

ATTACHMENT I – RECORDKEEPING AND REPORTING

I-1 OPERATING RECORD

As a permitted facility that manages hazardous waste, Heritage maintains a facility operating record. Table I-1 summarizes the required elements of the operating record and the periods required for record retention. Table I-1 includes recordkeeping requirements for hazardous wastes received from off site and subsequently managed at the Heritage facility, in addition to hazardous wastes generated by Heritage.

The number and types of data required as part of the operating record are extensive. The Heritage facility manages operating record information in several different ways. Documentation required by the operating record is stored by the facility in hard copy files, microfilmed, stored electronically on a computer system, or stored on magnetic or similar data storage media. Records may also be maintained at a commercial records retention facility.

Table I-1
Recordkeeping Requirements
Heritage Environmental Services, LLC
Coolidge, Arizona

Operating Record for Treatment, Storage, and Disposal Facility (TSD)

Record	Retention Period	Regulatory Reference
Description and the quantity of each hazardous waste received and the method and date(s)	Until closure of the facility	40 CFR 264, Appendix I
The location of each hazardous waste within the facility and the quantity at each location, including cross references to manifest document numbers if accompanied by a manifest	Until closure of the facility	
Records documenting personnel training that include job titles for each position, written job descriptions, a description of the type and amount of introductory and continuing training required, and records documenting that the training and experience required have been given to and have been completed by facility personnel	Until closure of the facility for current employees. 3 years from the date the employee last worked at the facility for former employees.	40 CFR 264.16
Results of general waste analysis	3 years from date of analysis	40 CFR 264.13
Results of waste analysis for ignitable, reactive, and incompatible wastes	3 years from date of analysis	40 CFR 264.17
Results of analysis for organic wastes	3 years from date of analysis	40 CFR 264.1063 (Subpart BB)
Waste analysis and recordkeeping	3 years from date of analysis	40 CFR 268.7
Summary reports and details of all incidents that require implementation of the facility Contingency Plan	Until closure of the facility	40 CFR 264.56(j)
Records and results of inspections	3 years from date of inspection	40 CFR 264.15(d)
Notice to generators	3 years from the date the waste accepted for	40 CFR 264.12(b)
Closure cost estimate	Current cost estimate until closure of the facility	40 CFR 264.142
A certification no less than annually that the permittee has a program in place to reduce the volume and toxicity of hazardous waste that the permittee generates to the degree determined economically practicable; and the proposed method of storage is the practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment	Current certification until closure of facility	
Copies of the notice(s) and the certification and demonstration, if applicable, required by the generator or the owner or operator for storage of restricted waste	3 years from date of delivery	40 CFR 268.7
Hazardous waste manifests for shipments received and accepted by the facility	3 years from date of delivery	

Operating Record for TSD as Generator

Record	Retention Period	Regulatory Reference
Uniform hazardous waste manifests	3 years from the date the waste was accepted by the initial transporter	40 CFR 262.40(a)
Copies of annual hazardous waste reports	3 years from the due date of the report	40 CFR 262.40(b)
Records of test results, waste analyses, or other determinations	3 years from the date the waste was last sent to off site treatment, storage, or disposal	40 CFR 262.11
Copies of notices, certifications, restricted waste determinations whether by knowledge of the waste, testing, or supporting data and other documentation	3 years from the date the waste was last sent to off site treatment, storage, or disposal	40 CFR 268.7(a)(5)
Notification of intent to export hazardous waste	3 years from the date the waste was accepted by the initial transporter	40 CFR 262.57(a)(1)
Copy of each EPA Acknowledgement of Consent to export hazardous waste	3 years from the date the waste was accepted by the initial transporter	40 CFR 262.57(a)(2)
Copy of each confirmation of delivery of hazardous waste from the consignee of an exported shipment of hazardous waste	3 years from the date the waste was accepted by the initial transporter	40 CFR 262.57(a)(3)
Copy of each annual report prepared for the exports of hazardous waste	3 years from the due date of the report	40 CFR 262.57(a)(4)

Operating Record Documents of Filter Cake for Metals Reclamation Operations

Record	Retention Period	Regulatory Reference
Description and the quantity of each shipment of Filter Cake for metals reclamation and the method and date(s) of its storage	Until closure of the facility	40 CFR 264, Appendix I
The location of each container of Filter Cake designated for reclamation, quantity at each location, including cross references to manifest document numbers if accompanied by a manifest	Until closure of the facility	
Records documenting personnel training for operation of Filter Cake for metals reclamation	Until closure of the facility for current employees. 3 years from the date the employee last worked at the facility for former employees.	40 CFR 264.16
Results of waste analysis including pre-acceptance analysis that includes fingerprint testing described in Attachment C - Solids (Filter Cake) Blending for Offsite Metals Reclamation including pH, appearance, noticeable odor, oxidizer screen, organic vapor screen, paint filter liquids, sulfide screen, and cyanide screen as well as testing for total cyanide and metals listed on Table 1 of 40 CFR Part 261.24(b) prior to blending.	3 years from date of analysis	40 CFR 264.13, 40 CFR Part 262.11
Summary reports and details of all incidents that require implementation of the facility Contingency Plan for F006 Blending Operation	3 years from date of analysis	40 CFR 264.17
Records and results of inspections in container storage area where Filter Cake blending for metal reclamation occurs. This includes container inspection, storm water management, and container storage area inspections	3 years from date of inspection	40 CFR 264.15(d)
Hazardous waste manifests for shipments of Filter Cake for metal reclamation received and accepted by the facility	3 years from date received	
Uniform hazardous waste manifests of Filter Cake for metal reclamation shipped off site	3 years from the date the waste was accepted by the initial transporter	40 CFR 262.40(a)
Copies of notices, certifications, restricted waste determinations whether by knowledge of the waste, testing, or supporting data and other documentation of Filter Cake for metals reclamation	3 years from the date the waste was last sent to off-site treatment, storage, or disposal	40 CFR 268.7(a)(5)

Note: The retention period for all records required under 40 CFR Parts 262, 264, and 268 are extended automatically during the course of any unresolved enforcement action regarding the facility or as requested by the Director.