



Emergency Planning for Very Small Quantity Generators

Step 8 in the [10 Steps to Hazardous Waste Compliance series](#)

No business ever intends to have an emergency involving hazardous waste, but unexpected events do occur. To protect your employees and lower your risk, it is important to plan for hazardous waste-related emergencies before they happen.

This fact sheet will discuss the hazardous waste emergency planning requirements administered by the Minnesota Pollution Control Agency (MPCA) and the Metropolitan Counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington (Metro Counties).

Your hazardous waste emergency planning requirements are determined by your site's hazardous waste generator size. See MPCA fact sheet #w-hw1-02, Determine Generator Size, at:

<https://www.pca.state.mn.us/sites/default/files/w-hw1-02.pdf>.

This fact sheet will address Very Small Quantity Generator (VSQG) requirements. For other size generators, see:

- MPCA fact sheet #w-hw1-08b, Emergency Planning for Small Quantity Generators, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-08b.pdf>.
- MPCA fact sheet #w-hw1-08c, Emergency Planning for Large Quantity Generators, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-08c.pdf>.

What are my emergency planning and response requirements?

In general, every generator must maintain their facility and operate it to minimize the possibility of hazardous waste incidents. To meet this requirement, follow equipment manufacturer directions, apply industry best management practices (BMPs), and comply with federal, state, and local safety regulations, such as U.S. Occupational Safety & Health Administration (OSHA) standards and the Minnesota State Fire Code.

In addition, you must provide:

- [An internal public address or alarm](#) to notify employees of an emergency.
- [Internal communications that let any employee summon aid](#) wherever hazardous waste is handled at your site. This is known as *immediate access to emergency communications*.
- [External telecommunications](#) so employees can contact local emergency response agencies.
- [Fire protection equipment appropriate for your wastes](#).
- [Spill control equipment appropriate for your wastes](#).
- [Employee decontamination equipment appropriate for your wastes](#).

Finally, you must:

- [Maintain and test all emergency equipment](#), including communications systems and fire, spill, and decontamination equipment to ensure it will work in an emergency.
- [Respond](#) to the best of your facility's ability to safely stop, contain, and collect spills of hazardous waste or any other material that may pollute the environment.
- [Immediately report all such spills to the Minnesota Duty Officer](#).

Each of these requirements is discussed more completely on the following pages.

Internal public address or alarm

You must be able to quickly notify all of your employees of a hazardous waste incident or signal them to evacuate your facility. For small shops, the human voice, such as yelling, may be sufficient. However, if your facility includes equipment or vehicles that are loud enough to drown out human speech, or parts of your facility are behind doors that are usually closed, you must provide another means, such as an intercom, public address system, or fire alarm.

Internal communications that let any employee summon aid

Any employee handling hazardous waste at your site must be able to quickly summon aid to their location. For small shops, the human voice may be sufficient. However, if your facility includes equipment or vehicles that are loud enough to drown out human speech, or if employees handle hazardous waste in outbuildings or behind closed doors, you must provide either:

- Equipment, such as handheld radios, cellphones, or alarm 'call' buttons. A general fire alarm pull does not meet this requirement, as it does not bring aid to the employee's location. If you rely on employees carrying and using their personal cellphones to meet this requirement, you must document this plan and train your employees in its use.

Note: If you intend to use electronic equipment near a flammable atmosphere, such as a paint booth, you must minimize fire ignition risks, such as by the use of intrinsically safe equipment.

- Procedures, such as a 'buddy system', where any employee working with hazardous waste must always remain in voice contact with another employee not working with the hazardous waste. If you use procedures, you must document them and train your employees in their use.

External telecommunications

Your employees must be able to contact local emergency response agencies, most commonly through the telephone '911' system. For most generator sites with landline telephones on-site, this requirement is not an issue. However if you generate hazardous waste at remote sites, such as contractors or normally unmanned sites, you must ensure employees at the remote site have external communications. If you rely on employees carrying and using their personal cellphones, you must document this plan and train your employees in its use.

Fire protection equipment appropriate for your wastes

You must provide fire protection equipment appropriate for the wastes and other flammable or combustible materials at your site. In general, OSHA and the Fire Code require portable fire extinguishers or handheld hose stations at least every 75 feet on the same floor and also in every enclosed area or room where ignitable hazardous wastes, such as used solvents, are handled.

Portable fire extinguishers and fixed fire hose lines must be able to be accessed without moving any other equipment, containers, or materials. This is effectively the same as the aisle space requirements for hazardous waste containers discussed in MPCA fact sheet #w-hw1-05, Accumulate Hazardous Waste, at:

<https://www.pca.state.mn.us/sites/default/files/w-hw1-05.pdf>.

In addition, you must ensure that your site is provided with an adequate water supply for firefighting purposes. For sites in a municipality that is served with fire hydrants, this may be accomplished by identifying the closest hydrant to your site and verifying with the local fire department that the hydrant would be able to fight a fire at your facility. However, if your site is in a community without hydrants or is in a rural area, you must contact your local fire department and ensure arrangements to provide an adequate water supply have been made. If they have not, you may need to make additional water available, such as with a well or pond.

Spill control equipment appropriate for your wastes

You must provide spill control equipment, including employee personal protective equipment (PPE), appropriate for both the volume and types of wastes and other potentially hazardous materials at your site. Ensure that your spill control supplies are sufficient to fully respond to a spill of the largest container or tank of hazardous waste at your site.

