



Environmental audit checklists are designed to assist businesses by providing a low cost way of reviewing compliance with Minnesota's environmental laws and rules. Because the laws and rules are numerous and often complicated, this checklist cannot be a complete guide to your legal obligations. You may have obligations that are not covered on this checklist. If you have questions regarding the Environmental Audit Program or this checklist, please call the Small Business Environmental Assistance Program (SBEAP) at 651-282-6143 or 800-657-3938.

Date of audit \_\_\_\_\_

Company \_\_\_\_\_

Completed by/Title \_\_\_\_\_

## Environmental Audit Program Participation

A check mark in any of the boxes indicating that a requirement is not being met designates a violation of one or more regulations. To participate in the Environmental Audit Program, submit a report of your findings to the Minnesota Pollution Control Agency (MPCA). The Report Inventory form lists items that need to be included in the report and meets the audit report requirements. You do not need to submit a copy of this checklist.

Answer each question unless specifically directed otherwise.

**1. Have you evaluated all of your wastes to determine if any are hazardous?** (Spent cleaning solvents, paints, and thinners waste are usually hazardous waste.)

☐ Yes Continue to the next question.

☐ No

- If you do collision or automotive repair, you probably generate hazardous waste.
- You need to thoroughly evaluate all of your wastes to determine if any are hazardous. Complete the rest of these checklists that apply to your shop. This will help you decide if any of your wastes are hazardous wastes.
- For help with waste evaluation, call SBEAP at 651-282-6143 or 800-657-3938 and request Hazardous Waste fact sheet # 1.01, *Step 1: Evaluate Waste; Determine Generator Size*. You can also find this fact sheet online at: <http://www.pca.state.mn.us/publications/w-hw1-01.pdf>.
- For further help, contact SBEAP or your county hazardous waste inspection staff as appropriate.

**2. Do you generate hazardous waste?**

☐ Yes Continue to the next question.

☐ No Stop here. You do not need to complete this checklist.

**Hint:** You can consider waste from your shop to be a sign of some inefficiency. Of course, no shop operation is perfect, but waste and wasteful practices need to be kept to a minimum in order to remain competitive.

**3. Do you know your hazardous waste generator size?**

☐ Yes Use the table below to confirm your hazardous waste generator size.

☐ No Use the table below to determine your hazardous waste generator size.

Amount of hazardous waste generated	Size
220 pounds or less per month (about ½ drum or less of liquid)	Very small quantity generator (VSQG)
More than 220 pounds but less than 2200 pounds per month (about ½ to 4 drums of liquid)	Small quantity generator (SQG)
2200 pounds or more per month (about 4 drums of liquid or more)	Large quantity generator (LQG)

**Hint:** Many compliance requirements are tied to your generator size; VSQGs have fewer requirements than SQGs. The key is to be the smallest generator in your size category - at the lowest end of your range. You may be able to reduce your size simply by making longer use of your materials, like parts washer solvent. Don't make premature waste out of usable materials.

## Reporting/Licensing

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**4. Does your shop have a Waste (also called Environmental Protection Agency) Identification (ID) number?**

- ☐ Yes You meet this requirement.
- ☐ No You are not meeting this requirement. Call SBEAP and ask for Hazardous Waste fact sheet #1.02, *Step 2: Obtain a Waste Identification Number*, and for the Notification of Regulated Waste Activity instructions and form. Or find them at: <http://www.pca.state.mn.us/publications/w-hw1-02.pdf>  
<http://www.pca.state.mn.us/publications/w-hw7-08.pdf>  
<http://www.pca.state.mn.us/publications/w-hw7-09.pdf>

