Self-audit checklists provide businesses with an easy way to review compliance with Minnesota’s environmental laws and rules. However, because the laws and rules are numerous and often complicated, this checklist cannot be a complete guide to legal obligations. You may have obligations that are not covered on this checklist. In the Twin Cities metro area, your county environmental department may have additional hazardous waste requirements.

If you have questions about this checklist or would like a paper copy of any of the fact sheets listed, call the Minnesota Pollution Control Agency (MPCA) Small Business Environmental Assistance Program at 651-282-6143 or 1-800-657-3938.

Is this the right checklist?

- **Large Quantity Generator (LQG)** – More than 2,200 pounds hazardous waste (more than four 55-gallon drums) or more than 2.2 pounds acute hazardous waste generated each month. If this describes your business, use this checklist. If you need additional copies of this checklist, it can be found on the Minnesota Pollution Control Agency (MPCA) website at: [http://www.pca.state.mn.us/index.php/view-document.html?gid=4975](http://www.pca.state.mn.us/index.php/view-document.html?gid=4975).

If you are not an LQG, use one of the following two checklists:

- **Small Quantity Generator (SQG)** – Between 220 and 2,200 pounds hazardous waste generated each month (about one-half to four 55-gallon drums). Less than 2.2 pounds acute hazardous waste generated each month. The checklist for SQGs can be found on the Minnesota Pollution Control Agency (MPCA) website at: [http://www.pca.state.mn.us/index.php/view-document.html?gid=4974](http://www.pca.state.mn.us/index.php/view-document.html?gid=4974).


More information: MPCA hazardous waste fact sheets are online at [http://www.pca.state.mn.us/waste/pubs/business.html](http://www.pca.state.mn.us/waste/pubs/business.html) and can help you:

- Find information on each topic in this checklist – look for the “10 Steps to Compliance”
- Determine if a waste is hazardous using Step 1 of the “10 Steps to Compliance”
- Manage specific hazardous wastes
- Manage used oil, fluorescent lights, electronic wastes, and other wastes with special requirements

Instructions:

- If you answer “Yes,” you are in compliance with the rule discussed in that question.
- If you answer “No,” you are not meeting the requirements of the rule and need to make changes at your business.
- Answer “N/A” if you have determined the rule does not apply to you.

**Licensing**

1. **Do you have a hazardous waste generator identification number, also known as an U.S. Environmental Protection Agency (EPA) ID number or Hazardous Waste ID number?**
   
   Look up your business on the MPCA’s What’s In My Neighborhood webpage if you are unsure: [http://www.pca.state.mn.us/wimn](http://www.pca.state.mn.us/wimn).
   
   - Yes
   - No. Fill out the “Notification of Regulated Waste Activity” form to have one assigned. The form is available at the bottom of the MPCA Hazardous Waste publications webpage at [http://www.pca.state.mn.us/waste/pubs/business.html](http://www.pca.state.mn.us/waste/pubs/business.html).

2. **Is your hazardous waste license up to date?**
   
   Licenses must be renewed annually. In most of Minnesota, the license is issued by the MPCA. If you are in the Twin Cities metro area, the license is issued by your county.
   
   More information: MPCA Hazardous Waste Licensing webpage at [http://www.pca.state.mn.us/dm0r8a6](http://www.pca.state.mn.us/dm0r8a6).
   
   - Yes
   - No
3. Is your hazardous waste license displayed in a public area at the licensed site?
   - Yes
   - No

Waste Evaluation

List your hazardous wastes here:

4. Have you considered all your wastes when determining which ones are hazardous?
   Easy-to-miss hazardous wastes include those that go to the sewer, are recycled on-site, are recycled off-site as a feedstock or byproduct, might be inappropriately disposed of with trash, or are inappropriately managed (such as leaving solvent rags out to dry).
   Don’t forget to report these hazardous wastes on your hazardous waste license application. Hazardous wastes that are sent to the sewer, recycled on site, or recycled off site as feedstock or byproduct are commonly forgotten.
   - Yes
   - No

5. If you have a new waste or make changes that result in a different or changed waste, do you evaluate the waste within 60 days so you know if it is hazardous or non-hazardous?
   Tip: Figure out a way to remind yourself to do the waste evaluation when you make changes or introduce a new product. For example, you could put a monthly reminder in your calendar, or keep a copy of the MPCA fact sheet on how to determine whether a waste is hazardous in the folder with your purchase order forms. MPCA fact sheet #w-hw1-01, “Evaluate Waste” at http://www.pca.state.mn.us/waste/pubs/business.html.
   - Yes
   - No

