



Facility name

EPA I.D. #

Generator category

2023 Hazardous Waste Compliance Calendar

Developed and published by the Kansas Small Business Environmental Assistance Program

Inspection Logs and Tips

Weekly/Monthly Inspection Log

| | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|
| Date (enter date a weekly or monthly inspection was conducted) | | | | | | | | | | |
| Time | | | | | | | | | | |
| Each container clearly marked with the words "Hazardous Waste" | Y | N | Y | N | Y | N | Y | N | Y | N |
| Marked with accumulation start date | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers properly closed | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers in good condition | Y | N | Y | N | Y | N | Y | N | Y | N |
| Incompatible wastes segregated | Y | N | Y | N | Y | N | Y | N | Y | N |
| If anything needed to be fixed, explain here and list date it was fixed. | | | | | | | | | | |

Accumulating CESQGs and KSQGs are required to conduct monthly inspections of hazardous waste storage areas. SQGs and LQGs are required to conduct weekly inspections of hazardous waste storage areas.

Please print full name of person who performed the weekly or monthly inspection.

Week 1 inspected by _____

Week 2 inspected by _____

Week 3 inspected by _____

Week 4 inspected by _____



In addition to annual classroom training, on-site training that is specific to the handler's hazardous waste management duties, is required.



This compliance calendar is intended for CESQGs, KSQGs and SQGs. The training and other requirements for LQGs are more detailed and are not necessarily included in this compliance calendar.

JANUARY 2023

| Sun | Mon | Tues | Wed | Thur | Fri | Sat |
|----------------------------------|-----|------|-----|------|-----|-----|
| 1 New Year's Day | 2 | 3 | 4 | 5 | 6 | 7 |
| 8 | 9 | 10 | 11 | 12 | 13 | 14 |
| 15 Martin Luther King Jr. Day | 16 | 17 | 18 | 19 | 20 | 21 |
| 22 | 23 | 24 | 25 | 26 | 27 | 28 |
| 29 | 30 | 31 | 1 | 2 | 3 | 4 |

Mark on the calendar—

- each day a hazardous waste storage inspection was conducted
- each day hazardous waste was shipped

Things to consider—

- How much hazardous waste was generated this month?
- How much hazardous waste is currently in storage?
- What is the oldest accumulation start date in storage?



Don't forget to document your annual training. The log to the right is an example of what training records should include.

Hazardous Waste Training

January is a great time to host annual training. This annual training should include classroom and on-site training. New employees must have training within six months of taking a position that requires handling or managing hazardous waste and then annually thereafter. It is imperative to supplement the classroom training with on-site training. Employers must document such training, including who was trained, when, and a description of the training provided. Training must be documented and records retained for three years. Other than non-accumulating CESQGs, all generators are required to provide annual training to their employees with regard to those employees' hazardous waste management duties. Classroom training options are widely available and include SBEAP.org online training at www.sbeap.org/waste-management/hazardous-waste and KDHE's fall workshops found at www.kdhe.ks.gov/637/Hazardous-Waste-Training.

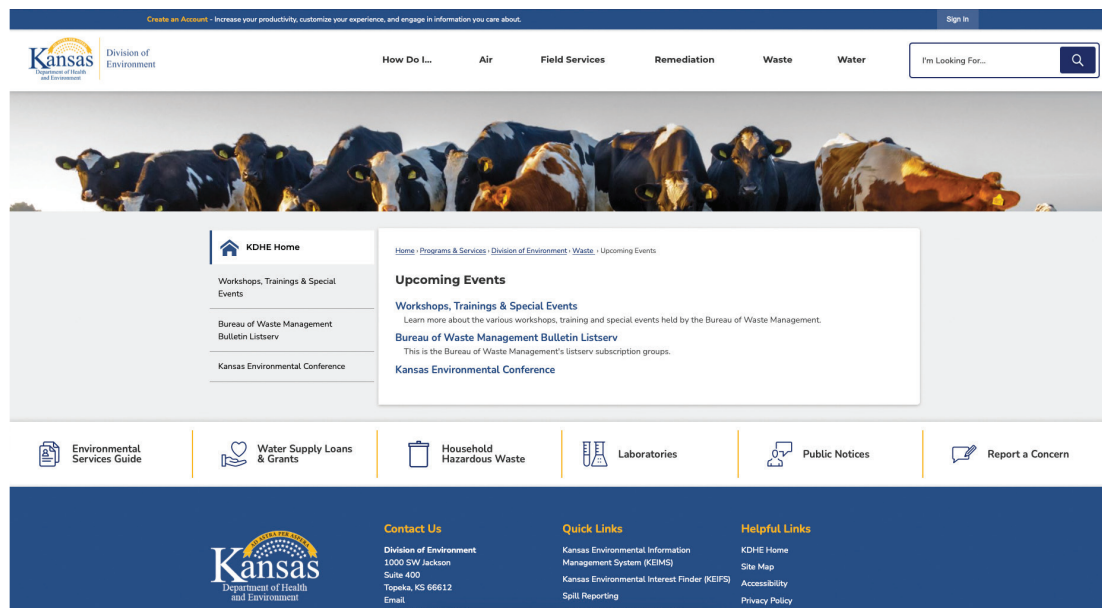
| | |
|---|-------|
| Description of training topics covered: | |
| Date: | Time: |
| List of employees attending: | |
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For additional assistance, call KDHE at 785-296-1600 or SBEAP at 800-578-8898.



NOTE

The KDHE Bureau of Waste Management now has a new home on the internet: www.kdhe.ks.gov/168/Waste.



