensen Dean Nester Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Ron Brunke Bob Bullock Bill Cox Laura Cusack Lorna Dittmer Ted Hopkins Sasa Kosjerina Jim Leary Rick Oldham Anthony Nagel Robert Nielson Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson Joel Williams	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Jon McKibben Saul Martinez Jon Perry Christina Robison Lana Strickling Lou Upton	(TBD)  <u>DOE RL, ORP, WIPP</u>  Mary Beth Burandt Duane Carter Cliff Clark Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Lori Fritz Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Dan Kimball Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Marty Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Mandy Pascual Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Kyle Webster Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** Operating Record vs. Operating Log Universal Waste Lamps and Prohibition on Crushing

**Q:** A customer is having difficulty grasping the concept of the RCRA “operating record”. What does an operating record consist of and how does an operating record differ from an operating log?

**A:** Per [WAC 173-303-380](#), “Facility recordkeeping” [*40 CFR 264.73 / 265.73*, *Operating Record*], the owner or operating of a treatment, storage or disposal facility (TSDF) must keep a written operating record at their facility. The regulation specifies what information must be recorded as it becomes available and that the operating record must be maintained until facility closure. Examples of operating record information include:

- Descriptions and quantities of hazardous/dangerous waste received or managed on-site;
- Methods and dates of dangerous waste treatment, storage, or disposal at the facility;
- Locations and quantities of each dangerous waste within the facility;
- Waste analysis and waste determination records and results;
- Summary reports and details of all incidents that implementing the contingency plan;
- Inspection records and results;
- Monitoring, testing, or analytical data, and corrective actions;
- Closure and post-closure cost estimates;
- For off-site facilities, copies of notices to generators that facility has proper permits;
- Disposal records, LDR notices and certifications;
- Waste minimization program annual certifications, and;
- Major tank system repair certifications.

Note that other regulatory citations reference other documents that must be or should be included in the operator record, therefore WAC 173-303-380 is not all-inclusive of operating record requirements.

Concerning operating record versus operating log, EPA originally proposed “operating log”. However, a commenter suggested using “operating record” to allow for the use of “automatic data processing systems”, i.e., network computer systems. EPA agreed since the use of computer based systems would be consistent with the recordkeeping system flexibility intended by the proposed regulations. EPA clarified in the [May 19, 1980 Federal Register](#), page 33189 that:

*“Further, the large area of some facilities and the variety of functions performed at some facilities, make it very unlikely that all required information would be recorded in one operating log at only one location. In writing the proposed rules the Agency assumed a number of logs, or records, would be maintained at a site. All such records at a facility taken together would then constitute the facility operating log.*

*The term ‘operating record’ more accurately reflects EPA’s intentions and expected commercial practice, than does the term ‘operating log’. EPA has therefore changed all references in the final regulations from ‘log’ to ‘record.’”*

### SUMMARY:

- The owner or operator of a TSDF must keep a written operating record at their facility.
- WAC 173-303-380 and other citations define which documents are required in an operating record.
- An operating record is similar to an operating log, however, the operating record is not one operating log but a number of logs, or records maintained at a site.

Excerpts from WAC 173-303 are attached. If you have any questions, contact me at [Paul\\_W\\_Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

**FROM:** Paul W. Martin

**DATE:** 5/25/17

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** Operating Record vs. Operating Log

### **WAC 173-303-380 Facility recordkeeping.**

(1) Operating record. The owner or operator of a facility must keep a written operating record at their facility. The following information must be recorded, as it becomes available, and maintained in the operating record until closure of the facility:

(a) A description of and the quantity of each dangerous waste received or managed on-site, and the method(s) and date(s) of its treatment, storage, or disposal at the facility as required by subsection (2) of this section, recordkeeping instructions;

(b) The location of each dangerous waste within the facility and the quantity at each location. For disposal facilities, the location and quantity of each dangerous waste must be recorded on a map or diagram of each cell or disposal area. For all facilities, this information must include cross-references to specific manifest document numbers, if the waste was accompanied by a manifest;

(c) Records and results of waste analyses, waste determinations (as required by 40 C.F.R. Parts 264 and 265, Subpart CC), and trial tests required by WAC 173-303-300, General waste analysis, and by 40 C.F.R. sections 264.1034, 264.1063, 264.1083, 265.1034, 265.1063, 265.1084, 268.4(a), and 268.7. Note that data from laboratory analyses for 40 C.F.R. 268.4(a) and 268.7 must meet the requirements of WAC 173-303-110;

(d) Summary reports and details of all incidents that require implementing the contingency plan, as specified in WAC 173-303-360 (2)(k);