**5. Do you generate 100 pounds or more of hazardous waste per year?**

- ☐ Yes  
Unless you have already done so, you must meet these requirements:
- You need to obtain a Hazardous Waste Generator License, report your hazardous waste generation annually, and pay fees for your license and/or hazardous waste generation.
  - If your shop is located in Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, or Washington County, contact your county hazardous waste staff directly for hazardous waste licensing materials.
  - If your shop is located in any other Minnesota county, the MPCA, after receiving your request for a Waste ID number, will automatically send you hazardous waste licensing materials at the time of the next licensing cycle.
- ☐ No You may have to meet these requirements:
- If your shop is located in Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, or Washington County, contact your county hazardous waste staff to see if you must obtain a Hazardous Waste Generator License, report your hazardous waste generation annually or pay a fee for this license or your hazardous waste generation. They can supply you with any needed licensing materials and information about your hazardous waste management requirements.
  - If your shop is located in any other county in Minnesota, you do **not** need to obtain a Hazardous Waste Generator License, report your hazardous waste generation annually, or pay a fee for your hazardous waste generation. Call SBEAP and ask for Hazardous Waste fact sheet #1.50, *Requirements for Minimal Quantity Generators*. Or find it online at: <http://www.pca.state.mn.us/publications/w-hw1-50.pdf>. **Skip to question 9.**

**6. Is your hazardous waste generator license posted in a public area?**

- ☐ Yes You meet this requirement.
- ☐ No You are not meeting this requirement.

**7. Do you report the information requested annually by your county hazardous waste office or the MPCA describing your hazardous waste generation?** (This report is sent to you automatically once you have a hazardous waste license.)

- ☐ Yes You meet this requirement.
- ☐ No You are not meeting this requirement.

**8. Do you pay the hazardous waste license or generation fee(s) that's billed to you?**

- ☐ Yes You meet this requirement.
- ☐ No You are not meeting this requirement.

**9. Has your business changed locations or are you anticipating a move?**

- ☐ Yes
- A Waste (EPA) ID number for the new location is required. These numbers are not transferable. Call SBEAP to request the Hazardous Waste fact sheet #1.02, *Step 2: Obtain a Waste Identification Number*, and the *Notification of Regulated Waste Activity* instructions and form. Or find them at: <http://www.pca.state.mn.us/publications/w-hw1-02.pdf>  
<http://www.pca.state.mn.us/publications/w-hw7-08.pdf>  
<http://www.pca.state.mn.us/publications/w-hw7-09.pdf>
  - Check the *First Notification* box on the form. This indicates that you are requesting a number for your new location. Complete and submit the form.
  - If you need a Hazardous Waste Generator License, one is required for the new location. These licenses are not transferable.
  - If your shop is located in Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, or Washington County, contact your county hazardous waste staff directly and they will send you hazardous waste licensing materials.
  - If your shop is located in any other MN county the MPCA, after receiving your request for a Waste ID number, will automatically send you hazardous waste licensing materials at the time of the next licensing cycle.
  - If you no longer occupy your old location, you must send in a notification to inactivate your old number. Check the *Inactivation* box on the form. Complete and submit the form.
- ☐ No Continue to next question.

**10. Has your business changed its name or ownership or are you anticipating either of these changes?**

- ☐ Yes
- Give notification of these changes. Call SBEAP for Hazardous Waste fact sheet #1.02, *Step 2: Obtain a Waste Identification Number*, and the *Notification of Regulated Waste Activity* instructions and form. Or see them online at: <http://www.pca.state.mn.us/publications/w-hw1-02.pdf>  
<http://www.pca.state.mn.us/publications/w-hw7-08.pdf>  
<http://www.pca.state.mn.us/publications/w-hw7-09.pdf>
  - Check the *Subsequent Notification* box on the form. Complete and submit the form.
  - If you complete an Annual Report of Hazardous Waste Generation, include these changes in your report.
- ☐ No      Continue to next question.

## Burning

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**11. Are you burning any hazardous wastes?**

- ☐ Yes
- In most cases, the burning of hazardous wastes is not allowed. Cease this practice until you have determined if it is acceptable.
  - Call SBEAP or your county hazardous waste staff as appropriate, for more information and assistance.
- ☐ No      Continue to next question.

## Storage

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**12. Do you store all your hazardous wastes in sturdy, leak-proof containers, which are compatible with the wastes?**

- ☐ Yes      You meet this requirement.
- ☐ No      You are not meeting this requirement.
- Often the original container of the material makes a good container for its waste.
  - Call SBEAP for Hazardous Waste fact sheet #1.04/1.05, *Steps 4 & 5: Mark and Store Hazardous Waste Correctly*. Or find it online at: <http://www.pca.state.mn.us/waste/pubs/1-041-05.pdf>.