Date (enter date a weekly or monthly inspection was conducted)

Time

Each container clearly marked with the words "Hazardous Waste"

Marked with accumulation start date

Containers properly closed

Containers in good condition

Incompatible wastes segregated

If anything needed to be fixed,
explain here and list date it was fixed.

Accumulating CESQGs and KSQGs are required to conduct monthly inspections of hazardous waste storage areas. SQGs and LQGs are required to conduct weekly inspections of hazardous waste storage areas.

Please print full name of person who performed the weekly or monthly inspection.

Week 1 inspected by _____

Week 2 inspected by _____

Week 3 inspected by _____

Week 4 inspected by _____

FEBRUARY 2023

Sun Mon Tues Wed Thur Fri Sat

| | | | | | | |
|----|----|----|----|----|----|----|
| 29 | 30 | 31 | 1 | 2 | 3 | 4 |
| 5 | 6 | 7 | 8 | 9 | 10 | 11 |
| 12 | 13 | 14 | 15 | 16 | 17 | 18 |
| 19 | 20 | 21 | 22 | 23 | 24 | 25 |
| 26 | 27 | 28 | 1 | 2 | 3 | 4 |

Mark on the calendar—

- each day a hazardous waste storage inspection was conducted
- each day hazardous waste was shipped

Things to consider—

- How much hazardous waste was generated this month?
- How much hazardous waste is currently in storage?
- What is the oldest accumulation start date in storage?

For additional assistance, call KDHE at 785-296-1600 or SBEAP at 800-578-8898.

What's new at KDHE?

KDHE has made a number of changes to its website, which can now be found at www.kdhe.ks.gov/168/Waste. Forms for hazardous waste generators and transporters can now be accessed at www.kdhe.ks.gov/602/Hazardous-Waste-Generators-Transporters. For regulations, policies and technical guidance documents, please visit www.kdhe.ks.gov/647/Regulations-Policies-Technical-Guidance. KDHE has also created a number of Bulletin Listservs; visit www.kdhe.ks.gov/1732/Bureau-of-Waste-Management-Bulletin-List to see the list of topics and register.

The Hazardous Waste Updates Bulletin Listserv is a great way to stay on top of current hazardous waste generator and transporter topics. Go to www.kdhe.ks.gov/1732/Bureau-of-Waste-Management-Bulletin-List to subscribe.

[illegible]

Weekly/Monthly Inspection Log

| | | | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|---|---|
| Date (enter date a weekly or monthly inspection was conducted) | | | | | | | | | | | | |
| Time | | | | | | | | | | | | |
| Each container clearly marked with the words "Hazardous Waste" | Y | N | Y | N | Y | N | Y | N | Y | N | Y | N |
| Marked with accumulation start date | Y | N | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers properly closed | Y | N | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers in good condition | Y | N | Y | N | Y | N | Y | N | Y | N | Y | N |
| Incompatible wastes segregated | Y | N | Y | N | Y | N | Y | N | Y | N | Y | N |
| If anything needed to be fixed, explain here and list date it was fixed. | | | | | | | | | | | | |

Accumulating CESQGs and KSQGs are required to conduct monthly inspections of hazardous waste storage areas. SQGs and LQGs are required to conduct weekly inspections of hazardous waste storage areas.

Please print full name of person who performed the weekly or monthly inspection.

Week 1 inspected by _____

Week 2 inspected by _____

Week 3 inspected by _____

Week 4 inspected by _____



One of the top noncompliance issues KDHE cites is for "failure to document your hazardous waste determinations."



A vendor's waste profile can be helpful when making a determination but it is not a substitute for the required determination documentation.



MARCH 2023

| Sun | Mon | Tues | Wed | Thur | Fri | Sat |
|---|-----|------|-----|------|---------------------------|-----|
| 26 | 27 | 28 | 1 | 2 | 3 | 4 |
| 5 | 6 | 7 | 8 | 9 | 10 | 11 |
| 12 | 13 | 14 | 15 | 16 | 17 Saint Patrick's Day | 18 |
| 19 | 20 | 21 | 22 | 23 | 24 | 25 |
| 26 | 27 | 28 | 29 | 30 | 31 | 1 |
| Reminder: KSQGs and SQGs must submit their annual reports and monitoring fees by April 1. | | | | | | |

Mark on the calendar—

- each day a hazardous waste storage inspection was conducted
- each day hazardous waste was shipped

Things to consider—

- How much hazardous waste was generated this month?
- How much hazardous waste is currently in storage?
- What is the oldest accumulation start date in storage?



Check out the “Hazardous waste determination” video recently published at www.sbeap.org/waste-management/hazardous-waste.

Documenting hazardous waste determinations

Did you know that a hazardous waste determination is REQUIRED to be documented for each hazardous waste generated at your facility? So what steps should you take and what is needed? Most generators can use their “knowledge of process and SDS,” rather than testing when making a hazardous waste determination. To use knowledge of process, KDHE recommends generators follow four steps:

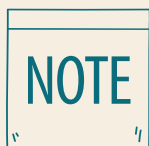
- 1) document all waste streams and the quantities generated each month;
- 2) check to see if the waste meets the definition of a solid waste in 40 CFR 261.2;
- 3) if the waste meets that definition, use the process knowledge and the SDS to determine if the waste is a “characteristic and/or listed hazardous waste”; and
- 4) prepare the written documentation. This can be in an electronic format or on a hard copy like the KDHE example found at www.kdhe.ks.gov/DocumentCenter/View/5427/Hazardous-Waste-Determinations-and-Documentation-PDF.

