

Recordkeeping for Beginners



Record Retention Challenges Water and Wastewater Systems

Imagine this scenario: A small town in Kansas hires a new city clerk. He/she has been employed for less than two weeks and receives a phone call from the Kansas Department of Health and Environment (KDHE). They are coming to conduct a sanitary survey (inspection) of the city's water system. The inspector provides a long list of records that will need to be available for review. The clerk has no idea where to locate these records among the piles of papers and files at city hall. As a result of the sanitary survey, the city is cited by KDHE for multiple deficiencies for failure to maintain a variety of records. Sound familiar?

Organizing water records may seem like a tedious task, especially if you are new to a position and are not familiar with water terminology or acronyms. But there is actually a very easy way of organizing water records and knowing the required retention time. All that's needed is a three-ring binder!

A few years ago, a KDHE inspector introduced me to a document that can be printed and inserted into a three-ring binder. The document includes a cover page, an index, and multiple section dividers. Each section divider describes a specific category of records, the required retention time, and the regulatory citation which requires the record retention. It's an easy way to know what records need to be kept and for how long.

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File cabinets in city halls and rural water system offices are often overflowing with reports and surveys of water and wastewater utilities.

Recordkeeping requirements vary depending on the type of water system.

Keep for 3 Years

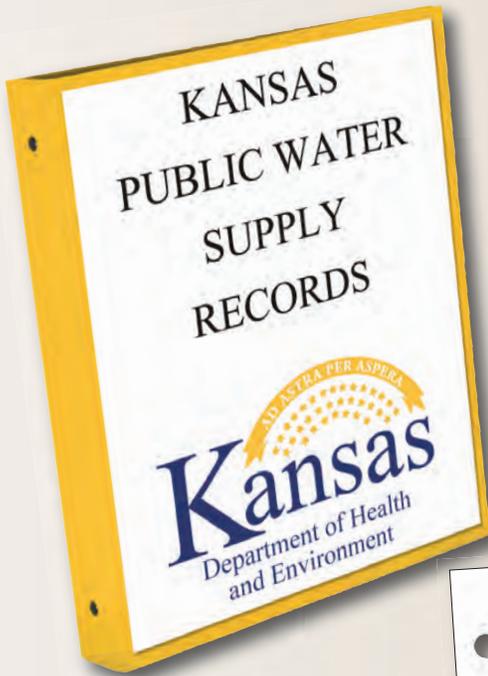
- Consumer Confidence Reports (annual report to customers)
- Public Notices
- Efforts to correct violations
- Individual Filter Effluent (IFE) Turbidity Measurements (Surface Water Treatment Systems)*
- Results of Initial Round and Second Round of Source Water Monitoring (Surface Water Treatment Systems)*

Keep for 5 Years

- Bacteriological Sampling Plan (update annually)
- Bacteriological Sampling Log
- Bacteriological Sampling Results

Keep for 10 Years

- Daily Chlorine Residuals
- Total Trihalomethanes (TTHMs), Haloacetic Acids (HAA5s), Maximum Residual Disinfection Level (MRDL) Chlorine Residual Sample Results



Below is an example of one of the recordkeeping sections – Section 3: Bacteriological Sampling Results. Note the required record retention time is five years, which is indicated near the bottom of the page.



All required records can be easily organized and maintained in one three-ring binder.

What about wastewater records?

Keep for 3 Years

- Records of analysis
- Calibration and maintenance of instruments*

Keep for 5 Years

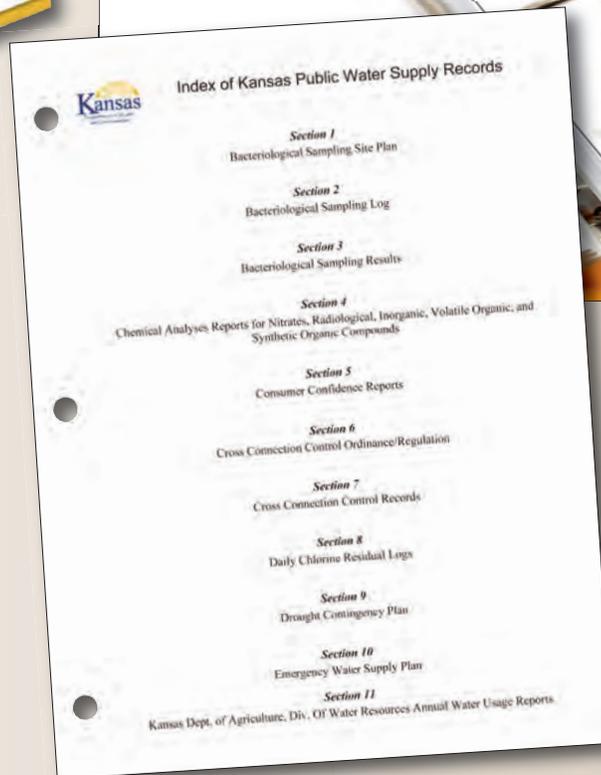
- Biosolids/sludge records*

* Indicates records that are not required of non-discharging permit holders.

- Chemical Analysis Reports (Nitrate, Radiological, Inorganic, Volatile Organic, and Synthetic Organic Compounds)*
- Stage 1 & Stage 2 Disinfection Byproducts Monitoring Plan
- KDHE Sanitary Survey Reports

Keep for 12 Years

- Lead and Copper Monitoring Plan (update every monitoring period)
- Lead and Copper Monitoring Results



Page one of a two-page index that lists each of the recordkeeping sections.

Keep Indefinitely

- Emergency Water Supply Plan
- Disinfection Profiling and Benchmarking (Surface Water Treatment Systems)*

* Indicates records that are not required of purchasing water systems (water systems that do not have their own source of raw water; receive treated water from another public water system).

Do you need assistance with getting your water records organized? Contact KRWA staff member, Monica Wurtz at (785) 262-7301 or monica@krwa.net.

Monica Wurtz began work with KRWA in October 2013. She previously worked at the Kansas Department of Health and Environment and also worked at US EPA Region 7 for four years. Monica is considered a national expert on various drinking water regulations.

