



Requirements for Minimal Quantity Generators (MQGs)

Waste/Hazardous Waste #1.50, rev. September 2004

This fact sheet is intended for businesses that generate 100 pounds of hazardous waste or less in a calendar year.

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Background

A Very Small Quantity Generator (VSQG) of hazardous waste is a business that generates less than 220 pounds (about 22 gallons liquid) per month. VSQGs that generate 100 pounds (about 10 gallons liquid) or less of hazardous waste **in an entire year** are called “Minimal Quantity Generators” (MQGs). The Minnesota Pollution Control Agency (MPCA) has established the following requirements for MQGs, which reduce record-keeping, reporting and fee requirements for qualifying generators. MQGs still have the responsibility of handling and disposing of waste properly. **(If your business is located in the seven-county Twin Cities metropolitan area,** check with your county’s hazardous waste staff to determine whether they have a Minimal Quantity Generator classification.)

Environmental Concerns

Though a business may generate only small quantities of hazardous waste, even small amounts of waste handled and disposed of improperly can harm human health and the environment.

Prevent Waste

Make a habit of buying only what you need and using it up before it expires. Use the least amount you can that will do the job. If a little is good, more may not be better – just wasteful. Remember, outdated and unusable supplies are waste, and disposal often costs more than the purchase price. Look for ways to modify processes that will pay off by generating less waste. Reducing waste will save you money.

Qualifications for Minimal Generator Status

All businesses that generate (produce) waste must “evaluate” it – that is, determine whether it is hazardous – and why. To manage a waste correctly, the generator (producer) of the waste must be familiar with its properties. For example, is the waste acutely hazardous? Is it incompatible (will react) with another waste? For help evaluating waste, request the booklet entitled “Warning — What You Don’t Know May Cost You” or MPCA Waste fact sheet #1.01, *Evaluate Waste*. MPCA or metropolitan county hazardous waste staff can also help you. See telephone numbers on page 4.

A Minimal Quantity Generator may generate **only** these types and amounts of hazardous waste:

- Any amount of photographic waste provided it is treated on site to remove 80 percent of the silver and discharged directly (with permission) to a sanitary sewer connected to a wastewater treatment plant.
- Any amount of used oil, used oil filters, and used oil-contaminated sorbents provided they are recycled.
- Any amount of spent lead-acid batteries, provided they are recycled.
- Any amount of PCB ballasts and capacitors provided they are managed according to MPCA guidance.
- Any amount of antifreeze, provided it is recycled or, if less than 50 gallons per month is generated, discharged with permission to a wastewater treatment plant.



- Any amount of Universal Waste – fluorescent lamps, batteries, pesticides, thermostats and mercury-containing devices – managed under Universal Waste Rule requirements.
- Any amount of fuel-water mixtures, provided they are recycled.
- One hundred pounds (about 10 gallons of liquid) or less per year of all other hazardous wastes.

A Minimal Quantity Generator may not generate any amount of acutely hazardous waste. Acutely hazardous waste includes wastes with the waste codes F020, F021, F022, F023, F026 and F027 and wastes found on the “P” list. For more information see MPCA hazardous waste fact sheet #2.02, *P List of Acutely Hazardous Wastes*.

Some wastes should not be counted toward the 100-pound annual generation limit. These include:

- Garbage and rubbish, such as paper and cardboard. (Recycle if possible!)
- Empty containers. (Aerosol cans are empty only if they do not contain any material or pressure.) For more information, see MPCA hazardous waste fact sheet #2.44, *Managing Empty Containers*.
- Demolition debris (for example, debris from tearing down a building used for your business).
- Disposable towels or wipes that were used only with solvents listed in Table 1 and that have either been wrung dry or have become dry through use.
- Reusable towels that have been used only with solvents listed in Table 1 and that have either become dry during use or have been wrung dry and are laundered by a commercial laundry. For more information, see MPCA’s hazardous waste fact sheet #4.61, *Managing Towels, Wipes and Sorbents*.
- Solvent waste that is moved through piping directly to a distillation unit without first being stored in a separate container.
- Nonhazardous mixtures, such as mixtures of used oil and parts-washer solvent (hazardous only because of a flash point below 140° F), provided that the used-oil mixture is recycled and does not contain more than 10 percent solvent by volume. (Count the solvent toward the 100-pound limit before mixing.)

