

APPENDIX XXI  
RECORDS RETENTION REQUIREMENTS  
FOR  
EVOQUA WATER TECHNOLOGIES  
PARKER REACTIVATION FACILITY  
PARKER, ARIZONA

Revision 2  
June 2014

# **Evoqua Water Technologies**

## **CORPORATE RECORDS RETENTION PLAN**

The objective of this plan is to establish guidelines for retention of facility records to ensure consistency with regulatory requirements and company policy. The records that are subject to this guideline may exist in a variety of physical forms, including paper documents, electronic data, video tape, audio tape, microfilm, microfiche, and other forms of data storage.

All facility records are to be retained for the longest period required by either applicable law or company policy. Upon the conclusion of the longer record retention period, records should be destroyed to reduce the costs of storage, indexing and handling the large quantity of records which would otherwise accumulate.

Destruction of records identified in this guideline should take place only in compliance with these provisions in order to avoid any inference that a particular record was inappropriately destroyed. Records that are no longer necessary to retain under this guideline may need to be retained for other unusual circumstances, such as litigation or government investigation. If for any reason there is a question about whether a document should be retained due to such unusual circumstances, company legal counsel should be consulted prior to record destruction.

The attached records retention list contains the legal retention requirement and the company's retention requirement for specific identified forms of records, and the longer of the two retention periods shall apply.

## Regulatory Records Retention Requirements

### EVOQUA WATER TECHNOLOGIES – PARKER FACILITY

Document	Regulation	Regulatory Requirement	Evoqua Water Technologies Requirement
<b><i>Generator Requirements</i></b>			
	<b><i>40 CFR 262</i></b>		
Waste reclamation agreement	262.20 (e)(2)	3 years from termination or expiration	
Generator copy of manifest	262.40 (a)	3 years* from date of acceptance by transporter	
Biennial Report & Exception Report	262.40 (b)	3 years* from due date	
Waste analyses	262.40 (c)	3 years* from date sent for on-site/off-site TSD	
<b><i>Treatment Storage, and Disposal Facilities</i></b>			
	<b><i>40 CFR 264*</i></b>		
Inspection log	264.15 (d)	3 years from date of inspection	
Training records on current personnel	264.16 (e)	Until closure of facility	
Training records on former personnel	264.16 (e)	3 years from last day of work at facility	
TSD Facility's copy of manifest	264.71 (a)(5)	3 years from date of delivery	
Shipping papers in lieu of manifest	264.71 (b)(5)	3 years from date of delivery	
Operating Record, including (1) Description and quantity of each haz waste rec'd, methods and dates of tsd at the facility; (2) Location of each haz waste w/in facility and quantity at each location; ** (3) Records and results of waste analyses. waste determinations and trial tests performed as required by: <ul style="list-style-type: none"> <li>● 264.13 Waste Analysis Plan</li> <li>● 264.17 Ignitable, Reactive or Incompatible Waste</li> <li>● 264.314 Landfills</li> <li>● 264.341 Incinerators</li> </ul>	264.73	Until Closure of Facility (Unless otherwise noted)	

Document	Regulation	Regulatory Requirement	Evoqua Water Technologies Requirement
<ul style="list-style-type: none"> <li>● 264.1034 Subpart AA Process Vent Emissions</li> <li>● 264.1063 Subpart BB Equipment Leaks</li> <li>● 264.1084 Subpart CC Tank and Container Emissions</li> <li>● 268.4(a) and 268.7 Land Disposal</li> </ul> <p>(4) Summary reports and details of all incidents requiring implementation of contingency plan;</p> <p>(5) Inspection records required by 264.15(d) (only retain for 3 years);</p> <p>(6) Monitoring, testing or analytical data and corrective action required by:</p> <ul style="list-style-type: none"> <li>● 264.19 CQA Program</li> <li>● 264.191, 193, and .195 Tank Systems</li> <li>● 265.222, .223, and .226 Surface Impoundments</li> <li>● 264.252-264.254 Waste Piles</li> <li>● 264.276, .278, and .280(d)(1) Land Treatment</li> <li>● 264.302, .303, .304 and .309 Landfills</li> <li>● 264.347 Incinerators</li> <li>● 264.602 Miscellaneous Units</li> <li>● 264.1034(c)-(f) and .1035 Subpart AA Process Vent Emissions</li> <li>● 264.1063(d)-(i) and .1064 Subpart BB Equipment Leaks</li> <li>● 264.1082-.1090 Subpart CC Tank and Container Emissions</li> <li>● 264.12(b) Notices to generators</li> </ul> <p>(7) Closure cost estimates;</p> <p>(8) Waste minimization</p> <p>(9) Records of quantities and dates of haz waste placed in land disposal units under an LDR</p>		3 years	

