

APPENDIX XVII

RECORDS RETENTION REQUIREMENTS

FOR

SIEMENS WATER TECHNOLOGIES CORP.

PARKER REACTIVATION FACILITY

PARKER, ARIZONA

Revision 0
February 2007

Siemens Water Technologies Corp.

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

SIEMENS WATER TECHNOLOGIES CORP. – PARKER FACILITY

Document	Regulation	Regulatory Requirement	USFilter Westates
<i>Generator Requirements</i>	<i>40 CFR 262</i>		Requirement
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	
<i>Treatment Storage, and Disposal Facilities</i>	<i>40 CFR 264*</i>		
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"> • 264.13 Waste Analysis Plan • 264.17 Ignitable, Reactive or Incompatible Waste • 264.314 Landfills • 264.341 Incinerators 	264.73	Until Closure of Facility (Unless otherwise noted)	

<ul style="list-style-type: none"> • 264.1034 Subpart AA Process Vent Emissions • 264.1063 Subpart BB Equipment Leaks • 264.1084 Subpart CC Tank and Container Emissions • 268.4(a) and 268.7 Land Disposal <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"> • 264.19 CQA Program • 264.191, 193, and .195 Tank Systems • 265.222, .223, and .226 Surface Impoundments • 264.252-264.254 Waste Piles • 264.276, .278, and .280(d)(1) Land Treatment • 264.302, .303, .304 and .309 Landfills • 264.347 Incinerators • 264.602 Miscellaneous Units • 264.1034(c)-(f) and .1035 Subpart AA Process Vent Emissions • 264.1063(d)-(i) and .1064 Subpart BB Equipment Leaks • 264.1082-.1090 Subpart CC Tank and Container Emissions • 264.12(b) Notices to generators <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 extension (see §268.5-8);</p> <p>(10) For off-site treatment, LDR notice, certification</p>		3 years	
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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	
Land Disposal Restrictions	40 CFR 268		
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	
NESHAP – Subpart FF – Benzene Waste Operations	40 CFR Part 61, Subparts A and FF		
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 Subpart FF	61.356(a)	2 years from date information is recorded	
Toxic Chemical Release Reporting	40 CFR 372		
Form R and supporting documentation	372.10	3 years from submittal	

<i>Industrial Wastewater Discharge Permit</i>	<i>CSSJV</i>		
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).