

<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
1230. Operating Records Not Referenced in the "Operating Record" Regulations		JUN 1, 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 RECORDS NOT REFERENCED IN THE "OPERATING RECORD" REGULATIONS

DATE: JUNE 1, 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 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 264/265.73, “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” in just 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 being required to be maintained in the operating record and hence 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: 6/1/17

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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”).

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TWO MINUTE TRAINING - ATTACHMENT

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

40 CFR Subpart CC - Air Emission Standards for Tanks, Surface Impoundments, and Containers

40 CFR 265.1090 Recordkeeping requirements

(a) Each owner or operator of a facility subject to requirements in this subpart shall record and maintain the information specified in paragraphs (b) through (j) of this section, as applicable to the facility. Except for air emission control equipment design documentation and information required by paragraphs (i) and (j) of this section, records required by this section shall be maintained in the **operating record** for a minimum of 3 years. Air emission control equipment design documentation shall be maintained in the **operating record** until the air emission control equipment is replaced or otherwise no longer in service. Information required by paragraphs (i) and (j) of this section shall be maintained in the **operating record** for as long as the waste management unit is not using air emission controls specified in §§265.1085 through 265.1088 of this subpart in accordance with the conditions specified in §265.1080(d) or §265.1080(b)(7) of this subpart, respectively.

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