



Keep Hazardous Waste Records

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

Keeping proper hazardous waste records is the most effective way to show that you are meeting your hazardous waste obligations and to answer questions about how you have managed your hazardous waste.

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

Do I have to keep paper records?

Hazardous waste records may be kept in any hardcopy or electronic form convenient to you. Paper records may be scanned and kept as electronic images as long as all information is legible. Regardless of format, all records must be legible, complete, and accessible from the site where your hazardous waste is generated whenever the site is operating.

Whether you keep hardcopy or electronic records, ensure that you always have an employee on site who is aware of their location and can access the records.

Which hazardous waste records must I keep?

Your hazardous waste recordkeeping 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>.

All generators must keep:

- Any documentation used to evaluate wastes as non-hazardous. If your wastes were evaluated by a third party, you must have the information they used – the final conclusions are not sufficient. See MPCA fact sheet #w-hw1-01, Evaluate Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf>.
- Weekly hazardous waste inspection logs. See MPCA fact sheet #w-hw1-05, Accumulate Hazardous Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-05.pdf>.
- On-site hazardous waste treatment logs if applicable. See MPCA fact sheet #w-hw1-06, Treat or Dispose of Hazardous Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-06.pdf>.
- Records to show that universal waste has been accumulated on-site for less than a year. See MPCA fact sheet #w-hw4-62, Universal Wastes, at <https://www.pca.state.mn.us/sites/default/files/w-hw4-62.pdf>.
- Hazardous waste shipment and disposal records.
 - Hazardous waste manifests and exception reports. See MPCA fact sheet #w-hw1-07, Manifest Shipments of Hazardous Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-07.pdf>.
 - Used oil shipment receipts. See MPCA fact sheet #w-hw4-30, Used Oil and Related Wastes, at <https://www.pca.state.mn.us/sites/default/files/w-hw4-30.pdf>.
 - Electronics waste (E-waste) shipment records. See MPCA fact sheet #w-hw4-15, Electronic Wastes, at <https://www.pca.state.mn.us/sites/default/files/w-hw4-15.pdf>.
 - Verification that hazardous waste feedstocks and byproducts were legitimately recycled. See MPCA fact sheet #w-hw2-42, Recycling Hazardous Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw2-42.pdf>.

Note: If you generate hazardous waste polychlorinated biphenyls (PCBs), you must meet additional recordkeeping requirements. See MPCA fact sheet #w-hw4-48e, Recordkeeping for PCBs, at <https://www.pca.state.mn.us/sites/default/files/w-hw4-48e.pdf>.

In addition to the records for [all generators](#), **Very Small Quantity Generators (VSQGs)** must keep:

- Training records for any employees subject to Hazardous Materials Regulations (HMR) training, including employees who characterize, package, or label hazardous wastes for shipment on uniform hazardous waste manifests. See MPCA fact sheet #w-hw1-09a, Employee Training for Very Small Quantity Generators, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-09a.pdf>.
- VSQG-only hazardous waste shipment and disposal records.
 - VSQG collection program receipts. See MPCA fact sheet #w-hw2-51, Very Small Quantity Generator Collection Programs, at <https://www.pca.state.mn.us/sites/default/files/w-hw2-51.pdf>.
 - Licensed paint collection site receipts. See MPCA fact sheet #w-hw4-37a, Architectural Paint, at <https://www.pca.state.mn.us/sites/default/files/w-hw4-37a.pdf>.
 - Logs of used solvent being mixed into used oil. See MPCA fact sheet #w-hw4-30, Used Oil and Related Wastes, at <https://www.pca.state.mn.us/sites/default/files/w-hw4-30.pdf>.

In addition to the records for [all generators](#), **Small Quantity Generators (SQGs)** must keep:

- Training records for employees with hazardous waste-related duties. See MPCA fact sheet #w-hw1-09b, Employee Training for Small Quantity Generators, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-09b.pdf>.
- Documentation of emergency response arrangements with local emergency response agencies. 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>.
- Land disposal restriction (LDR) notices. See MPCA fact sheet #w-hw1-07, Manifest Shipments of Hazardous Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-07.pdf>.

In addition to the records for [all generators](#), **Large Quantity Generators (LOGs)** must keep:

- Training records for employees with hazardous waste-related duties, including position descriptions, training plans, and annual refresher training. See MPCA fact sheet #w-hw1-09c, Employee Training for Large Quantity Generators, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-09c.pdf>.
- Hazardous waste contingency plan and documentation of emergency response arrangements with local emergency response agencies. See 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>.
- Land disposal restriction (LDR) notices. See MPCA fact sheet #w-hw1-07, Manifest Shipments of Hazardous Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-07.pdf>.
- Biennial Reports. See MPCA webpage, Biennial Hazardous Waste Report, at <https://www.pca.state.mn.us/waste/biennial-hazardous-waste-report>.

How long must I keep my hazardous waste records?

Most hazardous waste records must be kept for at least three years from the date of the record. Keep all of the hazardous waste records discussed in this fact sheet for at least this long; however, you must keep the two types of records below for longer:

- Waste evaluation records: keep for at least three years from when the final shipment of the waste in the record was shipped from your site.
- Training records: keep for at least three years from when an employee ceased hazardous waste duties.

The MPCA encourages you to keep all hazardous waste records beyond the life of the business.

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	952-496-8177
.....	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/