**13. Do you keep containers closed except when adding or removing waste?** (A closed container means the bung is screwed in or the snap ring is closed. An open funnel in a drum is an open container.)

- ☐ Yes      You meet this requirement.
- ☐ No      You are not meeting this requirement.

**14. Do you maintain enough aisle space in your waste storage area to provide visibility and access for conducting inspections, cleaning up spills, and passage of emergency equipment or personnel?**

- ☐ Yes      You meet this requirement.
- ☐ No      You are not meeting this requirement.

**15. If physically possible, are ignitable materials stored at least 50 feet from the property line?** (Ignitable materials have a flash point below 140° Fahrenheit [60° Celsius]. Check Material Safety Data Sheets for this information.)

- ☐ Yes      You meet this requirement.
- ☐ No      You are not meeting this requirement.

**16. Do you inspect containers weekly for leaks and document these inspections?**

- ☐ Yes      You meet this requirement.
- ☐ No
- The only case in which you would **not** need to be documenting these inspections would be if the storage area is in the immediate working area of the process generating the waste and under the control of the operator of this process so that he or she can visually inspect the area on a regular basis. (This type of storage area is discussed further in question 19, which outlines satellite accumulation.)
  - In all other cases you must conduct and document weekly inspections.
  - Use the log sheets available on SBEAP's Automotive Compliance Calendar. Call SBEAP for a copy or go online to: <http://www.pca.state.mn.us/publications/ea-s1-50.pdf>.

## Indoor storage

### 17. If you store hazardous waste indoors, do you:

- store containers in an area without floor drains?
- store waste containing free liquids on an impermeable surface?
- meet fire and building codes?
- ☐ Yes You meet all of the above requirements.
- ☐ No You are not meeting all of the above requirements. For fire and building code questions contact the state fire marshal at 651-215-0500, or your local fire marshal and building code inspector

## Outdoor storage

### 18. If you store hazardous waste outdoors do you:

- store waste containing free liquids on a *curbed*, impermeable surface?
- protect waste from inadvertent damage?
- restrict access to those persons responsible for the waste?
- shade ignitable wastes from direct sunlight?
- store waste in an area with overhead roofing or other covering that does not obstruct the visibility of the labels, **if** exposure to moisture or sunlight could create a hazard or adversely affect the container's ability to hold a particular hazardous waste?
- ☐ Yes You meet all the above requirements.
- ☐ No You are not meeting all the above requirements.

## Satellite accumulation

### 19. Do you have a particular hazardous waste that accumulates slowly?

- ☐ Yes Follow the satellite accumulation guidance below to have a less restrictive storage time limit.
- Limit accumulation to 55 gallons for this particular hazardous waste.
- Mark the container with the date you first add waste (start date) and the date the container becomes full (fill date). **The storage time clock for this waste begins on the fill date.**
- Move the container to your permanent hazardous waste storage location within three days of the fill date.
- If the container is located in the immediate area where the waste is generated, so that the process operators have direct control over the area and can visually inspect it, you **do not need to document** your weekly inspections of the waste stored in this satellite accumulation container.
- If the container is not located in the immediate working area, you **do need to document** your weekly inspections of this waste.
- ☐ No Continue to next question.

**Hint:** The storage requirements show you the need for control of your generated waste. These are important rules, because it makes your job easier. Think about the hassles, expense, labor, and lost productivity involved in cleaning up, repairing, replacing, or even excavating problems due to out of control waste storage.

## Marking

### 20. Do you mark your hazardous waste containers with the words "Hazardous Waste", a description of the waste, and the date you first put waste in the container (an accumulation start date)?

- ☐ Yes You meet this requirement.
- ☐ No You are not meeting this requirement.

