



Step 6: Treat or Dispose of Hazardous Waste Correctly

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Responsibility for waste

R Hazardous waste generators remain responsible for the waste from the time it is generated to the time it is finally disposed of – and indefinitely beyond. This responsibility is often called ‘cradle-to-grave.’ One can never completely get rid of accountability for hazardous waste. However, one can minimize liability by carefully selecting the type of on- or off-site waste treatment or disposal.

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](#).

Waste minimization

The most effective way to lessen hazardous waste liability is to reduce the amount of hazardous waste generated. The Minnesota Technical Assistance Program (MnTAP) offers free technical assistance to help businesses reduce waste, increase efficiency, save on disposal and raw material costs, and decrease regulatory compliance burdens. Contact information is provided in the 'More information' section on page 3.

Waste management options

In general, you may not burn, land dispose, or evaporate hazardous waste at your site. You may also not dilute hazardous waste with other material in an attempt to render it non-hazardous. With prior approval from your regulatory agency, you may be able to evaporate the water portion of a non-volatile aqueous waste.

In Minnesota, generators may manage hazardous waste through one or more of the following methods.

Options for all generators

- Transport waste off site to a permitted hazardous waste treatment, storage, or disposal facility (TSDF) using a registered hazardous waste transporter.
- Transport waste off site to a recycling facility using a registered hazardous waste transporter.
- Reuse waste, or reclaim and reuse it as a partially exempt feedstock, byproduct, or reclaimed waste. This may be done on or off site. For detailed information on reuse and reclamation of hazardous wastes, see Minnesota Pollution Control Agency (MPCA) hazardous waste fact sheet #2.42, [Recycling Hazardous Waste](http://www.pca.state.mn.us/publications/w-hw2-42.pdf) at www.pca.state.mn.us/publications/w-hw2-42.pdf.
- Discharge waste to a Publicly Owned Treatment Works (POTW) or a permitted on-site Wastewater Treatment Facility (WWTF). If discharging waste, notify the POTW or WWTF before discharging and comply with any prohibitions or limitations it may impose. **Do not discharge hazardous waste to an on-site Subsurface Treatment System (SSTS).**
- Treat waste in a container or tank on your site until it reaches a non-hazardous state. Then dispose of it as an industrial solid waste. If the treatment will involve chemical fixation in an open container, you must obtain pre-approval from your regulatory authority.

Additional Options only for Very Small Quantity Generators

In addition to the above options, Very Small Quantity Generators (VSQG) may use one of these options to manage hazardous waste:

- Transport it themselves in their business vehicle to a Very Small Quantity Generator Collection Program (VSQGCP).

Note: Government-operated VSQGCPs may also pick up and transport hazardous waste from the VSQG's site.

- Mix a non-chlorinated petroleum-based solvent waste into used oil if:
 1. The solvent waste is not a toxic heavy-metal-containing paint waste.
 2. The solvent waste's flash point is greater than 100° Fahrenheit.
 3. The concentration of hazardous waste in the resulting mixture does not exceed ten percent (10%).
 4. You keep records of the type and amount of waste mixed.

Note: Any contamination of your solvent with chlorinated F-listed solvents, such as many fuel injector and carburetor or brake cleaners, will render it ineligible for disposal using this method. For more information on F-listed solvents, see MPCA hazardous waste fact sheet #2.00, [F List of Hazardous Waste](http://www.pca.state.mn.us/publications/w-hw2-00.pdf) at www.pca.state.mn.us/publications/w-hw2-00.pdf.

VSQGs that annually generate no acute hazardous waste and less than 100 pounds or 10 gallons of non-acute waste are called 'Minimal Quantity Generators' (MiniQGs). MiniQGs may also transport waste to a Household Hazardous Waste Collection Program provided:

- The waste is transported in their business vehicle
- They have made arrangements with the collection program before transporting

For more information on acute hazardous waste, see MPCA hazardous waste fact sheet #2.02, [P List of Acute Hazardous Waste](http://www.pca.state.mn.us/publications/w-hw2-02.pdf) at www.pca.state.mn.us/publications/w-hw2-02.pdf. For more information on MiniQGs, see MPCA hazardous waste fact sheet #1.50, [Requirements for Minimal Quantity Generators](http://www.pca.state.mn.us/publications/w-hw1-50.pdf) at www.pca.state.mn.us/publications/w-hw1-50.pdf.

Pre-transport requirements

If you intend to transport waste off site using either your own business vehicle or a registered hazardous waste transporter, before the waste leaves your site you must:

- Ensure the waste is identified, labeled, and packaged for transport according to Federal Hazardous Materials Regulations (HMR) administered by the U.S. Department of Transportation (DOT).
- Ensure your selected transporter has met applicable vehicle operator qualification and liability insurance requirements under the HMR.
- Ensure your selected transporter is registered with the Uniform Hazardous Materials Registration Program if it will transport your waste in or through any of the participating states of the Program. (Minnesota no longer participates in this Program.)
- Ensure your selected transporter has notified the MPCA of its transport activity and has been issued a Hazardous Waste Identification Number (HWID) – also called an EPA ID Number.
- Fill out a hazardous waste manifest for the shipment completely and correctly. For guidance on using and completing a hazardous waste manifest, see MPCA Hazardous Waste fact sheet #1.07, [Manifest Shipments of Hazardous Waste](http://www.pca.state.mn.us/publications/w-hw1-07.pdf) at www.pca.state.mn.us/publications/w-hw1-07.pdf. If you are a VSQG or MiniQG transporting your own waste to a VSQGCP, you may use a bill of lading or other document allowed under the HMR instead of a hazardous waste manifest.
- Ensure the waste is loaded and secured in the transport vehicle.
- Ensure the transport vehicle displays required placards. If it does not, offer applicable placards to the vehicle operator.
- If shipping hazardous waste of a type and in a quantity that requires placards, prepare and maintain a transportation security plan appropriate to the waste and transporter.

A transporter may perform some or all of the above actions as part of the service they provide. However, under both the Minnesota Hazardous Waste Rules and HMR you, the generator, remain fully responsible for correct completion.

Selecting a transporter and method of disposal

Once transported to a TSDF, hazardous waste may be finally treated or disposed of using a method such as incineration, fuel blending, chemical fixation, detoxification, or land disposal. Each method results in different waste products and liabilities for you, the original generator.

The MPCA and Metropolitan county hazardous waste programs strongly recommend that you carefully research and choose the hazardous waste disposal method most appropriate for your waste and your desired future liability. Keep in mind that choosing a hazardous waste transporter or disposal vendor does not automatically require you to select their most commonly offered disposal method.

Actions you can take when selecting a transporter, TSDF, and disposal method most appropriate for your waste include:

- Perform due diligence on your selected transporter and disposal facility, including contacting their state regulators to inquire about their compliance history. The MPCA or your metropolitan county can help you determine a vendor's regulator(s).
- Assess lifetime cost and your liability of the available hazardous waste disposal methods.
- Request references or names of other customers of the vendor and contact them.

More information

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

Address questions regarding the Federal Hazardous Materials Regulations (HMR) to the U.S. DOT or Minnesota DOT.

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 (MnTAP)

Toll free (non-Metro)	1-800- 247-0015
Metro.....	612- 624-1300
Web	www.mntap.umn.edu

Minnesota Department of Transportation

Hazardous Materials.....	651- 215-6330
Web site.....	www.dot.state.mn.us/cvo/hazmat.html

U.S. Department of Transportation

Hazardous Materials.....	1-800-467-4922
Web site.....	www.phmsa.dot.gov/hazmat