

MODULE B8

RECORDKEEPING PROCEDURES

This section summarizes the recordkeeping procedures that are implemented by Dow Silicones Corporation (Dow Silicones) as required under 40 CFR 264.73 and Michigan Act 451 Rule 299.9609. All records are maintained by Dow Silicones for a minimum of three years as specified by the regulations.

List of Tables

Table B8-1 Facility Records and Retention Periods

B8.A INTRODUCTION

All records and plans required by 40 CFR 264.73 and Michigan Act 451, Rule 299.9609, as well as any other records required under the facility's license are retained at the facility and are available, at reasonable times, for inspection by designated representatives of the U.S. EPA and Department of Environment, Great Lakes and Energy (EGLE). All records are retained for a period of at least three years or longer as specified by the regulations.

The records that are maintained at this facility, with the minimum record retention period for each, are shown in Table B8-1, located at the end of this section. The retention periods for all records listed are automatically extended during the course of any unresolved enforcement action regarding this facility. The minimum retention periods will also be extended at the request of the Director of EGLE or the Regional Administrator of U.S. EPA, Region 5. A copy of facility records showing waste disposal locations and quantities in the hazardous waste landfill will be submitted to the Director of EGLE, the Regional Administrator of U.S. EPA, Region 5, and to the local land use authority at the time of closure of this facility.

**Table B8-1
Facility Records and Retention Periods
Dow Silicones Corporation, Midland, Michigan**

| Record Type | Retention Period | Reference |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|-----------------------|
| <p>1. Description of wastes received, treated, stored and disposed, including:</p> <ul style="list-style-type: none"> • Common name of waste • EPA waste codes • Physical form of waste • Generating process (for unlisted wastes) • Estimated or manifested weight, or volume and density • Dates placed in and removed from storage • Date of disposal (if applicable) • Location and quantity of each waste placed in the landfill • Location and quantity of each waste in storage • Manifest numbers for all wastes received or shipped using a manifest | Life of facility | 40 CFR 264 Appendix I |
| <p>2. Waste characterizations: Records and results of waste analyses and waste determinations performed to meet requirements of 264.13, 264.17, 264.314 9 (landfill), 264.1063 (Subpart BB), 264.1083 (Subpart CC), 268.7 (LDR)</p> | Life of facility | 40 CFR 264.73(b)(3) |
| <p>3. Facility personnel training records, including:</p> <ul style="list-style-type: none"> • The job title for each job related to hazardous waste management; • The name of each facility employee filling each job related to hazardous waste management; • Date of hire or transfer into the licensed facility; • A written job description for each facility job related to hazardous waste management; • A written description of the type and amount of on-site initial and refresher training provided to facility personnel involved in hazardous waste handling and facility management; • A written description of the type and amount of off-site training related to hazardous waste management received by each employee; • Documentation that the required training, both classroom and on the job, has been given to, and completed by, facility personnel. | 3 years after cessation of employment | 40 CFR 264.16(d) |

**Table B8-1
Facility Records and Retention Periods – continued
Dow Silicones Corporation, Midland, Michigan**

| Record Type | Retention Period | Reference |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|---------------------------|
| 4. For units subject to Subpart BB requirements: Identification number of the monitored equipment; <ul style="list-style-type: none"> • The date the monitoring was performed; • The background concentration measured during each test; • The maximum instrument reading measured during each monitoring test; • The monitoring schedule under which valves subject to the alternative work practices schedules are being monitored; • For those valves being monitored under the alternative work practices schedules, the percentage of valves found to be leaking during each monitoring period. | Life of facility | 40 CFR 264.1064 |
| 5. Records of each determination of vapor pressure of wastes stored in Level 1 tanks | 3 years or until superseded, whichever is greater | 40 CFR 264.1089(b)(2)(i) |
| 6. Waste determinations documenting exemption from Subpart CC requirements based on organic concentration | 3 years or until superseded, whichever is greater | 40 CFR 264.1089(f)(1) |
| 7. Air emission control equipment design documentation for hazardous waste storage tanks | Until equipment is replaced or removed from service | 40 CFR 264.1089(a) |
| 8. Tank identification numbers | Until equipment is replaced or removed from service or 3 years, whichever is greater | 40 CFR 264.1089(b) |
| 9. Tank cover inspection logs | 3 years | 40 CFR 264.1089(B)(1)(ii) |
| 10. All closure and post-closure cost estimates | Life of facility | 40 CFR 264.73(b)(8) |
| 11. Annual waste minimization certification | Life of facility | 40 CFR 264.73(b)(9) |
| 12. Land disposal restriction notifications to off-site TSD facilities | 3 years | 40 CFR 268.7 |
| 13. Facility inspection records | 3 years | 40 CFR 264.73(b)(5) |
| 14. Summary reports and details of all incidents requiring implementation of the Contingency Plan | Life of facility | 40 CFR 264.73(b)(4) |
| 15. Monitoring, testing, and analytical data and corrective action information | Life of facility | 40 CFR 264.73(b)(6) |