Appendix B-9

Recordkeeping and Reporting Plan

US ECOLOGY NEVADA

RECORDKEEPING AND REPORTING PLAN

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RECORDKEEPING AND REPORTING PLAN

This plan describes the procedures and mechanisms that US Ecology Nevada (USEN) has established to comply with the recordkeeping and reporting requirements of 40 CFR 761 Subparts J and K. Unless otherwise specified, US Ecology will maintain copies of the records or reports described in this section for at least 20 years after the chemical waste landfill is no longer used for the disposal of PCBs

1.0 MANIFEST SYSTEM

All incoming hazardous waste receipts are to be accompanied by a hazardous waste manifest, signed and dated by the generator or broker. The shipment and manifest will be inspected in accordance with the verification inspection procedures described in the Waste Analysis Plan to ensure that the waste received matches the manifest description, and to identify significant discrepancies, if any. All weight variations greater than ten (10) percent (for bulk waste) or in a piece count (for containerized shipments) are considered a significant discrepancy, and will be noted on each copy of the manifest. Obvious differences in waste type (color, presence of liquids in shipments expected to be solid, etc.) are also considered discrepancies, and will be noted.

Upon discovery of a significant discrepancy, the facility will complete the Unusual Occurrence Report. The facility will attempt to reconcile the discrepancy by contacting the waste generator by telephone. If the discrepancy cannot be resolved, the waste will be returned to the generator.

If no discrepancy is noted during the waste verification process, each copy of the manifest will be signed and dated, acknowledging waste receipt. A copy of the signed manifest will be given to the waste transporter prior to departure from the facility, and a copy will be mailed to the generator within thirty (30) days after the delivery. The facility will retain a copy of each manifest for at least three (3) years from waste shipment delivery.

Outgoing shipments of hazardous waste (i.e., on-site generated wastes, or wastes brokered to off-site hazardous waste management facilities) will also be accompanied by a manifest. Completion of the manifest will be conducted following the instructions specified in the Appendix to 40 CFR 262, or 40 CFR §761.207 - §761.208 of the TSCA Regulations. US Ecology will designate on the manifest the facility which is permitted to handle the waste described on the manifest and an alternate facility in the event that an emergency prevents

delivery to the primary designated facility. If the transporter is unable to deliver the waste to the designated or alternate facility, the transporter will be instructed to deliver the waste to another designated facility or to return the waste.

The manifest will be signed at the time of shipment, and a handwritten signature of the initial transporter (with date of acceptance) obtained. A copy of the signed manifest will be retained for three years, or until the signed copy from the designated off-site facility is received. This signed copy will be retained as a record for at least three years from the date the waste was accepted by the initial transporter. USEN will contact the initial transporter and/or the designated facility inquiring about the status of the shipment if a copy of the manifest signed by the off-site facility is not received within 35 days of the date the waste was accepted by the initial transporter. An Exception Report will be submitted to the NDEP Administrator if the copy of the signed manifest is not received within 45 days.

2.0 WORK ORDER SYSTEM

Prior to acceptance of any hazardous waste shipment received at the facility, a hazardous Waste Work Order, or equivalent, will be initiated. The following is a discussion of the Work Order system and a description of all the items that constitute the Work Order package.

2.1 Work Order Log Book

The Work Order Log Book will be used to track each hazardous shipment arriving at the facility, and to ensure that all required attachments of the Work Order Paperwork Package are included. Each approved waste shipment is assigned a Work Order Number upon their arrival at the facility. The Work Order Log Book will contain a column for the Work Order Number, customer/generator name, date of verification analysis receipt, dates of PCB destruction certificates

receipt, date the Work Order was completed, and initials of the Work Order data entry person.