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|---|-------|
| Description of training topics covered: | |
| Date: | Time: |
| List of employees attending: | |
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For additional assistance, call KDHE at 785-296-1600 or SBEAP at 800-578-8898.



Facilities' generator-specific hazardous waste recordkeeping responsibilities are outlined in the Kansas Hazardous Waste Generator handbook. The handbook can be found online at www.kdhe.ks.gov/DocumentCenter/View/4882/Hazardous-Waste-Generator-Handbook-PDF.



This calendar can be used for container-inspection and training records.



Weekly/Monthly Inspection Log

| | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|
| Date (enter date a weekly or monthly inspection was conducted) | | | | | | | | | | |
| Time | | | | | | | | | | |
| Each container clearly marked with the words "Hazardous Waste" | Y | N | Y | N | Y | N | Y | N | Y | N |
| Marked with accumulation start date | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers properly closed | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers in good condition | Y | N | Y | N | Y | N | Y | N | Y | N |
| Incompatible wastes segregated | Y | N | Y | N | Y | N | Y | N | Y | N |
| If anything needed to be fixed, explain here and list date it was fixed. | | | | | | | | | | |

Accumulating CESQGs and KSQGs are required to conduct monthly inspections of hazardous waste storage areas. SQGs and LQGs are required to conduct weekly inspections of hazardous waste storage areas.

Please print full name of person who performed the weekly or monthly inspection.

Week 1 inspected by _____

Week 2 inspected by _____

Week 3 inspected by _____

Week 4 inspected by _____

APRIL 2023

Sun Mon Tues Wed Thur Fri Sat

| | | | | | | |
|--------------------|----|----|----|----|----|----|
| 26 | 27 | 28 | 29 | 30 | 31 | 1 |
| 2 | 3 | 4 | 5 | 6 | 7 | 8 |
| 9 Easter Sunday | 10 | 11 | 12 | 13 | 14 | 15 |
| 16 | 17 | 18 | 19 | 20 | 21 | 22 |
| 23 30 | 24 | 25 | 26 | 27 | 28 | 29 |

Mark on the calendar—

- each day a hazardous waste storage inspection was conducted
- each day hazardous waste was shipped

Things to consider—

- How much hazardous waste was generated this month?
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- What is the oldest accumulation start date in storage?

Good recordkeeping is a vital part of compliance and often a sign a facility is well-managed and likely has few violations. Use different folders to separate waste documents from your stormwater or air quality documents.



Hazardous waste recordkeeping

With the exception of hazardous waste determination records, all hazardous waste records need to be maintained for at least three years and should be readily available to inspectors. These records include, but are not limited to, waste determinations and associated SDS or lab analysis documents, storage-area inspection logs, hazardous waste manifests and land disposal restrictions (LDRs), training records, emergency preparedness documents, contingency plans and exception reports. During an inspection, the inspector will complete a thorough review of these records. If not maintained on site, they should be made available before the end of the inspection or a violation for failure to maintain the proper records may be cited. If an inspector requests hard copies of a specified electronic record, the facility must provide them. Read more at www.kdhe.ks.gov/DocumentCenter/View/5417/Solid-and-Hazardous-Waste-Recordkeeping-Requirements-HW-2015-G1-PDF.

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|---|-------|
| Description of training topics covered: | |
| Date: | Time: |
| List of employees attending: | |
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For additional assistance, call KDHE at 785-296-1600 or SBEAP at 800-578-8898.

Weekly/Monthly Inspection Log

| | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|
| Date (enter date a weekly or monthly inspection was conducted) | | | | | | | | | | |
| Time | | | | | | | | | | |
| Each container clearly marked with the words "Hazardous Waste" | Y | N | Y | N | Y | N | Y | N | Y | N |
| Marked with accumulation start date | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers properly closed | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers in good condition | Y | N | Y | N | Y | N | Y | N | Y | N |
| Incompatible wastes segregated | Y | N | Y | N | Y | N | Y | N | Y | N |
| If anything needed to be fixed, explain here and list date it was fixed. | | | | | | | | | | |

Accumulating CESQGs and KSQGs are required to conduct monthly inspections of hazardous waste storage areas. SQGs and LQGs are required to conduct weekly inspections of hazardous waste storage areas.

Please print full name of person who performed the weekly or monthly inspection.

Week 1 inspected by _____

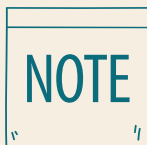
Week 2 inspected by _____

Week 3 inspected by _____

Week 4 inspected by _____



Although federal regulations have three generator categories, Kansas currently has four. It is critical for a facility to know its generator category. Different categories have different regulatory requirements.



A generator must determine which category a facility is classified as in order to determine which regulations to follow. This includes determining if a facility is going to follow the Kansas Conditionally Exempt Small Quantity Generator (CESQG) or the Federal Very Small Quantity Generator (VSQG) definition and subsequent rules.



MAY 2023

Mon

Tues

Wed

Thur

Fri

Sat

| | | | | | | |
|--------------|--------------|----|----|----|----|----|
| 30 | 1 | 2 | 3 | 4 | 5 | 6 |
| 7 | 8 | 9 | 10 | 11 | 12 | 13 |
| 14 | 15 | 16 | 17 | 18 | 19 | 20 |
| Mother's Day | | | | | | |
| 21 | 22 | 23 | 24 | 25 | 26 | 27 |
| 28 | 29 | 30 | 31 | 1 | 2 | 3 |
| | Memorial Day | | | | | |

Mark on the calendar—

- each day a hazardous waste storage inspection was conducted
- each day hazardous waste was shipped

Things to consider—

- How much hazardous waste was generated this month?
- How much hazardous waste is currently in storage?
- What is the oldest accumulation start date in storage?