Table 1: Ignitable-Only Solvents

F-listed Solvents (F003)	Characteristically-Hazardous Solvents (D001)
<p>The following spent nonhalogenated solvents:</p> <ul style="list-style-type: none"> • xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; • all spent solvent mixtures/blends containing, before use, only the above spent nonhalogenated solvents; • all spent solvent mixtures/blends, containing, before use, one or more of the above nonhalogenated solvents and a total of 10% or more by volume of one or more of those solvents listed in F001, F002, F004, and F005; and • the still bottoms from the recovery of these spent solvents and spent solvent mixtures 	<p>Liquids (other than aqueous solutions containing less than 24 percent alcohol by volume) with a flash point below 140° F</p>

Containing, Marking and Storing Waste

Waste-collection containers may range in size from pint or quart containers to above-ground or underground storage tanks. Choose a container size that is appropriate to the amount of waste you will generate and the way you will dispose of the waste. (Remember, you must register above-ground tanks with a capacity of 500 gallons or more and underground tanks with a capacity of more than 110 gallons with the MPCA and follow all applicable tank rules.) Wastes that you intend to take to a waste-collection site should be collected in containers small enough to be handled easily and that readily fit into your vehicle.

These requirements for Minimal Generators are designed to ensure waste is collected and stored in a manner that will prevent a release to air, water or land.

1. **Choose a waste container that is in good condition** and will hold the waste without disintegrating – that is, it is “compatible” with the waste. It should contain no residue that will react with the waste. The container the product came in is often the best choice, provided it is in good condition.
If a container begins to deteriorate, place its contents or the entire container inside another container that is in good condition.
2. **Mark the container** with the words “Hazardous Waste” and a clear, understandable description of the waste. If the container is holding used oil, used oil filters, used oil sorbents or fluorescent lamps, only the



description is needed, not the words “Hazardous Waste.” (If you place a container inside another, mark the outside container as well.)

3. **Close the container** and keep it closed at all times – except when adding or removing waste.
4. **Whether indoors or outdoors, place the container on an “impermeable” surface** – one that will not allow waste to pass through. There should be no cracks or floor drains that could allow waste to escape. Separate incompatible wastes and make sure there is enough space around each waste container to allow you to check its condition and easily move or remove it if necessary.

If storing waste outdoors, you must also:

- Provide secondary containment, such as curbs, berms or something similar, that will collect and contain liquid waste if the container starts to leak.
- Provide shade or protection for ignitable wastes like solvents, to prevent the container from heating and rupturing.
Simply placing a tarpaulin over a container does not work as shade because it will actually hold heat and may cause the container to leak.
- Store waste in a manner that will protect it from accidental damage due to vehicles, vandals, weather conditions, etc.

5. **You may store the 100 pounds of hazardous waste (or less) that you generate each year until you reach the 550-pound storage limit** (about the equivalent of one 55-gallon container of liquid waste). Once you reach this limit, you must dispose of the waste (or a portion of the waste) in an acceptable manner within 75 days. Remember, the longer you store waste, the greater the possibility the storage container may deteriorate and leak. It is a good idea to collect waste in small enough containers that will allow you to dispose of it regularly.

Spills

Even if you are careful, spills can happen. Be prepared, because you are required to clean up spills. Have on hand the materials you will need to quickly contain and clean up a spill. Keep clean-up materials together in one place and know how to use them. Remember, the spill-cleanup material is also a waste and will need to be placed in a container following the Containing, Marking and Storing requirements discussed previously.

Petroleum spills greater than five gallons and spills of any other kind that may pollute air, land or water must be reported to the *Minnesota Duty Officer* at the telephone number on page 4. When calling the duty officer, be prepared to report:

- the location of the spill,
- the kind and amount of spilled material and
- your clean-up activities.