2.2 Work Order

The Work Order is the central document of the paperwork package and will be utilized for each shipment that arrives at the facility, or in the case of multiple daily shipments of the same waste stream, a single Work Order Number can be assigned on a daily basis. The Work Order is a one (1) page document which may be used for a variety of functions, including:

- Scheduling receipt of a waste shipment;
- Exchange, placement or removal of waste containers;
- Inspecting a waste shipment manifest for completeness and errors
- Recording the disposal location of the waste;
- Noting that the waste data was entered on the computer and the individual responsible for entering the data;
- Noting that the customer was billed for disposal and/or other services, and the amounts invoiced;
- Noting the initial inspection of the waste and containers prior to unloading, and the individual performing the inspection;
- Verifying that sampling and analysis of the waste was performed, and the individual who conducted it;
- Noting any unusual occurrences, and recording actions taken;
- Identifying any special safety or disposal requirements;

2.3 Work Order Supplement

The Work Order Supplement is a one (1) page document used to record or verify functions such as:

- Weighing in and out of waste transport vehicles;
- Inspection of vehicle and waste during unloading;
- Sampling of waste and type of samples to be obtained;
- Cell or storage area in which the waste is to be placed;
- Cell coordinates for waste location (for disposal operations);
- Disposal of waste
- Decontamination of waste transport vehicle.

2.4 Waste Stream Approval

Prior to scheduling a waste shipment, the facility will verify by accessing the information system that the waste stream has been approved for acceptance. A copy of the approval page and waste characteristics will be printed and attached to the Work Order. This will assist in preventing the accidental scheduling of expired or unapproved waste streams, and allows the Compliance Manager and/or Receiving Technician review of the waste properties prior to arrival.

2.5 Uniform Hazardous Waste Manifest

The Uniform Hazardous Waste Manifest is required by federal and state regulations to accompany waste shipments arriving or leaving the facility. The Receiving Technician (or designee) will thoroughly review the manifest for proper completion. Information on incoming manifests will be compared with the waste characteristics printout prior to accepting the waste.

2.6 PCB Log Book

The PCB log book provides a method of tracking the off-site destruction of PCB material. The PCB Log Book will include the Work Order, quantity of solids generated on each Work Order, the date the material

material is shipped off-site for destruction, outgoing manifest number, and name of the off-site destruction facility. The Work Order Number will be recorded in the space provided for each shipment.

2.7 Waste Produce Questionnaire Form

The customer/generator will provide the technical review staff with a completed Waste Product Questionnaire form (commonly referred to as a profile) for review and approval prior to shipment to the facility. A copy of the profile completed by the customer/generator must be attached to the manifest received with the waste shipment. Upon receipt of the shipment, the profile approved by the technical review staff will be compared to the copy attached to the manifest to ensure that no unapproved waste is received

2.8 Unusual Occurrences Report

The Unusual Occurrences Report form is used to describe any unusual occurrence or problems which may occur at the facility and to document any follow-up actions. The completed report will be attached to the Work Order package.

2.9 Chain-of Custody Record/Laboratory Request

All waste stream samples shipped to an off-site laboratory for further verification analysis will be accompanied by the Chain of Custody. This triplicate form provides proper documentation concerning the sampling and shipment of waste samples to the laboratory. The original copy will be returned to the facility laboratory, for inclusion into the Work Order package and a copy will be retained at the facility laboratory.

2.10 Record of PCB Building Operations

This form will be used to record the information necessary for accurate recordkeeping, as required by state and federal regulations. The form is designed to record the required information by Work Order Number, and can be used when more than one waste stream number arrives with the shipment. Upon completion, the form will be incorporated to the Work Order package.

2.11 Work Order PCB Destruction Certification Form

This form provides documentation to the Work Order Log coordinator that the PCB waste shipped off-site has been destroyed. This form will be completed by the individual responsible for the draining and flushing operation. Upon receipt of the Certificate of Destruction from the PCB destruction facility, one form will be completed for all applicable Work Orders. A copy of the Certificate of Destruction will be attached to the Work Order package.

3.0 OPERATING RECORD

The facility will maintain or have available the following information as part of the operating record:

- Description of each hazardous waste received at the facility, quantity, method(s) and date(s) of treatment, storage, or disposal. The waste description will include all applicable EPA hazardous waste numbers.

- Work Order System paperwork - The Work Order System is the mechanism employed by USEN to document the movement of each hazardous waste shipment received at the facility and its final disposition.

- Map of the facility identifying the location and size of each disposal cell included. The location of waste within the disposal unit will be described with respect to permanently surveyed benchmarks

- Records and results of waste characterization and analysis required, as described in the Waste Analysis Plan.