If your facility's generator category changes, you have 60 days to update the status and waste codes using the "Notification of Regulated Waste Activity" form.



For additional assistance, call KDHE at 785-296-1600 or SBEAP at 800-578-8898.

Generator Categories

In Kansas, hazardous waste generators currently fall into one of four categories, based on the amount of hazardous waste generated at the facility in a calendar month. Generators cannot average the amounts over a few months or year, but instead should maintain careful generation records. The four generator category names and quantities follow.

- **A conditionally exempt small quantity generator (CESQG)** generates less than 55 pounds of hazardous waste in a calendar month and accumulates less than 2,200 pounds on site.

- **A Kansas small quantity generator (KSQG)** generates 55 pounds or more, but no more than 220 pounds, of hazardous waste in a calendar month and accumulates no more than 2,200 pounds on site.

- **A small quantity generator (SQG)** generates more than 220 pounds, but less than 2,200 pounds, of hazardous waste in a calendar month, stores waste for up to 180 days and never exceeds accumulations of 13,200 pounds on site at any one time.

- **A large quantity generator (LQG)** generates 2,200 pounds or more of hazardous waste in a calendar month, and stores waste on site for 90 days or less.

Please note the quantities listed above do not include limits for acutely hazardous waste.

[illegible]

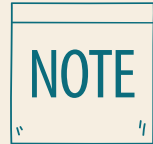
Description of training topics covered:

Date: _____ Time: _____

List of employees attending:



This calendar can be used to document your weekly or monthly inspection log. Make sure the inspector's name is printed clearly on it. Initials and illegible signatures are not acceptable. Then maintain these logs for a minimum of three years.



All containers (storage and satellite accumulation) must be labeled with the words "hazardous waste," in good condition and compatible with the contents and kept closed unless actively adding or removing waste.

Weekly/Monthly Inspection Log

| | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|
| Date (enter date a weekly or monthly inspection was conducted) | | | | | | | | | | |
| Time | | | | | | | | | | |
| Each container clearly marked with the words "Hazardous Waste" | Y | N | Y | N | Y | N | Y | N | Y | N |
| Marked with accumulation start date | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers properly closed | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers in good condition | Y | N | Y | N | Y | N | Y | N | Y | N |
| Incompatible wastes segregated | Y | N | Y | N | Y | N | Y | N | Y | N |
| If anything needed to be fixed, explain here and list date it was fixed. | | | | | | | | | | |

Accumulating CESQGs and KSQGs are required to conduct monthly inspections of hazardous waste storage areas. SQGs and LQGs are required to conduct weekly inspections of hazardous waste storage areas.

Please print full name of person who performed the weekly or monthly inspection.

Week 1 inspected by _____

Week 2 inspected by _____

Week 3 inspected by _____

Week 4 inspected by _____

JUNE 2023

Mon

Tues

Wed

Thur

Fri

Sat

| | | | | | | |
|--------------|------------|----|----|----|----|----|
| 28 | 29 | 30 | 31 | 1 | 2 | 3 |
| 4 | 5 | 6 | 7 | 8 | 9 | 10 |
| 11 | 12 | 13 | 14 | 15 | 16 | 17 |
| 18 | 19 | 20 | 21 | 22 | 23 | 24 |
| Father's Day | Juneteenth | | | | | |
| 25 | 26 | 27 | 28 | 29 | 30 | 1 |

Mark on the calendar—

- each day a hazardous waste storage inspection was conducted
- each day hazardous waste was shipped

Things to consider—

- How much hazardous waste was generated this month?
- How much hazardous waste is currently in storage?
- What is the oldest accumulation start date in storage?

New federal regulations, soon to be adopted by KDHE, will require containers be marked with the contents of the container, i.e. paint-solvent waste, as well as the words "hazardous waste."



For additional assistance, call KDHE at 785-296-1600 or SBEAP at 800-578-8898.

Container Management

Violations related to container management are one of the top violations inspectors note. Labeling the containers with the words "hazardous waste," and keeping the container closed except when adding or removing waste, are critical compliance components. The definition for a closed container may be different for liquids and solids, as detailed at www.kdhe.ks.gov/DocumentCenter/View/5425/Container-Management-for-Hazardous-Waste-Generators-PDF. A satellite container must be located at the point of generation and under the control of the operator. Satellite containers do not have to be inspected. A storage container must have an accumulation start date and be inspected regularly, as dictated by the generator category. Hazardous waste storage containers must be inspected for elements listed above in the inspection log. If a hazardous waste storage area is empty at the time of inspection, then note the area is empty along with the date, time and inspector name. If you don't document it, it may appear as if inspections were not completed.

[illegible]

Weekly/Monthly Inspection Log

| | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|
| Date (enter date a weekly or monthly inspection was conducted) | | | | | | | | | | |
| Time | | | | | | | | | | |
| Each container clearly marked with the words "Hazardous Waste" | Y | N | Y | N | Y | N | Y | N | Y | N |
| Marked with accumulation start date | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers properly closed | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers in good condition | Y | N | Y | N | Y | N | Y | N | Y | N |
| Incompatible wastes segregated | Y | N | Y | N | Y | N | Y | N | Y | N |
| If anything needed to be fixed, explain here and list date it was fixed. | | | | | | | | | | |

Accumulating CESQGs and KSQGs are required to conduct monthly inspections of hazardous waste storage areas. SQGs and LQGs are required to conduct weekly inspections of hazardous waste storage areas.