You must keep records of this information on site for at least three years.

If one pound or more of PCB oil is released, you must also notify the National Response Center within 24 hours at the telephone number on page 4.

Disposal / Recycling Options

It is illegal to:

- evaporate,
- dilute,
- dump,
- dispose of hazardous waste in solid waste
- discharge it to a septic system, storm water drainage system or any other water body or
- abandon your waste – including leaving it behind when you move to a new location.

When possible, send (or take) waste to a recycling facility. Recycling facilities either reuse or reclaim the waste instead of just destroying it. An example of recycling is used oil being burned to recover the energy.

Minimal Quantity Generators can take waste to:

- a Very Small Quantity Generator (VSQG) collection site or
- a household hazardous waste collection site **that accepts VSQG waste**. (Household hazardous waste collection sites are not required to accept waste from businesses, but some do accept waste from VSQGs and MQGs, for a fee. Be sure to check and get pre-approval before taking your waste there.)

Used oil may be taken to a local automotive repair shop provided the shop sends it off site for recycling. (Not all shops accept used oil.)

For the nearest Very Small Quantity Generator collection site, see MPCA’s hazardous waste fact sheet #2.51, *VSQG Collection Program Requirements for Generators*. To



find the nearest household hazardous waste collection site and to find out whether it accepts minimal quantity generator waste, call your county-government office.

You may also use companies that are licensed to transport your hazardous wastes to a licensed or permitted disposal facility, but the cost may be higher.

Specific wastes may have additional disposal options. If you wish to use any other disposal option, call the MPCA or your metropolitan county staff for more information. There are many fact sheets available that discuss management of specific wastes. A list of these fact sheets is available on the *MPCA Web site* or by calling the MPCA or your metropolitan county staff at the phone numbers listed in Table 2.

Shipping Procedures

If you are taking waste to a collection site, you need to follow Department of Transportation requirements. VSQG collection sites provide a free booklet titled *Transportation Guidelines for VSQG Collection Programs* that will help you meet these requirements. Make sure waste is closed and secured in your vehicle. Take precautions to prevent spills. (Sometimes you may need to put small containers inside larger, closed containers to make sure they don't leak.) Use a shipping paper that shows the date of shipment, amount of waste shipped, the name and address of the destination of the waste, the date it is received at the destination, and the name and address of the person taking it there.

Required Paperwork

If you send waste with a licensed hazardous waste transporter and a manifest is used, you must keep the copies you receive for three years. You must also keep records of any spills. There are no other paperwork requirements, although it is always wise to keep records of how much hazardous waste you generate and how you dispose of it. Also, financial institutions often require proof that you are complying with environmental rules before lending money. Good business records may provide that proof.

More Information

The MPCA and your metropolitan county hazardous waste offices have staff who can help you. Contact your metropolitan county or the MPCA office nearest your business at the numbers below.

The MPCA also offers many fact sheets and guidance documents at its Web site. Local libraries often have Internet access and will allow you to print information for a nominal charge. To find hazardous waste fact sheets at the *MPCA Web site*, select *Waste*, then *Publications/Hazardous Waste Fact Sheets*. All fact sheets are in portable document file (PDF) format. To read them, you will need the Adobe Acrobat Reader, which can be downloaded free from the MPCA Web site. If you are unable to access fact sheets on the Internet, you can request them from the MPCA and Metro County sources listed below.

Metro County Hazardous Waste Offices

- Anoka County (763)422-7093
- Carver County (952)361-1800
- Dakota County (952)891-7557
- Hennepin County (612)348-3777
- Ramsey County (651)773-4466
- Scott County (952)496-8475
- Washington County (651)430-6655

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)297-2274
- Willmar (320)214-3786

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

Spill Reporting

- Minn. Duty Officer (651)649-5451
- Toll free 1-(800)422-0798
- TDD: (651)215-6952
- National Response Center
..... 1-(800)424-8802