## Accumulation limits

### 21. Do you limit waste accumulation to your generator size allowance before off-site shipment?

Size	Accumulation limits
VSQG	2200 pounds (about 4 drums of liquid)
SQG	6600 pounds (about 12 drums of liquid)
LQG	No limit

- ☐ Yes You meet this requirement.
- ☐ No You are not meeting this requirement.

## Storage time limits

### 22. Do you ship waste under the time limits for your generator size requirements?

Size	Hazardous waste storage time limits
VSQG	Accumulation limit is 2200 pounds. Make arrangements to ship before this limit is reached. If limit is exceeded, follow SQG rules.
SQG	Ship stored waste within 180* days of the date waste was first put into the container. (It is possible to apply for a 90 day extension.)
LQG	Ship within 90 days of the date waste was first put into the container unless a storage facility permit is obtained.

\*This is extended to 270 days if you are shipping to a facility located more than 200 miles away.

- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement.

## Shipping

### 23. Do you prepare your hazardous waste for shipment in the following manner?

- The waste is in a Minnesota Department of Transportation (MNDOT) approved shipping container.
  - There is a completed pre-transport label on the container.
  - The container displays necessary MNDOT hazard labels.
- ☐ Yes    You meet all of the above requirements. Continue to next question.
- ☐ No    You are not meeting all of the above requirements. Call SBEAP for Hazardous Waste fact sheet # 1.06, *Transport and Dispose of Hazardous Waste Correctly*. Or go online to <http://www.pca.state.mn.us/waste/pubs/1-06.pdf>.
- For questions about shipping, call MNDOT at 651-215-6300; ask for a hazardous materials staffer.

### 24. Do you transport your own hazardous waste to a VSQG collection program site?

- ☐ Yes

You must meet all of these requirements:

- be a VSQG
- apply for and get approval from the VSQG collection program you intend to use
- have or apply for a Waste ID number
- only transport waste from your business in your business vehicle
- prepare the waste properly for shipping (correct container, labels with proper markings)
- use a shipping paper (instead of a manifest)
- secure the waste in your vehicle
- hold on to your receipts for at least three years to document proper disposal of the waste (For protection from future liability, we recommend that you never discard them.)
- For more detail and a list of collection sites, call SBEAP for Hazardous Waste fact sheets #2.51 and #2.54p, *VSQG Collection Program Requirements for Generators and Transportation Guidelines for VSQG Collection Programs*. Or find them at: <http://www.pca.state.mn.us/publications/w-hw2-51.pdf>  
<http://www.pca.state.mn.us/publications/w-hw2-54p.pdf>

- ☐ No    Continue to next question.

### 25. If you ship with a hazardous waste hauler, does your hauler:

- have a license from MNDOT?
  - provide employees with proper training for hauling hazardous waste?
  - maintain adequate liability insurance?
  - transport your hazardous waste to a permitted facility?
- ☐ Yes    Your transporter meets all of the above hazardous waste hauler requirements.
- ☐ No    Your hauler is not meeting all of the above requirements.
- For questions about haulers, call MNDOT at 651-215-6300; ask for a hazardous materials staffer.

**26. If you ship with a hazardous waste transporter, have all your employees who prepare hazardous waste for transport received security awareness training?**

- ☐ Yes    You meet this security requirement.  
☐ No

- All hazmat employees must receive security awareness training. All new hazmat employees must receive security awareness training as part of their 90 day initial hazardous materials training. For questions about this security rule, call MNDOT at 651-215-6330; ask for a hazardous materials staffer.

**Hazmat Employer** means a person or business who uses one or more employees to:

- transport hazardous material (HM) in commerce
- causes HM to be transported or shipped in commerce
- represents, marks, certifies, sells, offers, manufactures, reconditions, tests, repairs, or modifies containers, drums, or packages as qualified for use in the transportation of HM

**Hazmat Employee** means a person employed by a hazmat employer who in the course of employment **directly affects** HM transportation safety. This includes an individual, including a self employed individual, who in the course of employment does any of these activities:

- loads, unloads, or handles HM
- manufactures, tests, reconditions, repairs, modifies, marks, or otherwise represents packaging as qualified for use in transportation of HM
- prepares HM for transportation
- is responsible for safety of transporting HM
- is responsible for filling out HM shipping documents
- operates a vehicle used to transport HM

**27. Are you required to be registered with the U.S. DOT as a HazMat shipper/officer?** (If placarding is required, then registration is required. If you ship paint thinner waste with a bulk carrier [at least 3500 gallons capacity], or three drums of a flammable liquid, placarding is required, and so is registration.)