Please print full name of person who performed the weekly or monthly inspection.

Week 1 inspected by _____

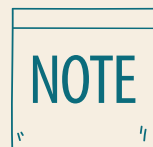
Week 2 inspected by _____

Week 3 inspected by _____

Week 4 inspected by _____



It is important for generators to know the difference between a "satellite container" and a "storage container," as they have different labeling and inspection requirements. Questions? Call SBEAP at 800-578-8898



If you use a funnel on your satellite container, make sure the lid locks down or is spring-loaded to ensure the container is properly closed.

JULY 2023

| Sun | Mon | Tues | Wed | Thur | Fri | Sat |
|----------|----------|-----------------------|-----|------|-----|-----|
| 25 | 26 | 27 | 28 | 29 | 30 | 1 |
| 2 | 3 | 4 Independence Day | 5 | 6 | 7 | 8 |
| 9 | 10 | 11 | 12 | 13 | 14 | 15 |
| 16 | 17 | 18 | 19 | 20 | 21 | 22 |
| 23 30 | 24 31 | 25 | 26 | 27 | 28 | 29 |

Mark on the calendar—

- each day a hazardous waste storage inspection was conducted
- each day hazardous waste was shipped

Things to consider—

- How much hazardous waste was generated this month?
- How much hazardous waste is currently in storage?
- What is the oldest accumulation start date in storage?

For additional assistance, call KDHE at 785-296-1600 or SBEAP at 800-578-8898.

Satellite Containers

Use of satellite containers can make accumulating waste easier and safer. All generators, except CESQGs, are allowed to use them. These containers should be located at the point of generation and under the control of the operator. Container size should not be larger than 55 gallons and must be marked with the words "hazardous waste." Only one satellite container for each waste stream from the point of generation is allowed in a satellite collection area. Once the container is full, it is considered a "storage container" and needs to be dated with the accumulation start date and moved to a storage area within three days.

Containers that meet the definition of “RCRA empty” do NOT need to be managed as hazardous waste. Consult the Generator Handbook or go to www.kdhe.ks.gov/DocumentCenter/View/4882/Hazardous-Waste-Generator-Handbook-PDF for details.



TIP

[illegible]



Episodic event provisions were added as part of the 2016 Hazardous Waste Generator Improvements Final Rule which can be found at www.kdhe.ks.gov/DocumentCenter/View/5388/Environmental-Protection-Agency-Hazardous-Waste-Generator-Improvements-Rule-PDF?bidId.



An episodic event is defined in the federal rule as an activity or activities, either planned or unplanned, that does not normally occur during generator operations, resulting in an increase in the generation of hazardous wastes that exceeds the calendar month quantity limits for the generator's usual category.



Weekly/Monthly Inspection Log

| | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|
| Date (enter date a weekly or monthly inspection was conducted) | | | | | | | | | | |
| Time | | | | | | | | | | |
| Each container clearly marked with the words "Hazardous Waste" | Y | N | Y | N | Y | N | Y | N | Y | N |
| Marked with accumulation start date | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers properly closed | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers in good condition | Y | N | Y | N | Y | N | Y | N | Y | N |
| Incompatible wastes segregated | Y | N | Y | N | Y | N | Y | N | Y | N |
| If anything needed to be fixed, explain here and list date it was fixed. | | | | | | | | | | |

Accumulating CESQGs and KSQGs are required to conduct monthly inspections of hazardous waste storage areas. SQGs and LQGs are required to conduct weekly inspections of hazardous waste storage areas.

Please print full name of person who performed the weekly or monthly inspection.

Week 1 inspected by _____

Week 2 inspected by _____

Week 3 inspected by _____

Week 4 inspected by _____

AUGUST 2023

Mon

Tues

Wed

Thur

Fri

Sat

| | | | | | | |
|----|----|----|----|----|----|----|
| 30 | 31 | 1 | 2 | 3 | 4 | 5 |
| 6 | 7 | 8 | 9 | 10 | 11 | 12 |
| 13 | 14 | 15 | 16 | 17 | 18 | 19 |
| 20 | 21 | 22 | 23 | 24 | 25 | 26 |
| 27 | 28 | 29 | 30 | 31 | 1 | 2 |

Mark on the calendar—

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- each day hazardous waste was shipped

Things to consider—

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For additional assistance, call KDHE at 785-296-1600 or SBEAP at 800-578-8898.

Episodic Events

Although not all changes in the “Generator Improvement Rule” have been adopted by KDHE, the use of the episodic event provision has been adopted by policy. Hazardous waste generators dealing with unusual hazardous waste generation circumstances will find this beneficial. To satisfy the notification requirement in the episodic event provision, CESQGs, KSQGs and SQGs must submit the Notification of Regulated Waste Activity form and addendum for episodic generators to the KDHE Bureau of Waste Management. Failure to comply with the provisions will result in, but is not be limited to, a change in the generator's category as appropriate.

Specifics for reporting an episodic event can be found in the Instructions for Notification of Regulated Waste Activity Form found at www.kdhe.ks.gov/DocumentCenter/View/5057/8700-12I-Instructions-for-Notification-of-Regulated-Waste-Activity-Form-PDF.

