



Facility name

EPA I.D. #

Generator category

# 2024 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 \_\_\_\_\_



This compliance calendar is intended to help CESQGs, KSQGs and SQGs meet regulatory requirements. Requirements for LQGs are more detailed and are not necessarily included in this compliance calendar.



Looking for training options? KDHE typically hosts basic and advanced hazardous waste classroom training events in August at the annual Kansas Environmental Conference.



# JANUARY 2024

Sun	Mon	Tues	Weds	Thurs	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

**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?



Documenting employee hazardous waste training can be easy – use the log to the right, or a similar log, each time training occurs.

## Training

Is your training up to date? With the exception of CESQGs, all generators are required to provide hazardous waste training for employees who manage or handle hazardous waste. This training must occur within six months of employee hire or position transfer, then annually thereafter.

Classroom training options are widely available and include SBEAP.org online training at [sbeap.org/node/256](http://sbeap.org/node/256). It is imperative that hazardous waste training is supplemented with facility-specific details relevant to each trainee's job duties, both under typical conditions and emergency conditions.

Employers must record who attended training, when training was held and the topics covered in training, then maintain these records for at least three years.

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



Looking to stay up to date on Kansas hazardous waste statutes and regulations? Sign up for KDHE BWM's Hazardous Waste Updates listserv at [kdhe.ks.gov/1732/Bureau-of-Waste-Management-Bulletin-List](http://kdhe.ks.gov/1732/Bureau-of-Waste-Management-Bulletin-List) or SBEAP's E-Tips Newsletter at [sbeap.org/newsletter](http://sbeap.org/newsletter).



Another way to stay up to date on Kansas regulations is to attend the annual Kansas Environmental Conference. Details can be found at [kdhe.ks.gov/895/Kansas-Environmental-Conference](http://kdhe.ks.gov/895/Kansas-Environmental-Conference).

## 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
Marked with accumulation start date	Y	N	Y	N	Y	N	Y	N
Containers properly closed	Y	N	Y	N	Y	N	Y	N
Containers in good condition	Y	N	Y	N	Y	N	Y	N
Incompatible wastes segregated	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 \_\_\_\_\_

# FEBRUARY 2024

Sun	Mon	Tues	Weds	Thurs	Fri	Sat
28	29	30	31	1	2	3
4	5	6	7	8	9	10
11	12	13	14 Valentine's Day	15	16	17
18	19 Presidents' Day	20	21	22	23	24
25	26	27	28	29	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?

It is critical to know your facility's generator category to ensure regulatory compliance. If you need help, contact SBEAP at [sbeap@k-state.edu](mailto:sbeap@k-state.edu) or 800-578-8898.



## Regulatory updates - what's new?

Prior to 2023, KSQGs were considered eligible to dispose of their hazardous waste through state Household Hazardous Waste facilities, or HHWs. However, after recent KDHE review of state legislation, the state has revised this interpretation and determined that KSQGs cannot legally dispose of hazardous waste at HHWs.

The only facilities in the state that can legally dispose of hazardous waste at HHWs are accumulating and non-accumulating CESQGs.

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

# 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 \_\_\_\_\_

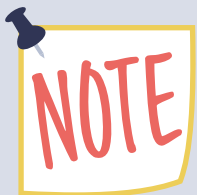
Week 2 inspected by \_\_\_\_\_

Week 3 inspected by \_\_\_\_\_

Week 4 inspected by \_\_\_\_\_



For in-depth specifics on how to make a waste determination, go to [kdhe.ks.gov/1889/Hazardous-Waste-ID-Management](http://kdhe.ks.gov/1889/Hazardous-Waste-ID-Management) and look at KDHE's "Hazardous Waste Determinations and Documentation" guidance document. For video guidance, visit SBEAP's hazardous waste webpage at [sbeap.org/waste-management/hazardous-waste](http://sbeap.org/waste-management/hazardous-waste).



All hazardous waste must first be a solid waste as defined in 40 CFR 261.4. This can be confusing as under this definition, a "solid waste" may be a solid, a liquid or even a gas.