Spill control equipment must be able to be accessed without moving any other equipment, containers, or materials. This is effectively the same as the aisle space requirements for hazardous waste containers discussed in MPCA fact sheet #w-hw1-05, Accumulate Hazardous Waste, at:

<https://www.pca.state.mn.us/sites/default/files/w-hw1-05.pdf>.

Employee decontamination equipment appropriate for your wastes

You must provide employee decontamination equipment, such as handwashing sinks, eye wash, or showers, appropriate to both the volume and types of wastes and hazardous materials at your site and for the exposure hazards to employees. The type and capacity of the equipment must meet OSHA or other regulatory standards.

For example, eye wash equipment must be provided within 55 feet and on the same floor as any corrosive hazardous waste that may splash and within 25 feet of any area where acid-containing batteries are maintained, such as by adding water. Many other hazardous wastes may require decontamination equipment.

Employee decontamination equipment must be able to be accessed without moving any other equipment, containers, or materials. This is effectively the same as the aisle space requirements for hazardous waste containers discussed in MPCA fact sheet #w-hw1-05, Accumulate Hazardous Waste, at:

<https://www.pca.state.mn.us/sites/default/files/w-hw1-05.pdf>.

Maintain and test emergency equipment

Maintain your emergency equipment in proper working condition at all times.

Inspect and test all your emergency equipment as necessary or required. The inspection or testing frequency may be mandated by regulations, such as for fire protection and employee decontamination gear. If regulations do not specify inspection or testing intervals for your equipment, you must follow the manufacturer's maintenance schedules or accepted industry best management practices.

For example, portable fire extinguishers must be visually inspected by your employees at least monthly and inspected by a trained technician annually, even if the gauge shows 'normal' or 'in the green'. Plumbed eye washes and showers must be flushed weekly and inspected by trained staff annually.

Keep documentation of all inspections and maintenance of emergency equipment. See MPCA fact sheet #w-hw1-10, Keep Records, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-10.pdf>.

Respond to spills and incidents

To the best of your site's ability while keeping your employees safe, stop, contain, and collect spills of hazardous waste or any other material that may pollute the environment.

Though not required by the hazardous waste regulations, ensuring that employees who respond to hazardous waste incidents at your site are properly trained increases their effectiveness and lowers your risk. See MPCA fact sheet #w-hw1-09a, Personnel Training for Very Small Quantity Generators, at:

<https://www.pca.state.mn.us/sites/default/files/w-hw1-09a.pdf>.

Manage hazardous waste spill debris as you would the source material, or evaluate the debris. See MPCA fact sheet #w-hw1-01, Evaluate Waste, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf>

If you are unable to safely contain or respond to a hazardous waste incident, call your local emergency response agencies, most commonly through the 911 system.

Immediately report spills to the Minnesota Duty Officer

Immediately report all spills that may reasonably reach the environment to the Minnesota Duty Officer, even if you have already called 911. See [More information](#) below. If there is a need for local emergency response agencies, however, call them first. The Minnesota Duty Officer will not contact them for you. If you must evacuate your facility, call the Minnesota Duty Officer from a safe location.

If a spill is contained completely within your building, or in a secondary containment basin, you do not need to report it to the Minnesota Duty Officer. There is no negative consequence or penalty for voluntarily reporting spills, however. If you are unsure whether a spill must be reported, the MPCA recommends you report it.

When you call the Minnesota Duty Officer, be ready to provide:

- Your name.
- Call-back telephone number where you may be contacted if more information is needed.
- Date, time, and location of the incident.
- Whether local emergency response agencies have been notified.
- What was spilled and how much of it.
- Identity of the person or business responsible for the incident, if known.
- Whether surface waters or any sewer systems are affected.
- Basic description of the incident.

More information

Guidance and requirements in this fact sheet were compiled from Minnesota Rules, Chapter 7045. To review Minnesota Rules, visit the Office of the Revisor of Statutes at <https://www.revisor.mn.gov/pubs>.

For information about waste minimization, contact the Minnesota Technical Assistance Program (MnTAP). The MPCA's Small Business Environmental Assistance Program can offer free, confidential compliance assistance. Immediately report all hazardous waste spills that may reach the environment to the Minnesota Duty Officer.

Metro County Hazardous Waste Offices

Anoka	763-422-7093
.....	https://www.anokacounty.us/
Carver	952-361-1800
.....	http://www.co.carver.mn.us/
Dakota	952-891-7557
.....	https://www.co.dakota.mn.us/
Hennepin	612-348-3777
.....	http://www.hennepin.us/
Ramsey	651-266-1199
.....	https://www.ramseycounty.us/
Scott	952-496-8475
.....	http://www.scottcountymn.gov/
Washington	651-430-6655
.....	https://www.co.washington.mn.us/

Minnesota Technical Assistance Program

Toll free	1-800-247-0015
Statewide	612-624-1300
.....	http://www.mntap.umn.edu

Minnesota Pollution Control Agency

Toll free	1-800-657-3864
Statewide	651-296-6300
.....	https://www.pca.state.mn.us/

Minnesota Duty Officer

Toll free	1-800-422-0798
Statewide	651-649-5451

Small Business Environmental Assistance Program

Toll free	1-800-657-3938
Statewide	651-282-6143
.....	https://www.pca.state.mn.us/sbeap/

Minnesota State Fire Marshal

Statewide.....	651-201-7200
.....	https://dps.mn.gov/divisions/sfm/

Minnesota OSHA

Statewide.....	651-284-5050
.....	http://www.dli.mn.gov/mnosha.asp

U.S. Occupational Safety & Health Administration

Toll free.....	1-800-321-6742
.....	https://www.osha.gov/