- Summary reports and details of incidents that require implementation of the Contingency Plan. Implementation of the Contingency Plan is documented using the Unusual Occurrence Report.

- Generator notification/certification forms, as required by 40 CFR 268, on every Land Disposal Restricted (LDR) waste stream accepted at the facility for treatment, storage, or disposal. These notification forms will be maintained at the facility for a minimum of five (5) years after waste receipt.

- Copies of 40 CFR 268 notification/certification forms for every on-site generated waste subject to the Land Disposal Restrictions. Copies of these notifications will be maintained as part of the operating record for at least five (5) years.

- All signed manifests generated or received at the facility during the calendar year.

- All Certificates of Disposal that have been generated or received by the facility during the calendar year. For each shipment of manifested RCRA or PCB waste that is received at USEN a Certificate of Disposal (CD) will be prepared. The information included on the CD will include the identify of the disposal facility, the identity of the waste affected by the CD including reference to the manifest it was shipped on, dates of disposal and disposal process used and lastly a certification statement.

- Records and results of facility inspections, as described in the Facility Inspection Plan.

- Training records on current and former employees, as described in the Training Plan. Records on current employees will be maintained until closure of the facility.

- For all hazardous debris treated by any extraction technology that does not exhibit any hazardous waste characteristic and is therefore excluded from further regulation under the RCRA program, the facility will maintain documentation of all inspections, evaluations, and analysis employed in determining compliance with the treatment standards, along with any data or information obtained during treatment that identifies key operating parameters of the treatment unit. A signed certification of compliance with the treatment standards will also be prepared

be prepared and placed in the operating record for each shipment of treated debris.

- Records of the precautions observed to prevent violent reactions and/or extreme heat generation, toxic mists, fumes or gases while managing ignitable, reactive or potentially incompatible waste streams.

- Monitoring, testing and analytical data obtained in compliance with 40 CFR 264, Subpart F requirements, as described in the Groundwater Monitoring Plan.

- Notices to generators that the facility has appropriate permits required to accept their waste for treatment, storage and/or disposal.

- Current closure and post closure cost estimates as required by 40 CFR 264.144.

- Annual certification that the proposed method of treatment, storage, and disposal is the practicable method currently available that minimizes present and future threat to human health or safety, and to the environment.

- Annual certification that the facility has a program in place to reduce the volume and toxicity of on-site generated hazardous wastes to an economically practicable degree.

- A copy of the procedure used to determine that containers with a capacity of 119 gallons or greater which do not meet applicable DOT regulations as specified in 264.1086(f), are not managing hazardous waste in light service. This procedure shall be written prior to any waste being handled in a container as described above.

- For waste streams, managed in a container subject to 40 CFR 264 Subpart CC regulations, which do not require the use of air emission control equipment, documentation shall be recorded and maintained in the operating record that includes the information that was used by the Permittee for each waste determination (e.g. test or certification by the generator). If analysis results for waste samples are used for the waste determination, then the Permittee shall record the date, time, and location that each waste sample is collected in accordance with applicable requirements in 40 CFR 264.1083.

- For containers used at the facility to manage hazardous wastes subject to 40 CFR 264 Subpart CC regulations, sufficient information shall be provided to describe:

  (1) A facility identification number for the container or group of containers;
  (2) The purpose and placement of this container, or group of containers, in the management train of the hazardous waste;
  (3) The procedures used to ultimately dispose of the hazardous waste handled in the containers.

4.0 REPORTING MECHANISMS

Attachment 1 includes a summary table of reports submitted to either NDEP or EPA.

4.1 Monthly Reports

A chemical and PCB waste disposal activity report will be prepared and submitted to the Nevada Division of Environmental Protection on the last working day of each month covering activities during the previous month. The report will include the following information:

- total quantity and type of chemical and PCB waste disposed during the month (in tons and cubic feet)

- waste classification and corresponding fee category

- remaining capacity left in the active cell

- name and address of each generator

- a description of any unusual events related to chemical waste disposal which occurred during the month

4.2 Annual Reports and Logs

Annual RCRA Report

By March 1st of every year, the facility will submit an annual report describing facility activities during the previous calendar year. This report will include the following information:

- EPA identification number of each hazardous waste generator from which the facility received hazardous waste,
- a description and quantity of all waste received (in tons and cubic feet),
- the method of treatment, storage or disposal,
- unusual occurrence reports and summaries of their quarterly reviews,
- the most recent closure and post-closure cost estimate (including complete cost itemization), and
- signed certification.