# MARCH 2024

Sun	Mon	Tues	Weds	Thurs	Fri	Sat
25	26	27	28	29	1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
Saint Patrick's Day						
24	25	26	27	28	29	30
Easter Sunday 31	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?

If you are unable to make a hazardous waste determination using knowledge of process, you will need to send a waste sample to a KDHE-certified lab for testing. A list of these labs can be found at [kdhe.ks.gov/1286/Environmental-Laboratory-Accreditation](http://kdhe.ks.gov/1286/Environmental-Laboratory-Accreditation).



## Hazardous waste determinations

Hazardous waste determinations should be made for each solid waste generated at your facility. Most generators use “knowledge of process and the SDS” to make a determination. But if the waste needs to be tested, a KDHE-certified laboratory must be used. 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.”
4. Prepare the written documentation. This can be in an electronic format or on a hard copy like the KDHE example found at [kdhe.ks.gov/DocumentCenter/View/5427/Hazardous-Waste-Determinations-and-Documentation-PDF](http://kdhe.ks.gov/DocumentCenter/View/5427/Hazardous-Waste-Determinations-and-Documentation-PDF).

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



Electronic determinations are acceptable as long as the determinations can be produced for review during a state or federal inspection.



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

## 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 2024

Sun	Mon	Tues	Weds	Thurs	Fri	Sat
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	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?

Each solid waste generated at the facility must have a documented waste determination completed and on file.



## Hazardous waste determinations, continued

Hazardous waste determination documentation should be reviewed annually and updated as needed. If there are process or raw material changes, the new information should be recorded and new SDSs or test results included as part of the update.

Waste determination documents should be maintained on-site for a minimum of three years from the date you last shipped that particular waste off-site. A hard copy sample “waste determination” form can be found at the back of this calendar and can be photocopied to provide additional blank copies. Additional guidance can be found at [kdhe.ks.gov/1871/Policies-Guidance-Documents](http://kdhe.ks.gov/1871/Policies-Guidance-Documents).

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

# 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 \_\_\_\_\_

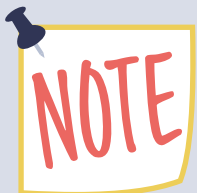
Week 2 inspected by \_\_\_\_\_

Week 3 inspected by \_\_\_\_\_

Week 4 inspected by \_\_\_\_\_



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 then it may seem like inspections were not completed.



Failure to maintain a closed container is one of the most common violations. If you use a funnel, make sure the lid locks down or is spring-loaded to ensure the container is properly closed.



# MAY 2024

Sun	Mon	Tues	Weds	Thurs	Fri	Sat
28	29	30	1	2	3	4
5	6	7	8	9	10	11
12 Mother's Day	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27 Memorial Day	28	29	30	31	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?

Containers that meet the definition of "RCRA empty" do NOT need to be managed as hazardous waste. For details, see pg. 13 of KDHE's Hazardous Waste Generator Handbook at [kdhe.ks.gov/DocumentCenter/View/4882/Hazardous-Waste-Generator-Handbook-PDF](http://kdhe.ks.gov/DocumentCenter/View/4882/Hazardous-Waste-Generator-Handbook-PDF). If you still have questions, email [sbeap@k-state.edu](mailto:sbeap@k-state.edu) or call 800-578-8898.



## Container management

Container management violations are some of the most frequently cited violations by Kansas inspectors. In fact, "failure to maintain a closed container" and "failure to label the container with the words hazardous waste" are ranked near the top on BWM's top-list of violations. In Kansas, all containers of hazardous waste must be labeled with the words "hazardous waste," be closed except when adding or removing hazardous waste, be in good condition and contents must be compatible with the container. Hazardous waste storage containers must be inspected either monthly or weekly, and generators can use these calendars to document the inspections. SBEAP has produced a short video regarding proper container management which can be viewed at [sbeap.org/waste-management/hazardous-waste](http://sbeap.org/waste-management/hazardous-waste).

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



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.



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.”

