

ATTACHMENT 9 MANIFESTING AND RECORD RETENTION

9.1 Manifesting

All Safety-Kleen employees are trained in the proper completion of the hazardous waste manifest. The hazardous waste conditionally exempt small quantity generators (CESQGs), small quantity generators (SQGs), and large quantity generators (LQGs) have been identified by computer based amount of waste picked up per service, the number of services per year, and any other information supplied by the generator. The procedures for manifesting from Safety-Kleen customers to the service center are outlined below:

1. Parts Washer Solvent And Immersion Cleaner
 - CESQG – a preprinted document is used (see example in Appendix C-12 [“Sample Placement Form”]).
 - SQG and LQG – a Uniform Hazardous Waste Manifest is used. See Appendix C-13 (‘‘Example of Uniform Hazardous Waste Manifest’’) for an example.
2. Paint and Related Waste – a Uniform Hazardous Waste Manifest is used.
3. Dry Cleaning Waste – a Uniform Hazardous Waste Manifest is used.

The procedure for manifesting from the service center to the recycle center is outlined below:

1. Parts Washer Solvent and Immersion Cleaner - a Uniform Hazardous Waste Manifest is used.
2. Paint and related wastes – Waste collected from customers who generate less than 100 kg/month are accumulated at the service center, and the label is marked as being accumulated from CESQGs. The paint wastes are recycled in California; thus, the California manifest is used with Safety-Kleen as the generator.
3. Dry Cleaning Wastes – A Texas Manifest is used to transport the wastes to Denton, Texas, Recycle Center
4. Antifreeze Wastes – A Uniform Hazardous Waste Manifest is used

9.2 Manifest Submittals and Reports

For off-site shipments, one copy of the manifest will be submitted to ADEQ no later than thirty (30) days following the end of the month of the shipment (A.A.C. R18-8-264.I).

Unmanifested waste reports as required by AAC R18-8-264.A (40 CFR 264.76) will be submitted to ADEQ within fifteen (15) days of receipt of unmanifested waste.

All additional reports required by AAC R18-8-264.A (40 CFR 264.77) will be submitted to ADEQ as required.

Safety-Kleen will submit to the ADEQ an annual report by March 1 for the preceding calendar year, containing all information contained in AAC R18-8-264.H.

9.3 Record Retention

All records required under AAC R18-8-264.A (40 CFR 264.73(b)) will be retained onsite for three (3) years, or indefinitely, as required. By letter dated September 20, 2011 from the Arizona Department of Environmental Quality, Safety-Kleen is approved to retain manifests electronically. All specific assurances identified in this letter (ref: HWP-EX2521) must be adhered to. A copy of the September 20, 2011 letter is located in Appendix B.