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HOTLINE QUESTIONS AND ANSWERS

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1. Location of Operating Records at Treatment, Storage, and Disposal Facilities

The owner or operator of each hazardous waste treatment, storage, or disposal facility (TSDF) must keep a written operating record at the facility. This record retention requirement applies to both facilities operating under permits and facilities qualifying for interim status (40 CFR 264/265.73). The operating record must include a significant number of records ranging from waste analysis results to closure cost estimates to tank integrity assessment records. Must TSDF owner/operators maintain all of the different documents making up the operating record in one central location?

No, the federal RCRA regulations do not require owner/operators of hazardous waste TSDFs to maintain all of the documents making up the operating record in one designated area. Compliance with the operating record requirements of 264/265.73 demands only that the specified information be maintained on site at the facility; other records can be kept at remote locations. In addition, for the records that must be kept on site, the various documents making up the operating record need not be consolidated in one office as long as they are available for review somewhere on the facility grounds (this might be more practical in the case of a large facility with multiple buildings). In order to improve accessibility to and control over these key documents, however, EPA recommends that, where possible, all of the contents of the operating record be retained in a central area under the supervision of one designated individual.