## 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 2024

Sun	Mon	Tues	Weds	Thurs	Fri	Sat
26	27	28	29	30	31	1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16 Father's Day	17	18	19 Juneteenth	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?
- How much hazardous waste is currently in storage?
- What is the oldest accumulation start date in storage?

It is highly recommended to only use containers with a capacity of 55 gallons or less as a satellite accumulation container. This will reduce potential container mismanagement by preventing the container from exceeding the 55-gallon waste limit.



## Satellite containers

Satellite accumulation containers allow all generators, except CESQGs, to accumulate their hazardous waste at or near the point of generation, which can make handling waste both easier and safer. These containers have overlapping requirements with hazardous waste storage containers: they must be labeled with the words "hazardous waste," closed except when adding or removing hazardous waste and be compatible with contents and in good condition. Satellite accumulation containers have several distinct requirements though: each must be at or near the point of generation and under control of the operator, each must not accumulate more than 55 gallons of hazardous waste or become full and there can only be one satellite container for each type of hazardous waste at a point of generation. Once these requirements are no longer met, the satellite accumulation container transitions to a hazardous waste storage container and must be labeled with the transition date (in place of accumulation start date) and then moved to a hazardous waste storage area within three days.

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

# 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 \_\_\_\_\_



Use different file folders to separate waste documents from your stormwater or air quality documents. This will help you stay organized and make it easier to find the right records in case of an inspection.



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



# JULY 2024

Sun	Mon	Tues	Weds	Thurs	Fri	Sat
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	24	25	26	27
28	29	30	31	1	2	3

**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?

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



## Recordkeeping

Good record keeping is a vital part of compliance, and often a sign that a facility is well-managed. Most hazardous waste records need to be maintained for at least three years. These include, but are not limited to, storage-area inspection logs, hazardous waste manifests and land disposal restriction notices (LDRs), training records, emergency preparedness documents, contingency plans and exception reports. Hazardous waste determination records, which may include the determination form, SDS and lab test results, need to be maintained for at least three years from the date the facility last shipped the waste off-site. Good record keeping will help you be prepared for a KDHE or EPA inspection.

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



Staying up to date on your training and required recordkeeping are some of the best ways to ensure compliance.



The frequency of a facility inspection by KDHE can vary based on size of the generator, history of compliance and complaints.

## 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 2024

Sun	Mon	Tues	Weds	Thurs	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
25	26	27	28	29	30	31

**Mark on the calendar —**

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- 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?

Want to audit your facility with the same checklists KDHE uses? You can find several under the Checklists tab at [kdhe.ks.gov/572/Solid-Hazardous-Waste-Compliance-Documen](https://kdhe.ks.gov/572/Solid-Hazardous-Waste-Compliance-Documen).



## Preparing for an inspection

Hazardous waste management regulations date back to 1976 and are known as RCRA or the Resource Conservation and Recovery Act. Note the words “resource conservation” in RCRA. Reviewing your waste streams and operations to identify opportunities to conserve resources, i.e., reduce waste, such as through process, material or technology changes, can ease compliance burdens and save facilities money. Want to reduce risk of a waste management violation further? Perform an internal audit and stay up to date on hazardous waste trainings and records. If you don’t have time or lack ideas for risk reduction, consider inviting a third party with fresh eyes to do a walkthrough at your facility. KDHE provides compliance assistance visits to eligible facilities, and SBEAP provides confidential compliance and waste minimization on-site assistance visits. These programs are provided at no charge to the facility and can help you mitigate compliance risk and possibly save money.

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

# Weekly/Monthly Inspection Log

Date (enter date a weekly or monthly inspection was conducted)										
Time										
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Marked with accumulation start date	Y	N	Y	N	Y	N	Y	N	Y	N
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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 \_\_\_\_\_

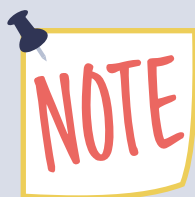
Week 2 inspected by \_\_\_\_\_

Week 3 inspected by \_\_\_\_\_

Week 4 inspected by \_\_\_\_\_



Episodic event provisions were added as part of the 2016 hazardous waste generator improvements final rule. For details, see KDHE's "Environmental Protection Agency Hazardous Waste Generator Improvements Rule" policy found in [kdhe.ks.gov/1889/Hazardous-Waste-ID-Management](http://kdhe.ks.gov/1889/Hazardous-Waste-ID-Management).



