



Minnesota
Pollution
Control
Agency

Step 2: Obtain a Hazardous Waste Identification Number

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What is a Hazardous Waste Identification Number?

A Hazardous Waste Identification Number (HW ID) is a unique number used to identify a physical location (not a business) at which hazardous waste is generated or treated. In Minnesota, the Minnesota Pollution Control Agency (MPCA) assigns HW ID numbers. Because the Environmental Protection Agency (EPA) assigned numbers at one time, they are often referred to as EPA IDs.

What sites need a HW ID?

In Minnesota, any business or government agency that generates, transports, or treats a non-exempt hazardous waste must obtain a HW ID.

Each non-contiguous site where non-exempt hazardous waste is generated or treated needs its own HW ID. (The term *contiguous* as it applies to HW IDs, is discussed in the section titled *Contiguous and Non-contiguous Sites*.)

In Minnesota, businesses that generate 100 pounds, 10 gallons, or less of non-acute hazardous waste per year are referred to by the term-of-convenience 'Minimal Quantity Generators' (MiniQG). Although MiniQGs are exempt from paying annual hazardous waste generator fees, they must still obtain a HW ID.

For more information on MiniQGs, see MPCA hazardous waste fact sheet #1.50, *Requirements for Minimal Quantity Generators* at www.pca.state.mn.us/publications/w-hw1-50.pdf.

For more information on classification of waste as 'acute,' see MPCA hazardous waste fact sheet #2.02, *P List of Acute Hazardous Wastes* at www.pca.state.mn.us/publications/w-hw2-02.pdf.

Other specific situations that may need a HW ID include:

- Separate businesses at the same site who will manage their waste separately.
- Sites operated by the same business that are close to each other but not contiguous.
- Sections of the same contiguous site owned and operated by the same business but with different street addresses, where the generator wishes to ship waste from each address.

What sites do not need a HW ID?

Unless required under another set of regulations, a site generating only exempt hazardous waste does not need a HW ID. Exempt hazardous wastes include:

- Universal wastes – where less than 5000 kilograms of all universal wastes are present at a time
- Recycled electronic wastes
- Used oil recycled or burned for energy recovery
- Household hazardous waste

Other specific situations that may not need a new HW ID include:

- Separate businesses at the same site engaged in a common enterprise (such as providing health care services) that

have agreed to manage their wastes collectively, and one of the businesses already has a HW ID under which that waste will be reported.

- Job sites at which a contractor generating a hazardous waste will transport it back to a central shop that already has a HW ID. This policy is discussed in MPCA hazardous waste fact sheet #3.11, *Transporting Hazardous Waste Generated by Construction and Service Contractors* at www.pca.state.mn.us/publications/w-hw3-11.pdf.
- Sections of the same contiguous site owned and operated by the same business, provided any waste transported between sections travels only on private roadways and all waste will be shipped from one street address.

Contiguous and non-contiguous sites

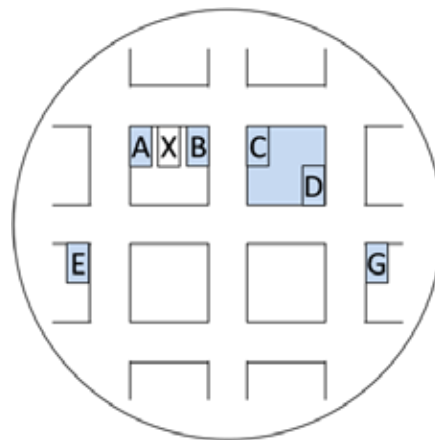
As used in hazardous waste regulation, a site is *contiguous* if all property used for hazardous waste activities

- is owned or controlled by a single business *and*
- touches, is immediately adjacent to, or can be reached by only crossing public rights of way.