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Weekly/Monthly Inspection Log

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|--|---|---|---|---|---|---|---|---|---|---|
| Date (enter date a weekly or monthly inspection was conducted) | | | | | | | | | | |
| Time | | | | | | | | | | |
| Each container clearly marked with the words "Hazardous Waste" | Y | N | Y | N | Y | N | Y | N | Y | N |
| Marked with accumulation start date | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers properly closed | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers in good condition | Y | N | Y | N | Y | N | Y | N | Y | N |
| Incompatible wastes segregated | Y | N | Y | N | Y | N | Y | N | Y | N |
| If anything needed to be fixed, explain here and list date it was fixed. | | | | | | | | | | |

Accumulating CESQGs and KSQGs are required to conduct monthly inspections of hazardous waste storage areas. SQGs and LQGs are required to conduct weekly inspections of hazardous waste storage areas.

Please print full name of person who performed the weekly or monthly inspection.

Week 1 inspected by _____

Week 2 inspected by _____

Week 3 inspected by _____

Week 4 inspected by _____



Most facilities generating paint-booth filters that are not hazardous waste dispose of such filters in an MSWLF with a "special waste-disposal authorization." Special waste disposal authorization requests can be found at www.kdhe.ks.gov/DocumentCenter/View/4983/Special-Waste-Disposal-Request-PDF.



It is considered illegal disposal of a hazardous waste to dispose of spray-gun solvent by spraying it onto booth filters.

SEPTEMBER 2023

Sun Mon Tues Wed Thur Fri Sat

| | | | | | | |
|----|-----------|----|----|----|----|----|
| 27 | 28 | 29 | 30 | 31 | 1 | 2 |
| 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| | Labor Day | | | | | |
| 10 | 11 | 12 | 13 | 14 | 15 | 16 |
| 17 | 18 | 19 | 20 | 21 | 22 | 23 |
| 24 | 25 | 26 | 27 | 28 | 29 | 30 |

Mark on the calendar—

- each day a hazardous waste storage inspection was conducted
- each day hazardous waste was shipped

Things to consider—

- How much hazardous waste was generated this month?
- How much hazardous waste is currently in storage?
- What is the oldest accumulation start date in storage?

For additional assistance, call KDHE at 785-296-1600 or SBEAP at 800-578-8898.

Spent Paint Booth Filters

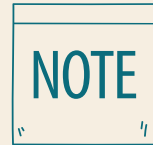
Several industries generate spent paint-booth filters when conducting the process of painting parts. As with other waste streams, generators need to determine if the spent filters are hazardous waste. Most do this by reviewing various paint SDS. If the paint contains a regulated metal, then depending on type of paint, metal concentration and paint-booth use, the filters may be hazardous waste. In these instances, generators typically send a filter sample to a certified lab for a TCLP test. Paint filters that do not have regulated metals and pass the paint-booth filter test are typically not hazardous waste and can be disposed of with a special waste authorization.

Even if a paint booth filter is no longer considered “ignitable,” it may still be combustible and able to catch fire in a dumpster.

[illegible]



If your facility utilizes an aerosol puncturing system, make sure employees operating the system are properly trained based on the manufacturer's operating specifications.



These aerosol puncture drums are typically managed as "satellite containers," not storage containers. Read more at www.kdhe.ks.gov/DocumentCenter/View/5415/Recycling-and-Disposal-of-Aerosol-Cans-PDF.

Weekly/Monthly Inspection Log

| | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|
| Date (enter date a weekly or monthly inspection was conducted) | | | | | | | | | | |
| Time | | | | | | | | | | |
| Each container clearly marked with the words "Hazardous Waste" | Y | N | Y | N | Y | N | Y | N | Y | N |
| Marked with accumulation start date | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers properly closed | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers in good condition | Y | N | Y | N | Y | N | Y | N | Y | N |
| Incompatible wastes segregated | Y | N | Y | N | Y | N | Y | N | Y | N |
| If anything needed to be fixed, explain here and list date it was fixed. | | | | | | | | | | |

Accumulating CESQGs and KSQGs are required to conduct monthly inspections of hazardous waste storage areas. SQGs and LQGs are required to conduct weekly inspections of hazardous waste storage areas.

Please print full name of person who performed the weekly or monthly inspection.

Week 1 inspected by _____

Week 2 inspected by _____

Week 3 inspected by _____

Week 4 inspected by _____

OCTOBER 2023

Sun Mon Tues Wed Thur Fri Sat

| | | | | | | |
|----|----|-----------------|----|----|----|----|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 |
| 8 | 9 | 10 | 11 | 12 | 13 | 14 |
| 15 | 16 | 17 | 18 | 19 | 20 | 21 |
| 22 | 23 | 24 | 25 | 26 | 27 | 28 |
| 29 | 30 | 31 Halloween | 1 | 2 | 3 | 4 |

Mark on the calendar—

- each day a hazardous waste storage inspection was conducted
- each day hazardous waste was shipped

Things to consider—

- How much hazardous waste was generated this month?
- How much hazardous waste is currently in storage?
- What is the oldest accumulation start date in storage?

A container that holds aerosol cans waiting to be punctured should be managed as a hazardous waste storage drum.



Aerosol Cans

“RCRA empty” aerosol cans can be disposed of or recycled as long as they meet the definition of empty. Most aerosol cans are considered “RCRA empty” when the product has been expelled from the can and only residue remains; and the pressure in the can is at or very near atmospheric pressure at normal room temperature. The only exception is if the can contained a P-listed chemical, then even the empty container must be managed as hazardous waste. If your facility generates partially full aerosol cans on a regular basis, find out why. Are the nozzles clogged? Is it a manufacturer’s problem or an employee-use problem? Loss of usable product, time to manage the containers and the price of disposal all cost money, as well as increase your waste-generation rate. The document at www.kdhe.ks.gov/DocumentCenter/View/5415/Recycling-and-Disposal-of-Aerosol-Cans-PDF further explains proper aerosol can management.

| | |
|---|-------|
| Description of training topics covered: | |
| Date: | Time: |
| List of employees attending: | |
| | |
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| | |

For additional assistance, call KDHE at 785-296-1600 or SBEAP at 800-578-8898.

