



Solid and Hazardous Waste Recordkeeping Requirements Technical Guidance Document HW-2015-G1

This document describes the Bureau of Waste Management's (BWM's) recordkeeping requirements for solid waste facilities and hazardous waste generators in Kansas.

Introduction

Recordkeeping is a vital part of any compliance program. It is imperative that required records are maintained and available for review by both facility and regulatory personnel.

It is important to note that the guidance provided in this document does not apply to recordkeeping at permitted and interim status hazardous waste treatment, storage, and disposal facilities.

Maintaining Records versus Maintaining Records On-Site

Regulations and permits issued by BWM require facilities to maintain certain records. In general, if the regulation or permit does not specify that the records be maintained on-site, then BWM does not require it. The exception to this is documents that, due to their purpose, must be maintained on-site. Examples include emergency preparedness documents, e.g., contingency plans and information that must be posted.

If records are not maintained on-site, they should be readily available for review during any state or federal inspection. If BWM specifies in a permit or variance that records may be maintained at an off-site location, state and federal inspectors will plan to review those records at that location.

Occasionally a facility may wish to contract with a third party to maintain its records. This is acceptable as long as the required records can be produced during any state or federal inspection.

Electronic Recordkeeping

Technological advancements have made it easier and more cost effective to create and manage records electronically. BWM supports these efforts as long as the records can be produced for review during any state or federal inspection. This record review can take place on one of the facility's electronic devices (e.g., computer, tablet) or the records can be printed during the inspection, at the discretion of facility personnel.

If requested by the inspector, hard copies of the specified electronic records must be provided by facility personnel during the inspection for the inspector to take with them. However, if a copying device is not available at the facility, the inspector will give the facility a reasonable amount of time in which to get copies made and sent to the inspector.

Timeline for Producing Records

In general, all records must be produced for review during any state or federal inspection. If extenuating circumstances make this impossible, this should be discussed with the inspector at the beginning of the inspection so that reasonable deadlines can be established to produce the records. Failure to produce records by the end of the inspection may result in violations for not maintaining those records.

For additional information regarding the proper management of solid or hazardous waste in Kansas, you may visit the Bureau of Waste Management website at www.kdheks.gov/waste/ or contact the Bureau at: (785) 296-1600, bwm_web@kdheks.gov, or the address at the top of this document.