



Audit Checklist - Aerosol Containers

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. Do you use aerosols?

- ☐ Yes You need to complete this checklist. (You also need to complete *Vehicle Maintenance Providers: Audit Checklist - Air Quality*).
- ☐ No You do not need to complete this checklist.

2. Are you managing your empty aerosol containers correctly, as industrial solid wastes, according to the following guidance? (Empty means that there is **no** pressure or product inside the container.)

- Arrange for transport of this waste to a permitted mixed municipal or industrial landfill. (Liquids should not go in landfills, so it is very important that these containers are truly empty.)
 - Find out where your hauler plans to take your trash.
 - Contact SBEAP at 651-282-6143 or 800-657-3938 to verify that this disposal facility has an MPCA permit.
 - Contact the operator of the disposal facility to find out what is and is not an acceptable material at this site. Verify that these empty aerosol containers are an acceptable material.
 - Store this waste separately in marked containers as directed by your hauler.

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

Hint: Empty aerosols may be able to be recycled in your community. Check with your local program. If you have to use many aerosols, you may want to consider equipment to puncture and drain partial containers - to recover usable liquids and recycle or dispose of empties.

Please fill out the front and back of this form.

3. **Do you have left over or unusable, full or partially full aerosol containers?** (Full or partially full means there is pressure or product inside.)
- ☐ Yes
- Check to see if your vendor will exchange failed or full containers.
 - For any full, working containers that your vendor will not take back, check with the Minnesota Technical Assistance Program at 612-624-1300 or 800-247-0015 to see if you can use the Minnesota Materials Exchange. This is a program set up to cut waste by arranging for leftover materials from one company to be given for use to another company.
 - For any containers that cannot be exchanged, you need to determine if these are hazardous wastes or industrial solid wastes. Evaluate the product that remains in the containers.
 - If your containers have paint in them, see Hazardous Waste fact sheet #4.40, *Evaluating Paint and Ink Wastes*. Call SBEAP to request this fact sheet or find it at <http://www.pca.state.mn.us/publications/w-hw4-40.pdf>. You will also need to complete *Vehicle Maintenance Providers: Audit Checklist - Painting*.
 - If your containers have something other than paint in them, see Hazardous Waste fact sheet, #1.00, *Basic Hazardous Waste Requirements for Businesses*. Call SBEAP to request this fact sheet or find it at: <http://www.pca.state.mn.us/publications/w-hw1-00.pdf>.
- ☐ No You are done with this checklist.
4. **Are any of your full or partially full containers a hazardous waste?**
- ☐ Yes
- Keep records of any tests or determinations used in this waste evaluation for at least three years. (For protection from future liability, we recommend that you never discard these records.)
 - Manage these containers according to hazardous waste rules. You also need to complete *Vehicle Maintenance Provider: Audit Checklist - Hazardous Waste*.
- ☐ No You need to manage them as an industrial solid waste. Follow guidance in question 2.
- Hint:** *You can cut costs substantially and reduce MPCA waste management requirements by eliminating the purchase of single-use aerosols. Buy bulk liquids at substantial cost savings instead and apply them with refillable, reusable containers that use shop compressed air. Result: More useable product at purchase price savings; fewer empty containers; no partial containers for problem disposal.*

Contacts

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 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>