Figure 1 illustrates most common site and HW ID scenarios. Shaded areas represent property owned or controlled by one business separated by public rights of way. White areas represent property owned by other businesses. The lettered blocks represent hazardous waste generating sites. (Note: the letter 'F' is omitted for visual clarity.) Looking at Figure 1:

- Sites A and B are not contiguous because they are separated by another party's property. Each would require a separate HW ID.
- Sites B and C are contiguous because they are accessible by only *crossing* the public right of way. They could be operated under a single HW ID.
- Sites C and D are contiguous because they are located on property that touches, even though the buildings may not be connected. They could be operated under a single HW ID.
- Sites D and G are contiguous because they are accessible by only *diagonally crossing* the intersection of two public right of ways. They could be operated under a single HW ID.
- Sites A and E are not contiguous because waste would be required to travel along a public right of way which does not border the generator's sites. Each would require a separate HW ID.

Figure 1: Illustration of 'contiguous'



Cogenerators

At some sites, two or more businesses may jointly perform or have responsibility for an activity that generates hazardous waste.

This can occur deliberately. For example, one business owns process equipment located on its own site, but the equipment is operated by employees of another business.

This can also occur inadvertently. For example, products owned by one business are damaged during transport by another business to an extent they require disposal. In these cases, both businesses are considered cogenerators of the hazardous waste.

Cogenerators are considered equally liable for proper management of the waste, including obtaining a HW ID for the site where the waste is generated. The MPCA prefers the cogenerators to jointly agree for one to take primary responsibility.

Contractors

As discussed earlier, contractors working at a remote site owned by another business may manage their hazardous waste generated at that site by

- The contractor transporting the waste back to their base site and disposing of it under that site's HW ID,
- The contractor obtaining a HW ID for the remote site in their (contractor's) name, or
- The remote site owner obtaining a HW ID under the site owner's name.

The MPCA strongly recommends that businesses who contract on-site services or have tenant contractors, clearly delineate responsibility for hazardous waste management. Hazardous waste responsibility includes obtaining a HW ID. Document the delineation in the

contractual agreement. In the absence of written contracts allotting waste management responsibility, the MPCA holds both parties equally liable for regulatory compliance.

How to obtain a HW ID

To obtain a HW ID, complete MPCA hazardous waste fact sheet #7.09, *Notification of Regulated Waste Activity*, located at www.pca.state.mn.us/publications/w-hw7-09.pdf.

There is no fee to submit the notification or obtain a HW ID. After receiving your completed notification form, the MPCA checks its records to determine whether a HW ID for that site was assigned to a previous business. If a HW ID was not assigned previously, the MPCA assigns a new HW ID for the site. If a previous business obtained a HW ID for the site, the MPCA reassigns the HW ID to your business.

The MPCA will mail you a letter notifying you of your HW ID. Keep this letter with your business records.

Obtaining a HW ID in an emergency

Occasionally, emergencies may occur in which hazardous waste is generated or accumulated at a site where such activity would not normally take place. In these situations, the MPCA can issue a HW ID by telephone to allow hazardous waste to be treated on site or shipped off-site with a hazardous waste manifest for proper management. In these cases, the party requesting the HW ID must submit a completed notification form immediately after the call.

If your business moves or closes

If your business either moves to another location or closes, you must request that the HW ID assigned to your former site be inactivated. You do this by completing the notification form again, including your HW ID and checking the ‘subsequent notification’ box. Submit the notification to the address on the form.

Failure to inactivate your HW ID offers the possibility of a new business moving into your former site, generating hazardous waste under your business information, and potentially incurring liability for you.

HW IDs are site-specific – not transferrable with your business.

If your business moves to a new location, remember to submit a notification form to request a HW ID specific to the new site (described in the section above entitled *How to obtain a HW ID*).

Checking a site's HW ID

You may check the HW ID for your own or any other site in Minnesota using the MPCA's *Search the EPA ID Number Database* tool, available at www.pca.state.mn.us/waste/epaID.

You may also search the EPA's national records for any site's HW ID using the EPA's *Enforcement and Compliance History Online* (ECHO), available through the EPA Web site at www.epa.gov.

More information

Your metro-area county and the MPCA have staff available to answer your HW ID and hazardous waste management questions. For more information, contact your metro-area county or the nearest MPCA office.

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 County.....	952-496-8475
Washington County.....	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

