

9475.1984(01)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

APRIL 84

2. a) Is a generator required to keep copies of biennial reports and manifests at the site? The RCRA definition of generator is site specific.

b) Is a TSDF required to keep copies of manifests and biennial reports on site?

a) 262.40 does not specify that a generator must keep copies of manifests and biennial reports on site. Copies of both can be kept at corporate headquarters. It must be noted, however, that 3007(a) of RCRA states that a generator must be able to provide to EPA or duly designated personnel information on or access to records regarding waste management.

b) 265.71(a)(5) requires TSDF's to retain copies of manifests on site for at least three years from the date of delivery. 265.74(a) states that all required records must be furnished upon request and made available for inspection by EPA personnel. Biennial reports are required records.