

Would Your RCRA Records Pass an Inspection?

Having your hazardous waste records organized, complete and up-to-date cannot only simplify your ongoing recordkeeping requirements; it can keep your company from receiving violations and fines in the event of an inspection. Many of the most common violations cited by inspectors fall into the administrative category.

The following items must be retained onsite by generators.

HAZARDOUS WASTE RECORD	RETENTION TIME
Manifests	Signed copies from disposal site for 3 years
Manifest Exception Reports	3 years
Land Ban Restriction Forms	3 years, from date last shipped
Waste Analysis Data	Keep test results, analyses or other documentation of any waste determinations for 3 years. This includes copies of waste profile sheets provided by the disposal company. If the determination is based upon the generators knowledge of materials and processes, include the applicable data such as MSDSs.
Drum Storage Inspections	Logs for 3 years from the date of weekly inspection
All Documentation for a Hazardous Waste Tank System	Indefinitely, for the life of the tank system
Hazardous Waste Tank Inspections	Tank inspection records (daily in most cases) for at least 3 years from inspection date
Contingency Plan *	Maintained at facility and must reflect current personnel, phone numbers and site conditions. Required for Large Quantity Generators, and recommended for small quantity generators.
Training Records *	Keep training records on current personnel until closure of the facility; on former employees for 3 years from their termination date
Annual Waste Report *	3 years

* These are required of Large Quantity Generators.

If involved in enforcement activity, retain all records indefinitely.

You can review this table to verify that your facility has the required documents. **Admiral Environmental Services** can help you recognize and maintain proper records to proactively prepare for a possible inspection. Our experienced professionals will review your files and recordkeeping activities and let you know if there are any areas needing improvement.

Philip A Twomey, P.E.
President