

SECTION M

OPERATING RECORDS AND RECORD KEEPING PROCEDURES

R 299.9504, R 299.9609, R 299.9610 and 40 CFR 264.71 through 264.77 and
264 Appendix I

OPERATING RECORDS AND RECORD KEEPING PROCEDURES

TABLE OF CONTENTS

M-1	Introduction.....	1
M2	Biennial Report.....	1
M-3	Environmental Monitoring Reporting	1
M-4	Incident Reporting and Recordkeeping	1
M-4a	Immediate Notification.....	1
M-4b	Written Notification	2
M-5	Manifest System	2
M-6	Manifest Discrepancies	3
M-7	Land Disposal Restrictions Recordkeeping Requirements.....	3
M-8	Unmanifested Waste Reports.....	3
M-9	Modifications of Recordkeeping Forms	4

TABLE

The table listed below and referenced in this section is found in the Tables Tab of this application

Table M- 1: Manifest Distribution

APPENDICES

The Appendices listed below and referenced in this section are found in the Appendices Tab of this application

Appendix M- 1: Protocol for Evaluating the UHW Manifest

Appendix M- 2: Land Disposal Restrictions

M-1 Introduction

(40 CFR 264.73(a) and 264.74(a))

EQD maintains accurate records pertaining to all hazardous waste accepted, treated and stored at the facility. These records will be used to document and manage operations at the facility and to maintain compliance with 40 CFR 264.73, Part 264 Appendix I and R 299.9609 and R 299.9610. These records will be retained at the facility located at 1923 Frederick Street, Detroit Michigan at all times, and will be available upon request at reasonable times for inspection by designated representatives of the USEPA and MDEQ. Note that records are retained electronically or as a hard copy. All company records are retained for a period of at least three years or longer as specified by the regulations. These records will be maintained in the operating record until closure of the facility as per the information required by the provisions of 40 CFR 264.73 and Part 264 Appendix I.

Monthly operating reports (MOR) will be submitted to the Michigan Department of Environmental Quality (MDEQ) Division Chief on the MOR form.

EQD will submit a copy of all manifests to the MDEQ within 10 days after the end of each month.

M-2 Biennial Report

(40 CFR 264.75 and R 299.9610(1))

EQD will prepare and submit a single copy of a summary report to the Director of the MDEQ and the USEPA on a biennial basis by March 1 of each even numbered year for the prior year. The Biennial Report will be submitted on U.S. EPA Form 8700-13B in accordance with the requirements of R 299.9610, R 299.9521(1)(a) and 40 CFR 270.30(l)(99).

M-3 Environmental Monitoring Reporting

EQD will submit the results of all environmental monitoring required by this permit as well as the results of any non-permit required sampling or analysis in an Environmental Monitoring Report. The report will be submitted to the MDEQ Division Chief within 60 days after sample collection. EQD will submit air monitoring results to the MDEQ Air Quality Division in accordance with R 299.9521(1)(a), R 299.9521(3)(b) and 40 CFR 270.14(l)(4).

M-4 Incident Reporting and Recordkeeping

Refer to **Section G, Contingency Plan** for a detailed description of the incident reporting and notification procedures that will be followed by EQD following any incident that could threaten human health or the environment.

M-4a Immediate Notification

EQD will notify Michigan Department of Environmental Quality as soon as EQD is aware of an incident that could threaten human health or the environment. EQD will immediately provide verbal notification to the Division Chief of MDEQ and the Pollution

Emergency Alerting System (PEAS) as applicable. The notification will include the following

- Information concerning the incident (fire, explosion, release, or discharge of any hazardous waste or hazardous waste constituent that could threaten human health or the environment, has reached surface water or groundwater, or may threaten public drinking water supplies or the environment.
- A description of the incident and the cause of the incident, if known, in accordance with R 299.9607(2)(a) to (i)

M-4b ***Written Notification***

EQD will provide a written report within five days after EQD is aware of an incident. The written “5-day Report” will be submitted as required. The written report will describe the exact time, date, and duration of the incident, and provide a detailed description of the type of incident (fire, explosion, release or discharge of hazardous waste or hazardous waste constituent). The report will also indicate whether or not EQD has corrected any non-compliance. If the non-compliance has not been corrected, the report will provide the actions needed to reduce, eliminate, and prevent a recurrence of the incident and an anticipated date that the non-compliance will be corrected. The “5-Day Report” will also contain information supporting any EQD contention that the incident did not endanger human health or the environment.