Weekly/Monthly Inspection Log

| | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|
| Date (enter date a weekly or monthly inspection was conducted) | | | | | | | | | | |
| Time | | | | | | | | | | |
| Each container clearly marked with the words "Hazardous Waste" | Y | N | Y | N | Y | N | Y | N | Y | N |
| Marked with accumulation start date | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers properly closed | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers in good condition | Y | N | Y | N | Y | N | Y | N | Y | N |
| Incompatible wastes segregated | Y | N | Y | N | Y | N | Y | N | Y | N |
| If anything needed to be fixed, explain here and list date it was fixed. | | | | | | | | | | |

Accumulating CESQGs and KSQGs are required to conduct monthly inspections of hazardous waste storage areas. SQGs and LQGs are required to conduct weekly inspections of hazardous waste storage areas.

Please print full name of person who performed the weekly or monthly inspection.

Week 1 inspected by _____

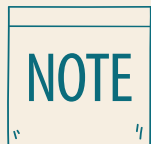
Week 2 inspected by _____

Week 3 inspected by _____

Week 4 inspected by _____



There are significant monetary and compliance advantages to managing certain common wastes as "universal waste." Read more about universal waste management requirements summarized at www.kdhe.ks.gov/DocumentCenter/View/5416/Requirements-for-Handlers-of-Universal-Waste-PDF.



Alkaline batteries do not contain heavy metals and can be disposed of in the trash when spent.



NOVEMBER 2023

Sun Mon Tues Wed Thur Fri Sat

| | | | | | | |
|----|----|----|----|--------------------|----|---------------------|
| 29 | 30 | 31 | 1 | 2 | 3 | 4 |
| 5 | 6 | 7 | 8 | 9 | 10 | 11 Veterans' Day |
| 12 | 13 | 14 | 15 | 16 | 17 | 18 |
| 19 | 20 | 21 | 22 | 23 Thanksgiving | 24 | 25 |
| 26 | 27 | 28 | 29 | 30 | 1 | 2 |

Mark on the calendar—

- each day a hazardous waste storage inspection was conducted
- each day hazardous waste was shipped

Things to consider—

- How much hazardous waste was generated this month?
- How much hazardous waste is currently in storage?
- What is the oldest accumulation start date in storage?

Although newer fluorescent lamps pass the TCLP test for mercury and are not hazardous, generators are encouraged to recycle them. As with other waste records, maintain universal waste management records for at least three years.



Universal Waste

Lamps containing mercury and batteries that contain metals are hazardous wastes unless specifically managed as “universal waste.” Certain widely generated hazardous wastes have been designated as universal waste. This designation allows universal waste handlers to manage universal waste under the streamlined requirements of 40 CFR 273, instead of the more stringent RCRA Subtitle C requirements for hazardous waste. Universal waste includes hazardous waste lamps (older fluorescent, metal halide), mercury-containing equipment (thermostats and medical equipment), hazardous waste batteries (Ni-Cd, lithium, lead-acid) and certain hazardous waste pesticides. Universal wastes do not count against your generation rate and have less-stringent container management standards. Universal waste containers must remain closed and should be appropriately labeled with the accumulation time tracked, then sent to a universal waste handler within one year from the accumulation start date.

Description of training topics covered:

Date: Time:

List of employees attending:

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|--|--|
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For additional assistance, call KDHE at 785-296-1600 or SBEAP at 800-578-8898.



Make sure used-oil containers are labeled with the words “used oil” not “waste oil.” Read more about proper management of used oil at www.kdhe.ks.gov/DocumentCenter/View/5423/Used-Oil-Generators-PDF.



Used oil sent for recycling or use as a fuel is not a hazardous waste. Careful management to prevent the contamination of used oil can save companies money.

Weekly/Monthly Inspection Log

| | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|
| Date (enter date a weekly or monthly inspection was conducted) | | | | | | | | | | |
| Time | | | | | | | | | | |
| Each container clearly marked with the words “Hazardous Waste” | Y | N | Y | N | Y | N | Y | N | Y | N |
| Marked with accumulation start date | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers properly closed | Y | N | Y | N | Y | N | Y | N | Y | N |
| Containers in good condition | Y | N | Y | N | Y | N | Y | N | Y | N |
| Incompatible wastes segregated | Y | N | Y | N | Y | N | Y | N | Y | N |
| If anything needed to be fixed, explain here and list date it was fixed. | | | | | | | | | | |

Accumulating CESQGs and KSQGs are required to conduct monthly inspections of hazardous waste storage areas. SQGs and LQGs are required to conduct weekly inspections of hazardous waste storage areas.

Please print full name of person who performed the weekly or monthly inspection.