- ☐ Yes
- You must develop and adhere to a security plan and provide in-depth security training.
  - You can find a fact sheet describing these requirements at:  
[http://www.dot.state.mn.us/cvo/factsheets/hazmat\\_security.pdf](http://www.dot.state.mn.us/cvo/factsheets/hazmat_security.pdf)  
[http://www.dot.state.mn.us/cvo/factsheets/hm1\\_2.pdf](http://www.dot.state.mn.us/cvo/factsheets/hm1_2.pdf)
  - You can find training information at: <http://www.dot.state.mn.us/cvo/mcr/MnTruckReg.pdf>.
  - You can find a security template for risk management at: [http://hazmat.dot.gov/riskmgmt/hmt/hmt\\_security.htm](http://hazmat.dot.gov/riskmgmt/hmt/hmt_security.htm).
- ☐ No    Continue to the next question.

## Manifests

**28. If you use a hazardous waste hauler, do you send an EPA Uniform Manifest, with a preprinted manifest number, to accompany your shipment of hazardous wastes?**

- ☐ Yes    You meet this requirement.  
☐ No    You are not meeting this requirement. Call SBEAP for Hazardous Waste fact sheet # 1.07, *Step 7: Manifest Shipments of Hazardous Waste*. Or find it at: <http://www.pca.state.mn.us/publications/w-hw1-07.pdf>.

**29. If you fill out a manifest or your transporter fills it out for you, do you ensure that it is filled out accurately and completely?**

- ☐ Yes    Your manifest meets this requirement.  
☐ No    Your manifest does not meet this requirement.

**30. Is your business located in a county in Minnesota other than Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, or Washington and does it qualify as a VSQG?**

- ☐ Yes    You must retain the initial and final pages of your manifest for your records. **Skip to question 33.**  
☐ No    Continue to next question.

**31. If you ship waste with a manifest, do you send a copy of the initial and final pages of the manifest to the applicable address?**

*For VSQGs in Scott County:*

Scott County Environmental Health  
200 Fourth Avenue West  
Shakopee, MN 55379-1220

*For VSQGs in Anoka, Carver, Dakota, Hennepin, Ramsey, or Washington Counties:*

Hazardous Waste Manifest Program  
Mail Code 609  
300 South 6<sup>th</sup> Street  
Minneapolis, MN 55487

*For all Minnesota SQGs and LQGs:*

MPCA ATTN: HWIMS  
520 Lafayette Road North  
St. Paul, MN 55155-4194

- ☐ Yes    You meet this requirement.  
☐ No    You are not meeting this requirement.

**32. Do you send copies of manifest pages to the appropriate authority within the proper time frame?**

- Within five days of shipment, do you send a copy of the initial page of the manifest to the appropriate Minnesota regulatory agency?
- Within five days of shipment, do you send a copy of the initial page to the receiving state if required?
- Within 40 days of the date the waste was accepted at the facility, do you send a copy of the final page of the manifest to the appropriate Minnesota regulatory agency?

- ☐ Yes    You meet all of the above requirements.  
☐ No    You are not meeting all of the above requirements.

**33. If you do not receive a facility-signature page back from the facility, do you:**

- Within 35 days of shipment, call the facility and check on the status of your waste (you may also want to call your transporter)?
- Within 45 days of shipment, notify the MPCA in writing regarding this manifest? (This is called making an exception report.)

- ☐ Yes    You meet both requirements.  
☐ No    You are not meeting both requirements.