Annual PCB Document Log

By July 1st of every year, the facility will submit an annual PCB

document log for the previous calendar year. This report will include the following information from 40 CFR § 761.180(b):

- Name, address and EPA ID number of the facility
- For each manifest generated or received by the facility, the unique manifest number and the name/address of the facility that generated the manifest
- For bulk PCB waste, its weight in kilograms, date it was placed into container or removed from service, received date, date it was placed in transport for off-site disposal (if applicable), and the date of disposal (if known).
- For non-bulk PCB material, the serial number or other unique identifier of each PCB article or container, the weight in kilograms, out of service date, received date, date it was placed in transport for off-site disposal (if applicable) and the date of disposal (if known).

Annual PCB Report

By July 15th of every year, the facility will submit an annual PCB report for the previous calendar year. This report will include the following information from 40 CFR § 761.180(b)(3):

- The name, address, and EPA ID number of the facility covered by the annual report.
- A list of the numbers of all signed manifests of PCB waste initiated or received by the facility.
- The total weight in kilograms of bulk PCB waste, PCB waste in transformers, PCB waste in capacitors, PCB waste in PCB articles and PCB waste in PCB containers, in storage at the facility at the beginning of the year, received, transferred and disposed of at the facility during the calendar year.
- The total number of PCB transformers, PCB capacitors, PCB articles, and PCB containers, in storage at the facility at the beginning of the year, received, transferred and disposed of at the facility during the calendar year.

- The total weight in kilograms of bulk PCB waste, PCB waste in transformers, PCB waste in capacitors, PCB waste in PCB articles and PCB waste in PCB containers, in storage at the facility at the end of the year.
- The total number of PCB transformers, PCB capacitors, PCB articles, and PCB containers, in storage at the facility at the end of the year.

4.3 Manifest Discrepancy Reports

A manifest discrepancy report will be submitted to the NDEP Administrator (EPA Region IX if PCBs) in the event that a manifest discrepancy is not resolved within fifteen (15) days. The report will describe the discrepancy and attempts to reconcile it, and will include a copy of the manifest or shipping paper at issue.

4.4 Un-manifested Waste Report

In the event that a hazardous waste shipment be accepted without an accompanying manifest or shipping papers, an un-manifested waste report will be submitted to the NDEP Administrator within fifteen (15) days after receiving the waste. The report will include the facility and transporter information (EPA identification number, address), a description and quantity of un-manifested waste received, the method of treatment, storage or disposal, a brief explanation of why the waste was un-manifested, and required certification.

4.5 Exception Reports

Manifest Exception Reports

USEN will submit an Exception Report to the NDEP Administrator (and EPA Region IX if PCBs) if a copy of the manifest from the designated off-site facility (confirming acceptance of an outgoing shipment of

hazardous waste) is not received within forty-five (45) days from the date the waste was accepted by the initial transporter. The report will include:

- a legible copy of the manifest for which no confirmation of delivery has been provided, with

- a cover letter signed by an authorized company representative explaining the efforts taken to locate the waste, and the results of such efforts.

PCB One Year Exception Report

USEN will submit a 'One-Year Exception Report' to EPA Region IX no later than 45 days from the end of the 1-year storage for disposal date when the following occurs:

- USEN receives PCBs or PCB Items on a date more than 9 months from the date the PCBs or PCB items were removed from service, as indicated on the manifest or continuation sheet.
- Because of contractual or commitments or other factors affecting the facilities disposal capacity, the disposer of PCB waste could not dispose of the affected PCBs or PCB Items within 1 year of the date of removal from service for disposal.