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.



# SEPTEMBER 2024

Sun	Mon	Tues	Weds	Thurs	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	1	2	3	4	5

**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?

Specifics for reporting an episodic event can be found in KDHE's 8700-12I Instructions for Notification of Regulated Waste Activity Form found in [kdhe.ks.gov/602/Hazardous-Waste-Generators-Transporters](https://www.kdhe.ks.gov/602/Hazardous-Waste-Generators-Transporters).



## 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.

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



Managing eligible hazardous wastes as universal waste can come with significant monetary and compliance advantages.



In a break from Federal regulations, Kansas does not allow aerosol cans to be considered universal waste, though this may change in the coming years. Current guidance on aerosol cans can be found at [kdhe.ks.gov/DocumentCenter/View/5415/Recycling-and-Disposal-of-Aerosol-Cans-G---PDF](http://kdhe.ks.gov/DocumentCenter/View/5415/Recycling-and-Disposal-of-Aerosol-Cans-G---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
Marked with accumulation start date	Y	N	Y	N	Y	N	Y	N
Containers properly closed	Y	N	Y	N	Y	N	Y	N
Containers in good condition	Y	N	Y	N	Y	N	Y	N
Incompatible wastes segregated	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 2024

Sun	Mon	Tues	Weds	Thurs	Fri	Sat
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	25	26
27	28	29	30	31 Halloween	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 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

Certain commonly generated hazardous wastes can be classified as “universal waste” rather than “hazardous waste.” These wastes include certain batteries (40 CFR 273.2), pesticides (40 CFR 273.3), mercury-containing equipment (40 CFR 273.4) and lamps (40 CFR 273.5). Generators of universal waste, known as “universal waste handlers,” can manage these materials in a more streamlined fashion under 40 CFR 273 Subpart B as opposed to the more stringent RCRA Subtitle C hazardous waste requirements. For example, universal wastes do not count against your generation rate and they have less restrictive container management standards. Universal waste containers must remain closed and should be appropriately labeled with the type of material and the accumulation start time. Universal waste must be sent for disposal or recycling within one year of the accumulation start date. Read more about universal waste management requirements at [kdhe.ks.gov/DocumentCenter/View/5416/Requirements-for-Handlers-of-Universal-Waste-PDF](https://kdhe.ks.gov/DocumentCenter/View/5416/Requirements-for-Handlers-of-Universal-Waste-PDF).

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

# 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
Marked with accumulation start date	Y	N	Y	N	Y	N	Y	N
Containers properly closed	Y	N	Y	N	Y	N	Y	N
Containers in good condition	Y	N	Y	N	Y	N	Y	N
Incompatible wastes segregated	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 \_\_\_\_\_

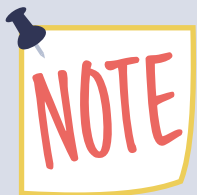
Week 2 inspected by \_\_\_\_\_

Week 3 inspected by \_\_\_\_\_

Week 4 inspected by \_\_\_\_\_



Medical waste can be managed as a special waste, but pharmaceutical waste cannot. Pharmaceutical waste should be managed according to KDHE's guidance, found at [kdhe.ks.gov/DocumentCenter/View/5451/Disposal-Options-for-Expired-or-Surplus-MedicationsPharmaceuticals-G---PDF](http://kdhe.ks.gov/DocumentCenter/View/5451/Disposal-Options-for-Expired-or-Surplus-MedicationsPharmaceuticals-G---PDF).



KDHE's Special Waste Disposal Request form can be found at [kdhe.ks.gov/DocumentCenter/View/4983/Special-Waste-Disposal-Request-PDF](http://kdhe.ks.gov/DocumentCenter/View/4983/Special-Waste-Disposal-Request-PDF).



# NOVEMBER 2024

Sun	Mon	Tues	Weds	Thurs	Fri	Sat
27	28	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
24	25	26	27	28 Thanksgiving	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?

