



Minimal Quantity Generators of Hazardous Waste

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Who are Minimal Quantity Generators?

In Minnesota, all businesses and government agencies that generate any hazardous waste are regulated under the Minnesota Hazardous Waste Rules. Known as *generators*, they are regulated based on the amount of hazardous waste they generate at a location. The amount generated determines their generator size:

- 1000 kilograms (kg) or more of hazardous waste OR 1 kg or more of acute hazardous waste generated per month classifies a generator as a Large Quantity Generator (LQG).
- Between 100 kg* and 1000 kg of hazardous waste and less than 1 kg of acute hazardous waste per month classifies a generator as a Small Quantity Generator (SQG).
- 100 kg or less of hazardous waste and less than 1 kg of acute hazardous waste per month classifies a generator as a Very Small Quantity Generator (VSQG).

**100 kg is approximately 220 pounds*

The Minnesota Pollution Control Agency (MPCA) further classifies VSQGs that generate less than 100 pounds of hazardous waste *and* no acute hazardous waste in a year by the term-of-convenience *Minimal Quantity Generators* (MiniQG).

For more information on hazardous waste generator sizes, see MPCA hazardous waste fact sheet #1.01, [Step 1: Evaluate Waste; Determine Generator Size](http://www.pca.state.mn.us/publications/w-hw1-01.pdf) at <http://www.pca.state.mn.us/publications/w-hw1-01.pdf>.

What are the differences between MiniQGs and other generators?

MiniQGs are subject to the same hazardous waste accumulation and emergency preparedness requirements as VSQGs, but unlike any other hazardous waste generators, MiniQGs:

- are exempt from annual hazardous waste generator license fees
- must only complete and submit a Hazardous Waste Generator License Application every three years (instead of annually)
- may dispose of hazardous waste at a Household Hazardous Waste Collection Program, provided they inform the receiving Program that they are a regulated business or government agency and the Program agrees to accept the waste

Not all Metropolitan Counties recognize the MiniQG category. If your site is located in the seven-county Minneapolis-St Paul metropolitan area, check with your county hazardous waste regulatory agency.

As a MiniQG, what must I do?

The MPCA summarizes the requirements for MiniQGs in these ten steps, which are discussed in more detail below.

1. Evaluate your waste and determine that you are a MiniQG.
2. Obtain a Hazardous Waste Identification Number (HWID), also known as an 'EPA ID Number'.
3. Submit a completed Hazardous Waste Generator License Application when you receive one (every three years).
4. Contain and label your hazardous waste.
5. Store your hazardous waste properly.
6. Transport and dispose of your hazardous waste correctly.
7. Prepare a manifest to accompany shipments of hazardous waste shipped with a third-party transporter.
8. Plan for emergencies.
9. Train your employees as needed.
10. Document all of the above steps and keep those records.

1. Evaluate your waste and determine that you are a MiniQG

You must either evaluate your waste to determine whether it is hazardous waste or assume it is hazardous. Most petroleum or oil-based solvents, paints, and finishes will be hazardous wastes. Some types of waste are exempt, like food preparation waste and ordinary paper and cardboard. Containers that meet the hazardous waste definition of '[empty](#)' are also exempt.

For guidance in evaluating your waste, see MPCA hazardous waste fact sheet #1.01, [Step 1: Evaluate Waste, Determine Generator Size](#) at <http://www.pca.state.mn.us/publications/w-hw1-01.pdf>.

Remember: In a calendar year, MiniQGs may generate only 100 pounds (about 10 gallons liquid) or less of hazardous waste, and no acute hazardous waste at all.

2. Obtain a Hazardous Waste Identification Number (HWID)

All Minnesota hazardous waste generators, including MiniQGs, must get a Hazardous Waste Identification Number (HWID) – also known as an *EPA ID Number*.

To get your free HWID, complete and submit MPCA hazardous waste form #7.09, [Notification of Regulated Waste Activity](#) at <http://www.pca.state.mn.us/publications/w-hw7-09.pdf>.

3. Submit a completed Hazardous Waste Generator License Application when you receive one

To ensure MPCA records are updated while conserving state resources, the MPCA requires MiniQGs located out of the seven-county metropolitan area to submit a Hazardous Waste Generator License Application only once every three years. You should receive one automatically. When you receive one, complete it and return it to the MPCA by the due date printed on the Application.

If, during any calendar year, you generate more than the volume of waste allowed as a MiniQG, you must download, complete, and submit an Application by July of the next calendar year. For a blank Application, MPCA hazardous waste form #7.01, [Hazardous Waste Generator License Application](#) at <http://www.pca.state.mn.us/publications/w-hw7-01.pdf>.

If you are located in the seven-county metropolitan area, check with your county staff about licensing requirements.

4. Contain and label your hazardous waste

Store your hazardous waste in containers that are compatible with the waste, able to contain the waste completely, and closed. *Compatible* means the waste will not corrode or degrade the container. *Closed* means you must manually secure container closures; you may not rely on gravity alone to secure container lids or closures.

Mark or label your hazardous waste containers with:

- the words 'Hazardous waste'
- a clear description of the waste

The waste description on the container should identify the waste and its risks to employees and emergency responders.

For guidance in containing, marking (labeling), and storing your waste, see MPCA hazardous waste fact sheet #1.04/1.05, [Steps 4 & 5: Mark and Store Hazardous Waste Correctly](http://www.pca.state.mn.us/publications/w-hw1-04-05.pdf) at <http://www.pca.state.mn.us/publications/w-hw1-04-05.pdf>.