Per 40 CFR §761.215 (e) the exception reports will include:

- A legible copy of any manifest or other relevant written communication.
- A cover letter signed by the submitter or authorized representative
- The date(s) when the PCBs or PCB items were removed from service.
- The date(s) when the PCBs or PCB items were received.
- The date(s) when the affected PCBs or PCB items were transferred to the disposal facility,

- The identity of the transporters, commercial storers or disposers known to be involved with the transaction.
- The reason, if known, for the delay in bringing about the disposal of the affected PCBs or PCB items within one year from the out of service date.

4.6 Emergency Occurrences Reports

A report will be submitted to the NDEP within fifteen (15) days of any release, fire or explosion which required implementation of the Contingency Plan, providing a detailed description of the incident, including:

- name, address and telephone number of the facility operator
- date, time and type of incident
- name and quantity of materials involved
- the extent of injuries, if any
- an assessment of the actual or potential hazards to human health or the environment
- estimated quantity and disposition of recovered materials that resulted from the incident.

USEN will orally report to the NDEP Administrator any incident requiring implementation of the Contingency Plan. The Nevada Division of Emergency Management and the National Response Center will be notified of any incident involving a release to the environment of hazardous waste, pollutant or contaminant in a quantity equal to, or greater than the reportable quantity specified by 40 CFR 302.

The oral reports described above will be provided as soon as possible after becoming aware of the release, but no later than the end of the first working day.

If the release originated from a tank system or secondary containment, USEN will follow-up with a written report to the NDEP Administrator within thirty (30) days of detection of the release, describing:

- likely route of migration of the waste
- characteristics of the surrounding soil (soil composition, geology, hydrogeology, climate, etc.)
- results of any monitoring or sampling conducted in connection with the release (if available)
- proximity to downgradient drinking water, surface water, and populated areas
- descriptions of response actions taken or planned.

If the release originates from the Containment Building, the Administrator will be notified within seven (7) days after the discovery. A follow-up written plan will be submitted within 14 days describing the steps taken to repair the unit and the schedule for accomplishing the work.

5.0 RECORDS RETENTION

In addition to the records outlined in Section 3 the following records will be maintained at the facility:

- All documents, correspondence and data that have been provided to the operator of the facility by any State or local government agency that pertain to the storage of disposal of PCBs and PCB items at the facility.
- All documents, correspondence and data that have been provided by the operator of the facility to any State or local government agency that pertain to the storage of disposal of PCBs and PCB items at the facility.
- Any applications and related correspondence sent by the operator of the facility to any local, State or Federal authorities in regard to waste water discharge permits, solid waste permits,

building permits, or other permits or authorizations such as those required by 40 CFR §761.70(d) and §761.75(c).

ATTACHMENT 1

US Ecology Reporting Summary Table

Date of Report	Report Name	Description	Agency
Monthly	PCB Disposal Operations Report	Monthly summary of PCB activities	EPA
March 1	Tier II Chemical Reporting Report	On-site chemical inventory. Used for emergency planning purposes.	NDEP / Local Emergency Planning Commitee / State Emergency Planning Committee / State Fire Marshal
March 1	Annual Report	Per 40 CFR 264.71. RCRA Permit Requirement	NDEP / EPA
March 1	Actual Production / Emission Report	Includes the actual emission emitted from the facility	NDEP
March 31 & September 30	Environmental Monitor Report	Includes summary of groundwater monitoring, leachate collection and SVE well activities	NDEP / EPA
May 1	Annual Closure/Post Closure Inflation Cost Adjustment	Annual update of the Closure/Post Closure estimate	NDEP
July 1	Toxic Release Inventory Report (TRI)	Per 313 of the Emergency Planning and Community Right to Know Act. Inventory of TRI chemicals disposed at the facility	EPA / TRI Data Response Center / Nevada Emergency Response Center
July 15	Annual PCB Report	Per 40 CFR 761.180 (b)	EPA
As Needed	Manifest Discrepancy Reports	Per 40 CFR 761.210. If a manifest discrpency can not be resloved in 15 days this report must be filed.	NDEP or EPA (if PCBs)
As Needed	PCB One Year Exception Report	Per 40 CFR 761.215. If PCB waste was recieved at the facility after 1 year of being taken out of service this report	EPA