Many facilities analyze their spent paint filters to document whether or not the filters can be managed as "special waste" instead of hazardous waste, saving hundreds in disposal costs.



## Special and medical waste

"Special waste" is waste that is not RCRA hazardous but, because of physical, chemical or biological characteristics, requires special handling or management. Examples of special wastes may include spent paint filters, large industrial waste materials that can't be recycled, some sludges, non-medical sharps, asbestos or even medical waste meeting certain standards. Special wastes are hauled to the landfill or transfer station separately with a special waste authorization. The application process for the authorization is simple. You can find a link to the form in the Note box above. Medical waste is generated in connection with human and/or animal care, which is capable of causing disease or injury. Medical wastes must be placed in red containers or bags, or the container must be labeled "biohazard." Containers must be closeable, constructed to prevent leakage and closed prior to removal. Medical waste can be managed in one of five ways including as a special waste. Read more at [kdhe.ks.gov/DocumentCenter/View/5431/Medical-Waste-Management-G---PDF](http://kdhe.ks.gov/DocumentCenter/View/5431/Medical-Waste-Management-G---PDF).

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

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



Having problems with solvent recovery optimization? SBEAP may be able to help. Call 800-578-8898 or email [sbeap@k-state.edu](mailto:sbeap@k-state.edu) for assistance.



Solvent distillation reduces raw material needs and hazardous waste generation, but it requires careful tracking. Learn more at [kdhe.ks.gov/DocumentCenter/View/5426/ Determining-the-Hazardous-Waste-Generation- Rate-for-On-Site-Solvent-Recycling-G---PDF](http://kdhe.ks.gov/DocumentCenter/View/5426/Determining-the-Hazardous-Waste-Generation-Rate-for-On-Site-Solvent-Recycling-G---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 \_\_\_\_\_



# DECEMBER 2024

Sun	Mon	Tues	Weds	Thurs	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 Christmas Eve	25 Christmas Day	26	27	28
29	30	31 New Year's Eve	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?

Many facilities that use solvents also generate solvent-contaminated wipes. These wipes can sometimes be excluded from RCRA Subtitle C regulations. To find out if this exclusion applies to you, contact SBEAP or follow KDHE's guidance at [kdhe.ks.gov/DocumentCenter/View/5418/Solvent-Contaminated-Wipes-G---PDF](https://kdhe.ks.gov/DocumentCenter/View/5418/Solvent-Contaminated-Wipes-G---PDF).



## Solvent recycling

Recycling spent solvent on-site can be a great way for a facility to reduce raw materials, waste, save money and decrease their environmental impacts. There are two handling methods generators can follow to recycle spent solvents. The first method is to directly transfer spent solvents to a distillation unit without prior storage or accumulation. In this case, the spent solvent does not need to be counted as hazardous waste and is not subject to container management requirements. The second method is to store and accumulate spent solvent prior to recycling. In this case, the stored solvent is considered a hazardous waste and is subject to all typical container management requirements. As such, this waste must be included in hazardous waste generator monthly generation data, which can be tricky to track due to the cyclical nature of recycling. An easy way to assess this waste is to count the waste solvent each time it is distilled and not count the resultant still bottoms, though this method can overestimate waste generation rates. See the link to KDHE guidance in the tip below for details on how to more accurately account for spent solvent hazardous waste.

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

# 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 [kdhe.ks.gov/168/Waste](http://kdhe.ks.gov/168/Waste) or email [kdhe.bwmweb@ks.gov](mailto: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

### North Central District Office

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

### Northeast District Office

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

### 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

### Southeast District Office

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

## CONTACT INFORMATION

### Bureau of Waste Management

785-296-1600 • [kdhe.ks.gov/168/Waste](http://kdhe.ks.gov/168/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.

### Kansas State University Pollution Prevention Institute Small Business Environmental Assistance Program

800-578-8898 • [www.sbeap.org](http://www.sbeap.org) • [sbeap@ksu.edu](mailto:sbeap@ksu.edu)

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



*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).*