M-5 **Manifest System**

(40 CFR 264.71)

EQD receives hazardous waste accompanied by a manifest. Manifest copy distribution is found in **Table M-1**. EQD uses the procedure found in **Appendix M-1** for evaluating the Manifest for received wastes. When waste is received, the operator must:

1. Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received.
2. Note any significant discrepancies in the manifest on each copy of the form.
3. Immediately give the transporter at least one copy of the signed manifest.
4. Within 30 days after the delivery, EQD will send a copy of the manifest to the generator; and
5. Retain a copy of each manifest for at least three (3) years from the date of delivery at EQD.

M-6 Manifest Discrepancies

(40 CFR 264.72)

EQD Waste Acceptance personnel will check each incoming shipment of hazardous waste against the manifest for significant discrepancies. These significant discrepancies would be:

1. For bulk waste, variation of more than 10% in weight from that stated on the manifest.
2. The discovery of a discrepancy in the type of waste reported in the manifest.

Upon discovering a significant manifest discrepancy, EQD will contact the waste generator or transporter (e.g., with telephone conversation) to attempt to reconcile the discrepancy within 15 days of acceptance of the waste shipment. If the discrepancy cannot be resolved with the hazardous waste generator, EQD will submit a written report to the USEPA and the MDEQ describing the discrepancy and their attempt to reconcile it. EQD will attach to this report a copy of the manifest of issue.

M-7 Land Disposal Restrictions Recordkeeping Requirements

All facilities that receive or generate restricted wastes are subject to land disposal restriction record keeping requirements. Pursuant to 40 CFR 268.7(2) generators are required to provide EQD with a one-time written notice that describes the appropriate treatment standard set forth in 40 CFR 268 Subpart D and any applicable prohibition levels set forth in 40 CFR 268.32 or RCRA 3004(d). Thereafter a copy of the written notice must be maintained at the generators file. A description of the Land Disposal Restrictions is found in **Appendix M-2**.

For generated process wastes that will be managed at an off-site disposal facility, EQD will comply with the same generator notice and certification requirements.

The facility will maintain copies of all generator notices and certification and copies of notices and certification sent by EQD to off-site disposal facilities for a minimum of five years.

M-8 Unmanifested Waste Reports

(R 299.9610(2)40 CFR 264.76)

EQD will not knowingly accept hazardous wastes at the facility without an accompanying manifest. However, if the EQD facility accepts unmanifested waste from an off-site source for storage or treatment, and if the waste is not excluded from the manifest requirement by R 299.9205, then an "Unmanifested Waste Report" will be prepared and a single copy shall be submitted to MDEQ within 15 days after receiving the unmanifested waste. The Unmanifested Waste Report shall include all the following information:

1. The U.S. EPA identification number, name and address of the facility;
2. The date the facility received the unmanifested waste;

3. The U.S. EPQ identification number, name and address of the generator and transporter, if available;
4. A description and the quantity of each unmanifested hazardous waste that the facility received;
5. The method of storage and treatment for each unmanifested hazardous waste received;
6. The certification signed by the owner or operator, or their representative, of the facility; and
7. A brief explanation of why the waste was unmanifested, if known.

M-9 Modifications of Recordkeeping Forms

EQD provides reports and keeps operating records on a variety of forms. Forms that have been provided as attachments to this application may require modification to change the format, update references and information, add information or change certification or notification information in accordance with Part 111 of Act 451 and its rules and RCRA and its regulations. EQD will submit any such modifications to these forms to the Division Chief. If the Division Chief does not reject or require revision of the modified form(s) within 14 days, EQD will implement the use of the modified form(s), and incorporate the modified form(s) in place of the existing form(s).

Appendix M- 1: Protocol for Evaluating the UHW Manifest

Appendix M- 2: Land Disposal Restrictions

Table M- 1: Manifest Distribution