(e) Records and results of inspections as required by WAC 173-303-320 (2)(d), General inspection (except such information need be kept only for five years);

(f) Monitoring, testing, or analytical data, and corrective action where required by 40 C.F.R. Part 265 Subparts F through R and sections 265.1034 (c) through (f), 265.1035, 265.1063 (d) through (i), 265.1064, and 265.1083 through 265.1090 for interim status facilities (incorporated by reference at WAC 173-303-400(3)), and by WAC 173-303-630 through 173-303-695 and 40 C.F.R. sections 264.1034 (c) through (f), 264.1035, 264.1063 (d) through (i), 264.1064, and 264.1082 through 264.1090 for final status facilities (incorporated by reference at WAC 173-303-690, 173-303-691, and 173-303-692). Note that data provided from laboratory analyses for WAC 173-303-400(3) which incorporates by reference 40 C.F.R. Part 265 Subparts F through R, WAC 173-303-140 (4)(b), 173-303-395(1), 173-303-630 through 173-303-680, 173-303-693 and 173-303-695, 40 C.F.R. 268.4(a) and 268.7 must meet the requirements of WAC 173-303-110;

(g) All closure and post-closure cost estimates required for the facility;

(h) For off-site facilities, copies of notices to generators informing them that the facility has all appropriate permits, as required by WAC 173-303-290, Required notices;

(i) Records of the quantities (and date of placement) for each shipment of hazardous waste placed in land disposal units under an extension to the effective date of any land disposal restriction granted pursuant to 40 C.F.R. 268.5, a petition pursuant to 40 C.F.R. 268.6, and the applicable notice required by a generator under 40 C.F.R. 268.7(a);

(j) For an off-site treatment facility, a copy of the notice, and the certification and demonstration, if applicable, required by the generator or the owner or operator under 40 C.F.R. 268.7;

(k) For an on-site treatment facility, the information contained in the notice (except the manifest number), and the certification and demonstration if applicable, required by the generator or the owner or operator under 40 C.F.R. 268.7;

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** Operating Record vs. Operating Log

- (l) For an off-site land disposal facility, a copy of the notice, and the certification and demonstration if applicable, required by the generator or the owner or operator of a treatment facility under 40 C.F.R. 268.7;
  - (m) For an on-site land disposal facility, the information contained in the notice required by the generator or owner or operator of a treatment facility under 40 C.F.R. 268.7, except for the manifest number;
  
  - (n) For an off-site storage facility, a copy of the notice, and the certification and demonstration if applicable, required by the generator or the owner or operator under 40 C.F.R. 268.7;
  
  - (o) For an on-site storage facility, the information contained in the notice (except the manifest number), and the certification and demonstration if applicable, required by the generator or the owner or operator under 40 C.F.R. 268.7;
  
  - (p) Any records required under WAC 173-303-280(6);
  
  - (q) A certification by the permittee no less often than annually, that the permittee has a program in place to reduce the volume and toxicity of hazardous waste that they generate 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; and
  
  - (r) Certifications of major repairs to tank systems as required by WAC 173-303-640 (7)(f).
- (2) Recordkeeping instructions. This subsection provides instructions for recording the portions of the operating record which are related to describing the types, quantities, and management of dangerous wastes at the facility. This information must be recorded, as it becomes available, and maintained in the operating record until closure of the facility, as follows:

- (a) Each dangerous waste received, treated, stored, or disposed of at the facility must be described by its common name and by its dangerous waste number(s) from WAC 173-303-080 through 173-303-104. Each listed, characteristic, and criteria waste has its own four-digit dangerous waste number. Where a dangerous waste contains more than one process waste or waste constituent the waste description must include all applicable dangerous waste numbers. If the dangerous waste number is not listed, the waste description must include the process which generated the waste;
  
- (b) The waste description must include the waste's physical form (i.e., liquid, solid, sludge, or contained gas);
  
- (c) The estimated or manifest-reported weight, or volume and density, where applicable, of the dangerous waste must be recorded, using one of the units of measure specified in Table 1, below; and

TABLE 1

Unit of Measure	Code <sup>1</sup>
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(See [WAC 173-303-380](#) for complete table)

- (d) The method(s) (by handling code(s)) of management for each dangerous waste received or managed, and the date(s) of treatment, recycling, storage, or disposal must be recorded, using the handling code(s) specified in Table 2, below.

TABLE 2 - Handling Codes for Treatment, Storage, and Disposal Methods

(See [WAC 173-303-380](#) for complete table)

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