



Step 10: Keep Hazardous Waste Records

Guidance for Minnesota hazardous waste generators

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Documenting compliance

Improperly managing hazardous waste can increase business costs and could risk the health of you and your employees. The best way to document your compliance with hazardous waste management requirements is through proper recordkeeping.

General record-keeping practices

Hazardous waste records, or at least a copy of the records, must either

- be kept at the site of generation or
- if electronic, be accessible from the site of generation.

Whether records are in hard copy or electronic form, you must be able, without notice, to make them available for inspection at the waste generation site.

Maintain records in legible condition.

Required records

Hazardous waste generators must maintain these records.

All generators

- **All documentation used to evaluate the generator's wastes.**
Examples: product technical literature, analytical test results, and manufacturer certifications. If an evaluation was performed by a third party, such as a consultant or a transporter, you must have the documented rationale they used to evaluate the waste; the final conclusion

alone is not sufficient. For more information on documenting waste evaluations, see Minnesota Pollution Control Agency (MPCA) hazardous waste fact sheet #1.01, [Evaluate Waste](#), available at www.pca.state.mn.us/publications/w-hw1-01.pdf.

- **Hazardous waste manifests and manifest-exception reports.**
For more information on hazardous waste manifests, see MPCA hazardous waste fact sheet #1.07, [Manifest Shipments of Hazardous Waste](#), available at www.pca.state.mn.us/publications/w-hw1-07.pdf.
- **Shipping records for used oil and used oil-related waste.**
Examples: used oil filters and sorbents.
- **Any hazardous waste shipping records allowed in lieu of a manifest.**
Examples: Very Small Quantity Generator Collection Program (VSQGCP) receipts, laundered hazardous waste sorbents shipping records.
- **Hazardous waste license applications and supplementary license information.**
Examples: feedstock or byproduct management plans.
- **Weekly inspection logs for hazardous waste containers.**
For more information on weekly container inspections, see MPCA hazardous waste fact sheet #2.41, [Documenting Container Inspections](#), available at www.pca.state.mn.us/publications/w-hw2-41.pdf.

To access hazardous waste documents on the Minnesota Pollution Control Agency Web site, www.pca.state.mn.us,

1. Click on [Waste](#) on the menu bar.
2. On the pop-up submenu, click on [Publications](#).
3. On the Waste-related Publications page, click on [Hazardous Waste Publications](#).

Small and Large Quantity Generators

In addition to the documents discussed above, Small and Large Quantity Generators (SQGs & LQGs) must also maintain the following records:

- **Employee hazardous waste training documentation.**
For more information on employee training requirements and documentation, see MPCA hazardous waste fact sheets #1.09b, [Personnel Training for Small Quantity Generators](#), and #1.09c, [Personnel Training for Large Quantity Generators](#), available on the MPCA's [hazardous waste publications](#) Web page.
- **Emergency planning documentation.**
Document arrangements with emergency responders or attempts to make such arrangements.
- **Land Disposal Restriction (LDR) notification forms.**

Recommended records

MPCA and metropolitan county hazardous waste staffs recommend that hazardous waste generators also maintain the following records:

- Hazardous waste spill and cleanup records.
- Certificates of Destruction or Certificates of Recycling, if your waste management vendors provide you with them.
- Logs or copies of correspondence with hazardous waste regulatory agencies regarding interpretations or policy clarifications applicable to your site.

Record retention

The requirement for most hazardous waste records discussed above is to keep them for at least three years from the date of the document; however, these have longer retention requirements:

- Keep **waste-evaluation records** for three years from the last date the specific waste was shipped from the generation site.
- Keep **training records** for three years from the date of termination of the employee.
- Keep logs or copies of any correspondence with hazardous waste regulatory agencies regarding **interpretations or policy clarifications** applicable to your site.

If you purchase an ongoing business, obtain the relevant hazardous waste records from the previous owner and keep them for the same retention duration. If you are

unable to obtain these records, document your attempts to acquire them.

Pollution prevention opportunities

A good record keeping system can help you determine the various sources of waste generation and provide information to help you determine the most feasible pollution prevention practices to implement. The Minnesota Technical Assistance Program provides free technical assistance to help businesses reduce waste, increase efficiency, save on disposal and raw material costs, and decrease regulatory compliance burdens. See contact information below.

More information

Your metropolitan county and the MPCA have staff available to answer waste management and record-keeping questions. For more information, contact your metropolitan county hazardous waste office or your nearest MPCA regional hazardous waste staff.

Metro County Hazardous Waste Offices

Anoka	763-422-7093
Carver	952-361-1800
Dakota	952-891-7557
Hennepin	612-348-3777
Ramsey	651-266-1199
Scott	952-496-8475
Washington	651-430-6655
Web sites	www.co.[county].mn.us

Minnesota Pollution Control Agency

Toll free (all offices)	1-800-657-3864
Brainerd	218-828-2492
Detroit Lakes	218-847-1519
Duluth	218-723-4660
Mankato	507-389-5977
Marshall	507-537-7146
Rochester	507-285-7343
St. Paul	651-296-6300
Willmar	320-214-3786
Web site	www.pca.state.mn.us

Minnesota Technical Assistance Program

Toll free	1-800-247-0015
Metro area	612-624-1300
Web site	www.mntap.umn.edu