5. Store your hazardous waste properly

Store closed and labeled hazardous waste containers in an area that can contain all the contents of the containers should they leak. Ensure the floor under the containers does not have any cracks or open floor drains. Allow enough room around each container to ensure you can move it out of your storage area without having to move other containers or equipment. You may need to perform and document [weekly inspections](#) of your hazardous waste containers.

Hazardous waste is usually stored indoors. However, if you need to store your hazardous waste outdoors, you must:

- provide secondary containment
- protect containers from vehicles and equipment
- protect the containers from exposure to precipitation and heat

Immediately clean up spills – both hazardous waste and products that are hazardous waste when you dispose of them. Also, immediately report spills that could reach the air, land, or water outside of your building to the Minnesota Duty Officer at 1-800-422-0798 or 651-649-5451 (if an emergency, first call 9-1-1).

6. Transport and dispose of your hazardous waste correctly

As a MiniQG, you may:

- Discharge liquid hazardous waste to a Publicly Owned Treatment Works (POTW) – provided you have first notified the POTW of your intent to discharge and the POTW does not prohibit it
- Contract with a commercial hazardous waste transporter to pick up your hazardous waste and transport it to an appropriate disposal facility
(If you ship your waste with a commercial hazardous waste transporter, you must prepare a uniform hazardous waste manifest to accompany the waste.)
- Transport your own waste to a Very Small Quantity Generator Collection Program (Program)
Some government-operated Programs may pick up waste from your site. For a list of Programs, see MPCA hazardous waste fact sheet #2.51, [VSQG Collection Program Requirements for Generators and List of Licensed Programs](http://www.pca.state.mn.us/publications/w-hw2-51.pdf) at <http://www.pca.state.mn.us/publications/w-hw2-51.pdf>.
- Transport your own waste to a Household Hazardous Waste Collection Program (HHWCP), provided you inform the receiving HHWCP prior to transporting your waste that you are a regulated business or government agency and the HHWCP agrees to accept your waste

If you transport your own hazardous waste to a Program or HHWCP, you must comply with applicable U.S. Department of Transportation (DOT) Hazardous Materials Regulations (HMR) requirements. For more information about transporting your own hazardous waste, see MPCA hazardous waste fact sheet #2.53, [Transporting Waste to a Very Small Quantity Generator Collection Program](http://www.pca.state.mn.us/publications/w-hw2-53.pdf) at <http://www.pca.state.mn.us/publications/w-hw2-53.pdf>.

7. Prepare a manifest to accompany shipments of hazardous waste shipped with a third-party transporter

You need to use a uniform hazardous waste manifest if you contract with a commercial transporter to pick your hazardous waste. If you transport your own waste to a Program or HHWCP, you should not use the uniform hazardous waste manifest. The program may require and will help you prepare a different type of shipping paper.

For detailed information on using a uniform hazardous waste manifest, see MPCA hazardous waste fact sheet #1.07, [Step 7: Manifest Shipments of Hazardous Waste](http://www.pca.state.mn.us/publications/w-hw1-07.pdf) at <http://www.pca.state.mn.us/publications/w-hw1-07.pdf>.

8. Plan for emergencies

Provide appropriate emergency equipment where needed including:

- Portable fire extinguishers appropriate to the type of waste you accumulate
- Spill control and cleanup equipment appropriate to the type and volume of waste you accumulate
- Personal protective equipment that will protect you or your employees when cleaning up a spill
- A way to summon help to wherever hazardous waste is handled at your site
(In small shops where more than one employee will be present at all times, you may rely on shouting for help if you are always within vocal range.)

For more guidance on planning for emergencies, see MPCA hazardous waste fact sheet #1.08a, [Step 8: Emergency Planning for VSQGs](http://www.pca.state.mn.us/publications/w-hw1-08a.pdf) at <http://www.pca.state.mn.us/publications/w-hw1-08a.pdf>.

9. Train your employees as needed

Hazardous Waste Rules do not require that MiniQGs and VSQGs train their employees. However, you may still be required to provide some type of hazardous waste training by other agencies, such as the DOT or U.S. Occupational Safety and Health Administration (OSHA). Even if not required, the MPCA strongly recommends hazardous waste training as the most effective way to reduce hazardous waste liabilities and protect employees.

For more guidance on employee training, see MPCA hazardous waste fact sheet #1.09a, [Step 9: Personnel Training for VSQGs](http://www.pca.state.mn.us/publications/w-hw1-09a.pdf), available at <http://www.pca.state.mn.us/publications/w-hw1-09a.pdf>

10. Document all of the above steps and keep those records

Ensure all hazardous waste records, including disposal receipts and inspection records, are available at the site at which you generate waste.

For guidance on hazardous waste records, see MPCA hazardous waste fact sheet #1.10, [Step 10: Keep Hazardous Waste Records](http://www.pca.state.mn.us/publications/w-hw1-10.pdf) at <http://www.pca.state.mn.us/publications/w-hw1-10.pdf>.

Reduce the amount of waste you generate

The best way to lessen your hazardous waste costs and responsibilities is to reduce the amount of hazardous waste you generate. Contact the Minnesota Technical Assistance Program (MnTAP) for help in your effort to reduce waste using product substitution and efficiency techniques.

More information

Your metropolitan county and the MPCA have staff available to answer waste management questions. For more information, contact your metropolitan county hazardous waste office or your nearest MPCA regional hazardous waste staff. For information about waste reduction, contact the Minnesota Technical Assistance Program.

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 ... [http://www.co.\[county\].mn.us](http://www.co.[county].mn.us)

Minnesota Technical Assistance Program

Toll free 1-800-247-0015
Metro 612-624-1300
Web site <http://www.mntap.umn.edu>

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 <http://www.pca.state.mn.us>