

PERMIT ATTACHMENT I MANIFESTING, REPORTING AND RECORD KEEPING

MANIFESTING

Rinchem Company, Inc. (RCI) shall include a hazardous waste manifest whenever hazardous waste is shipped off-site from the container storage facility (CSF) to treatment, storage and/or disposal facilities. All specific manifest requirements shall be completed in accordance with all applicable requirements of 20.4.1.500 NMAC, incorporating 40 CFR §264.70 through §264.77.

Upon RCI receipt of hazardous waste accompanied by a manifest, the following steps shall be taken:

- Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received.
- If there are discrepancies with an off-site manifest, RCI shall not accept the waste and shall contact by telephone the originator of the manifest.
- Depending on the discrepancy, RCI shall request a detailed inventory of the waste, a new manifest and order additional analytical testing.
- If the discrepancy is not resolved within 15 calendar days after receiving the waste (if RCI decides to accept the waste), RCI shall submit to the Secretary (NMED) a letter describing the discrepancy and the attempts to reconcile it and a copy of the manifest or shipping papers at issue.
- Once the waste is received at the CSF, the manifest shall be terminated and the original mailed back to the off-site generator.
- Within 30 days after receiving off-site waste, RCI shall send a copy of the manifest to the generator.

RCI shall file the treatment, storage, and disposal facility (TSDF) copy and retain a copy of each manifest at the CSF for at least three years from the date of delivery. A specific location shall be assigned for storing the waste based on its characteristics. This storage location shall be entered into the RCI accounting computer system and hazardous waste log. Movement of hazardous waste within RCI does not routinely occur. However, in the event an internal move is required, the new location shall be entered into the accounting system. The wastes shall be shipped on a new manifest to the designated disposal site. RCI shall maintain an operating record at the CSF. In the operating record the following shall be maintained for the life of the CSF unless otherwise noted:

- A description and quantity of each waste received and the method and dates of storage. The location of each hazardous within the CSF and the quantity of waste at the location.

- The information in the operating record shall cross-reference the specific manifest document numbers.
- Records and results of waste analysis and waste determinations shall be maintained in the operating record at the.
- Summary reports and details of incidents that require implementing the contingency plan.
- Monitoring, testing or analytical data and any corrective actions where required.
- Records of the amount of each shipment of hazardous waste placed in land disposal units.

Unmanifested Waste Report

RCI shall not accept unmanifested waste from off-site generators. Therefore 40 CFR §264.76 does not apply and additional reporting is not required. However, if for some unforeseen reason waste is accepted without a manifest then RCI shall prepare and submit a single copy of a report to the Secretary within 15 calendar days after receiving the waste. The unmanifested report shall be submitted on EPA form 870013B. The report shall be designated "unmanifested Waste Report" and shall include the following information:

- The EPA identification number, name and address of the facility;
- The date the facility received the waste;
- The EPA identification number, name, and address of the generator and the transporter, if available;
- A description and the quantity of each unmanifested hazardous waste and facility received;
- The method of storage for each of the unmanifested waste;
- The certification signed by the owner of the facility or the authorized representative;
- A brief explanation of why the waste was unmanifested.

RECORD KEEPING

The following information shall be recorded as it becomes available and shall be maintained in the operating record until closure of the CSF:

Description and quantity of hazardous waste received and the methods and dates of its storage at the Unit. This information shall also include:

- Common name of the waste.
- Applicable EPA waste codes from 40 CFR Part 261.
- Physical form of the waste.

- Description of the process generating the waste if the waste is not a waste listed in 20.4.1.300 NMAC, incorporating 40 CFR §261, Subpart D.
- Estimated or manifest-reported weight, or volume and density in one of the units specified in Appendix I of 20.4.1.500 NMAC, incorporating 40 CFR §264.
- Applicable handling code specified in Table 2, Appendix I of 20.4.1.500 NMAC, incorporating 40 CFR Part 264 (e.g., S01).
- Dates of storage.
- Records and results of waste analyses and waste determinations, including:
 - i. Waste characterizations, as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.13.
 - ii. Additional information regarding waste analysis and characterization records as provided in Permit Attachment D, Appendices D-1 and D-2.
 - iii. General requirements for ignitable, reactive, or incompatible wastes, as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.17.
 - iv. Air emission analyses as applicable under 20.4.1.500 NMAC, incorporating 40 CFR §264, Subpart CC.

Biennial Report

The Biennial report shall be submitted to the Secretary. The biennial report shall contain the following information:

- The EPA identification number, name and address of the CSF;
- The calendar year covered by the report;
- Description and the quantity of hazardous waste RCI received during the year;
- The method of storage for each hazardous waste;
- The most recent closure estimate under 40 CFR 264.142;
- Certification signed by the appropriate RCI representative.

Additional reporting as required in 40 CFR §264.77 shall be accomplished if releases, fires and explosion occur at the CSF or if the Facility closes.

Incident Report

Incident reports shall be submitted to NMED as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.56(j).