## Record Keeping

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**34. Do you retain these hazardous waste records for at least three years? (For protection from future liability, we recommend that you never discard them.)**

- receipts from a VSQG Collection Program
- each initial page of the manifest signed by the generator and transporter
- each final page of the manifest signed by the facility
- manifest exception reports (if you never receive a final page from the facility, the initial page signed by you and the transporter becomes your official record)
- weekly inspection logs
- license applications and annual reports of generation
- waste evaluations and laboratory analysis

- ☐ Yes    You meet all of the above requirements.  
☐ No    You are not meeting all the above requirements.



## Emergency Planning

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**35. Do you set up and follow procedures to minimize the possibility of accidents which could threaten human health and/or the environment?**

- ☐ Yes You meet this requirement.
- ☐ No You are not meeting this requirement. Call SBEAP for Hazardous Waste fact sheet: # 1.08a, *Step 8: Emergency Planning for Very Small Quantity Generators*, or #1.08b, *Step 8: Emergency Planning for Small Quantity Generators*, or #1.08c, *Step 8: Plan for Emergencies - Contingency Plan for Large Quantity Generators*. Or find them at: <http://www.pca.state.mn.us/publications/w-hw1-08a.pdf>  
<http://www.pca.state.mn.us/publications/w-hw1-08b.pdf>  
<http://www.pca.state.mn.us/publications/w-hw1-08c.pdf>

**36. Is the following available on site?**

- internal communications or alarm system to provide emergency instructions to all your personnel (for small shops verbal communication may be acceptable)
  - immediate access to communications for employees working in a closed-door storage room
  - emergency telephone or device to call outside emergency responders
  - fire protection equipment (e.g. fire extinguishers)
  - water supply at adequate volume and pressure to meet fire protection needs
  - adequate spill control equipment
  - decontamination equipment
- ☐ Yes You meet all of the above requirements.
- ☐ No You are not meeting all of the above requirements.

**37. Is emergency equipment tested and maintained?**

- ☐ Yes You meet this requirement.
- ☐ No You are not meeting this requirement.

**38. If you have a release of any substance that may cause pollution of the air, land, or water, do you report the incident immediately to the Minnesota Duty Officer?** (*When reporting, always ask the officer on duty for guidance about whether you need to contact the National Response Center at 800-424-8802.*)

- ☐ Yes You meet this requirement.
- ☐ No You are not meeting this requirement. Report any past spills that have gone unreported.
- The Minnesota Duty Officer is available 24 hours a day and can be reached at 651-649-5451 or 800-422-0798.

VSQGs Stop Here  
For SQGs and LQGs Only

**39. Have you made arrangements with local authorities/responders in the event of an emergency, and have the arrangements been documented?**

- ☐ Yes You meet this requirement.
- ☐ No You are not meeting this requirement.
- SQGs: call SBEAP for Hazardous Waste fact sheet #1.08b, *Step 8: Emergency Planning for SQGs*, or find it at: <http://www.pca.state.mn.us/publications/w-hw1-08b.pdf>.
  - LQG: for Hazardous Waste fact sheet #1.08c, *Step 8: Plan for Emergencies - Contingency Plan for Large Quantity Generators*, visit the MPCA Web site at: <http://www.pca.state.mn.us/publications/w-hw1-08c.pdf>.

### Land disposal restrictions

**40. If you have a Land Disposal Restricted (LDR) waste (for example, a solvent or paint related hazardous waste), do you:**

- Send a properly completed LDR Notification or Certification with the initial waste shipment, and keep a copy for at least three years? (For protection from future liability, we recommend that you never discard these copies.) You do not need to send LDR forms with subsequent shipments unless the waste composition or the destination facility changes.
  - Check your transporter's work if they, as is commonly done, fill out these forms for you? (The ultimate responsibility for providing this information rests with you.)
- ☐ Yes You meet both requirements.
- ☐ No You are not meeting both requirements.



**41. Has your shop appointed an emergency coordinator who is available at all times and aware of the proper procedures for responding to an emergency?**

- ☐ Yes You meet this requirement.  
☐ No You are not meeting this requirement.

**42. Is the following information posted near the telephone: name and telephone number of the emergency coordinator, location of fire extinguishers, spill control equipment and fire alarms, and the telephone number(s) for fire department(s)?**

- ☐ Yes You meet this requirement.  
☐ No You are not meeting this requirement.