Week 1 inspected by _____

Week 2 inspected by _____

Week 3 inspected by _____

Week 4 inspected by _____

DECEMBER 2023

Sun Mon Tues Wed Thur Fri Sat

| | | | | | | |
|--|---------------------|----|----|----|----|----|
| 26 | 27 | 28 | 29 | 30 | 1 | 2 |
| 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| 10 | 11 | 12 | 13 | 14 | 15 | 16 |
| 17 | 18 | 19 | 20 | 21 | 22 | 23 |
| 24 Christmas Eve New Year's Eve 31 | 25 Christmas Day | 26 | 27 | 28 | 29 | 30 |

Mark on the calendar—

- each day a hazardous waste storage inspection was conducted
- each day hazardous waste was shipped

Things to consider—

- How much hazardous waste was generated this month?
- How much hazardous waste is currently in storage?
- What is the oldest accumulation start date in storage?

It may seem obvious to most, but used oil may not be used as a dust suppressant, pesticide carrier, sealant or coating, or for any similar purpose.



Used Oil

A common violation is for generators to label their used oil as “waste” or “waste oil.” Unless contaminated and unable to be recycled, the words “used oil” must be on the container. “Used oil” means any oil that has been refined from crude oil or any synthetic oil, has been used and as a result of such use, is contaminated by physical or chemical impurities as defined in 40 CFR 279.10. Petroleum-based antifreeze and solvents and vegetable-based oils are not considered used oil under this regulation. Used oil sent for recycling or use as a fuel is not a hazardous waste. Recycling used oil conserves a valuable resource and saves companies money. However, oil disposed of or contaminated with other waste will likely need to be evaluated and managed as a hazardous waste, often a costly mistake. Hot-drain used-oil filters for at least 12 hours to facilitate oil recovery. Although these properly drained filters can go to the trash, generators are encouraged to recycle them.

| | |
|---|-------|
| Description of training topics covered: | |
| Date: | Time: |
| List of employees attending: | |
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For additional assistance, call KDHE at 785-296-1600 or SBEAP at 800-578-8898.

Waste Determination Documentation Form

Facility name: _____

Waste name: _____

Description process: _____

Pounds of waste generated monthly: _____

Does this waste meet the definition of solid waste?

☐ Yes

☐ No

Is this waste exempt from the definition of solid waste or hazardous waste?

☐ Yes

☐ No

Was laboratory analysis used to make this determination?

☐ Yes

☐ No

If yes, record the name and KDHE certificate number for the laboratory: _____

If yes, **attach** a copy of the analytical results to this sheet.

Was knowledge of the process used to make this decision?

☐ Yes

☐ No

If yes, list the name and date of each document (MSDS, process flow diagrams, etc.) reviewed and/or **attach** them to this sheet:

Is this waste non-hazardous?

☐ Yes

☐ No

Is this waste a listed hazardous waste?

☐ Yes

☐ No

If yes, list waste codes: _____

Is this waste a characteristic hazardous waste?

☐ Yes

☐ No

If yes, list waste codes: _____

List the name and title of the person making this determination:

Date of this determination: _____

For step-by-step guidance, visit www.kdheks.gov/waste or email kdhe.bwmweb@ks.gov for more information.

Hazardous Waste Emergency Response

EMERGENCY COORDINATOR: _____

HOME PHONE NUMBER: _____

CELL PHONE NUMBER (optional): _____

ALTERNATE: _____

HOME PHONE NUMBER: _____

CELL PHONE NUMBER (optional): _____

FIRE PHONE NUMBER (unless there is a direct alarm): _____

EQUIPMENT LOCATION

(A map showing locations is sufficient.)

FIRE EXTINGUISHERS: _____

FIRE ALARMS (if present): _____

SPILL CONTROL: _____

RESPONSE ACTION

FIRE: Call the fire department or extinguish the fire using an appropriate fire extinguisher.

SPILL: Contain the flow of hazardous waste. Clean up the hazardous waste, and any contaminated materials or soil as soon as possible.

FIRE, EXPLOSION OR RELEASE WHICH THREATENS HUMAN HEALTH OR SURFACE WATER

Notify the National Response Center with the following information:

- Name, address and US EPA ID number of generator
- Date, time and type of incident
- Quantity and type of hazardous waste involved
- Extent of any injuries
- Estimated quantity and disposition of recovered materials

NATIONAL RESPONSE CENTER: 800-424-8802

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT: 785-291-3333

KDHE DISTRICT OFFICES

Northwest District Office

2301 E. 13th Street
Hays, KS 67601-2651
785-261-6100

Southwest District Office

302 W. McArtor Road
Dodge City, KS 67801-6014
620-682-7940

South Central District Office

300 W. Douglas, Suite 700
Wichita, KS 67202-2921
316-337-6020

North Central District Office

3040 Enterprise Dr.
Salina, KS 67401-7699
785-827-9639

Northeast District Office

800 W. 24th Street
Lawrence, KS 66046-4417
785-842-4600

Southeast District Office

308 W. 14th Street
Chanute, KS 66720
620-431-2390

CONTACT INFORMATION

Bureau of Waste Management

785-296-1600 (Topeka)

kdheks.gov/waste

This bureau regulates hazardous and solid wastes to meet state (KDHE) and federal (EPA) waste management rules.

This calendar is provided by the Kansas Department of Health and Environment and the Kansas Small Business Environmental Assistance Program, working in partnership to provide you with tools and tips to help you stay in compliance, reduce waste and save money.

Call or email for confidential assistance with environmental rules.
Get more tips on reducing wastes and discuss ideas mentioned in this calendar.

Kansas State University Pollution Prevention Institute Small Business Environmental Assistance Program

Environmental Assistance Hotline

800-578-8898

www.sbeap.org • sbeap@ksu.edu

Use this calendar for recordkeeping. Keep all records for at least three years.

Paid for in part by the Kansas Department of Health and Environment (KDHE).