Document	Regulation	Regulatory Requirement	Evoqua Water Technologies Requirement
extension (see §268.5-8); (10) For off-site treatment, LDR notice, certification and demonstration, if applicable (§268.7 or 8); (11) For on-site treatment, LDR notice, certification and demonstration, if applicable (§268.7 or 8); (12) For off-site land disposal, LDR notice, certification and demonstration, if applicable (§268.7 or 8); (13) For off-site storage, LDR notice, certification and demonstration, if applicable (§268.7 or 8); (14) For on-site storage, LDR notice, certification and demonstration, if applicable (§268.7 or 8). (15) Records required by 264.1(j)(13).			
Monitoring records for closed-vent systems & control devices	264.1035 (d)	3 years from date of activity	
Demonstration of non-applicability of air emission standards	264.1064(k)(3)	Up-to-date in operating record	
<b>Land Disposal Restrictions</b>	<b>40 CFR 268</b>		
Generator notices, certifications, waste analyses, and other LDR documentation	268.7 (a)(8)	3 years from date sent for tsd	
SQG tolling agreement	268.7 (e)(2)	3 years after termination or expiration	
<b>NESHAP – Subpart FF – Benzene Waste Operations</b>	<b>40 CFR Part 61, Subparts A and FF</b>		
Records of monitoring data, calibration checks, and occurrence and duration of monitoring system malfunction or inoperation	61.14(f)	2 years	
Records of emission test results and other data needed to determine emissions	61.13(g)	2 years	
All other records required to be maintained under	61.356(a)	2 years from date information is	

Document	Regulation	Regulatory Requirement	Evoqua Water Technologies Requirement
Subpart FF		recorded	
<b>Toxic Chemical Release Reporting</b>	<b>40 CFR 372</b>		
Form R and supporting documentation	372.10	3 years from submittal	
<b>Industrial Wastewater Discharge Permit</b>	<b>CSSJV</b>		
All records, books, correspondence, reports, and info related to monitoring, sampling and chemical analysis	Permit No. 1002-96	3 years (or until related enforcement or litigation activities are completed)	

\* Periods above extended during enforcement action or at the request of Administrator. 40 CFR 262.40(d), 40 CFR 265.74(b), 40 CFR 268.7(a)(8).  
\*\* A copy of all records of waste disposal locations and quantities must be submitted to the Regional Administrator and local land authority upon closure of the facility. 40 CFR 264.119(a).

Operating and Maintenance Manuals Maintained on Site

Equipment *	Manufacturer/ Supplier **	Purpose
Spent Carbon GAC Probes	Dynatrol	Spent Tank Level Control
Eductors	Penberthy	Transferring Spent Carbon
Spent Carbon Storage Tanks	Unknown	Storing Spent Carbon
Carbon Vessels	Siemens	Vapor Control for Spent Tanks
T-Tank PRV	Tyco	Spent Tanks Pressure Relief Valve
T-18 Furnace Feed Tank	Modern	Storing Spent Carbon
Furnace Feed Valve	Linatex	Feed Valve
Dewater Screw	B.W. Sinclair	Dewater Spent Carbon
Weigh Belt	Merrick	Measuring Spent Carbon Feed Rate
Rotary Air Lock	Wm. Meyer	Transfer Spent Carbon

LMI Chemical Pumps	LMI	Off Gas pH control
Magnetic Flow Meters	Rosemount	Off Gas Liquid Flow
Scrubber Pumps	Goulds	Venturi/Packed Bed Pumps
Quench/Venturi Scrubber	Clean Gas Inc.	Air Pollution Control
Packed Bed Scrubber	Clean Gas Inc.	Air Pollution Control
WESP	Clean Gas Inc.	Air Pollution Control
ID Fan	Barron	Gas
Stack	Warren Environmental	Gas Dispersion
CEMS Carbon Monoxide	TECO/Siemens	Measure Carbon Monoxide
CEMS Oxygen Analyzers	Ametek	Measure Oxygen
Stack Flow Meter	Cemtek	Measure Stack Flow Rate
Reactivation Furnace (RF-2)	Hankin Environmental	Reactivate Spent Carbon
Afterburner (AB-2)	Hankin Environmental	Destruction of Organics
Natural Gas Burners	North American	Temperature Control
Thermocouples	Pyco	Temperature Monitoring

\* Note - This table includes components of the facility that are exempt from permitting. Data related to these components is provided for informational purposes and ease of review only and they are not intended to become regulated components of the hazardous waste facility. .

\*\* Note – Manufactures are listed for informational purposes only. Facility may elect to use other vendors with comparable products.