**43. Are employees who manage hazardous waste trained appropriate to their job responsibilities regarding hazardous waste and emergency response?**

Training should include:

- choice of containers, marking, labeling, container handling
- accumulation and storage time limits
- proper storage and inspections
- preparation of containers for shipment, manifesting
- emergency response

- ☐ Yes You meet all of the above requirements.  
☐ No You are not meeting all of the above requirements. Call SBEAP for Hazardous Waste fact sheet #1.09b, *Step 9: Personnel Training for Small Quantity Generators*, or #1.09c, *Step 9: Personnel Training for Large Quantity Generators*. Find them online at:  
<http://www.pca.state.mn.us/waste/pubs/1-09b.pdf>  
<http://www.pca.state.mn.us/waste/pubs/1-09c.pdf>

**Note:** For employees who might respond to chemical spill emergencies, the Occupational Safety and Health Administration (OSHA) regulation, Part 29.1910.120 in the Code of Federal Regulations, may apply. Call the OSHA Consultation office, at 651-284-5060 or 800-657-3776, for help with this OSHA regulation. This office is part of the Department of Labor and Industry.

**44. Do you maintain records of hazardous waste training for three years with:**

- names of employees trained?
- dates of this training?
- content of training?

(For protection from future liabilities, we recommend that you never discard these records.)

- ☐ Yes You meet all of the above requirements.  
☐ No You are not meeting all of the above requirements.

SQGs Stop Here  
For LQGs Only

**45. Do you have an up-to-date contingency plan available at your site?**

- ☐ Yes You meet this requirement.  
☐ No You are not meeting this requirement. Please see this Hazardous Waste fact sheet #1.08c, *Step 8: Plan for Emergencies - Contingency Plan for Large Quantity Generators*, visit the MPCA Web site at:  
<http://www.pca.state.mn.us/publications/w-hw1-08c.pdf>.

**46. Does your contingency plan:**

- specify emergency response actions?
  - list emergency coordinator names and phone numbers?
  - list emergency equipment?
  - contain an evacuation plan?
- ☐ Yes Your plan meets all of the above requirements.  
☐ No Your plan does not meet all of the above requirements.

**47. Do your emergency coordinators have the authority to act (to commit resources)?**

- ☐ Yes You meet this requirement.  
☐ No You are not meeting this requirement

48. Are new employees who manage hazardous waste trained in hazardous waste management procedures within six months of hiring?
- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement
49. Is annual hazardous waste training for employees conducted and documented?
- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement
50. Do training records identify a program director for hazardous waste, name of employees trained, their job titles, job descriptions, and training content?
- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement
51. Do you maintain training records for the lifetime of the facility or three years after an employee leaves? (For protection from future liability, we recommend that you never discard these records.)
- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement

## Contacts

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**MPCA Web site**    <http://www.pca.state.mn.us>

**Small Business Environmental Assistance Program**    651-282-6143  
[http://www.pca.state.mn.us/programs/sbap\\_p.html](http://www.pca.state.mn.us/programs/sbap_p.html)    800-657-3938

**Minnesota Technical Assistance Program (MnTAP)**    612-624-1300  
<http://www.mntap.umn.edu>    800-247-0015

### **Metropolitan Counties Hazardous Waste Staff**

Anoka County    763-422-7093  
<http://www.co.anoka.mn.us>

Carver County    952-361-1800  
<http://www.co.carver.mn.us>

Dakota County    952-891-7557  
<http://www.co.dakota.mn.us>

Hennepin County    612-348-3777  
<http://www.hennepin.us>

Ramsey County    651-266-2400  
<http://www.co.ramsey.mn.us>

Scott County    952-496-8475  
<http://www.co.scott.mn.us>

Washington County    651-430-6655  
<http://www.co.washington.mn.us>

### **Minnesota Department of Transportation**

Office of Freight and Commercial Vehicle Operations  
Hazardous Materials Staff    651-215-6300  
<http://www.dot.state.mn.us/cvo/hazmat.html>