Labeling


6. Are all hazardous waste storage containers and tanks labeled with the words “Hazardous Waste”?
   - Yes
   - No

7. Are all hazardous waste storage containers and tanks labeled with a clear description of the waste?
   - Yes
   - No

8. Are all hazardous waste storage containers and tanks labeled with the date that waste was first added to the container?
   - Yes
   - No

Storage Requirements


9. Are all hazardous waste storage containers compatible with the waste stored in them?
   Make sure that the containers will not absorb, react with, or be affected by the contents.
   - Yes
   - No
10. Are all hazardous waste storage containers in good condition?
   Use sturdy and strong containers that will not leak if they are bumped by equipment or dropped, especially when they are full. Containers with rust, corrosion, or dents are more likely to leak or break.
   ☐ Yes
   ☐ No

11. Have you protected all hazardous waste storage containers that will deteriorate if left in the sun or rain?
   ☐ Yes
   ☐ No
   ☐ N/A

12. Are all hazardous waste storage containers closed except when waste is being added or removed?
   ‘Closed’ means they will not spill if tipped. Drums have their snap rings locked, funnels latched, or bungs screwed in tight, and snap-lid buckets are completely closed.
   ☐ Yes
   ☐ No

13. Are incompatible wastes separated?
   Separate containers with incompatible contents by using a dike, berm, secondary containment, or distance between the containers.
   ☐ Yes
   ☐ No
   ☐ N/A

14. Is there enough aisle space between hazardous waste containers that you can easily inspect each container and remove a leaking one without moving any others?
   ☐ Yes
   ☐ No

15. Are hazardous waste storage areas protected from accidental damage by vehicles or equipment such as forklifts and pallet jacks?
   ☐ Yes
   ☐ No

16. Are hazardous waste containers that hold free liquids placed on an impermeable surface?
   ‘Impermeable’ means there are no cracks, drains, or sumps that would allow a spill to escape, and the surface will not react with or be damaged by the waste. Solvents and oils will dissolve asphalt, so do not store solvents or oils on asphalt. Corrosive materials will eat away at concrete unless it is sealed with a corrosive-resistant epoxy, so do not store corrosive materials on unsealed concrete.
   ☐ Yes
   ☐ No

17. Are floor drains in hazardous waste storage areas sealed to prevent releases?
   The remaining floor drains in your facility can remain open, but they must be managed appropriately. More information: MPCA “Floor Drains and Flammable Traps” fact sheet #w-hw4-18 and MPCA “Land Application of Trap and Holding Tank Wastes” fact sheet #w-sw4-18 at [http://www.pca.state.mn.us/waste/pubs/business.html](http://www.pca.state.mn.us/waste/pubs/business.html).
   ☐ Yes
   ☐ No
   ☐ N/A

18. Do you ship hazardous waste, including acute hazardous wastes, within 90 days of the date waste is first added to the container?
   Storing wastes for more than 90 days makes you a storage facility, which requires a permit and has many additional requirements. Do not exceed the 90-day time limit.
   ☐ Yes
   ☐ No

19. Do you conduct and document the required weekly inspections of hazardous waste storage containers and storage areas?
   An inspection log to document weekly inspections is available in MPCA “Documenting Container Inspections” fact sheet #w-hw2-41 at [http://www.pca.state.mn.us/waste/pubs/business.html](http://www.pca.state.mn.us/waste/pubs/business.html), or you can make your own.
   ☐ Yes
   ☐ No
20. Are ignitable or reactive hazardous wastes kept at least 50 feet from your property line?
   If your property is too small for this to be possible, contact your local fire marshal and follow the fire code requirements.
   □ Yes
   □ No
   □ N/A

21. Additional requirement for outdoor storage:
   For hazardous waste containers stored outdoors, are they in a curbed area?
   Curbing must be sufficient to contain a release.
   □ Yes
   □ No
   □ N/A

22. Additional requirement for outdoor storage:
   Are hazardous waste containers that are stored outdoors protected from unauthorized access?
   □ Yes
   □ No
   □ N/A

23. Additional requirement for outdoor storage:
   Are ignitable or reactive hazardous wastes that are stored outdoors stored under roofing to protect them from precipitation and overheating?
   □ Yes
   □ No
   □ N/A

Satellite Accumulation


List your satellite hazardous wastes here:

24. For satellite accumulation containers, do you accumulate 55 gallons or less of each hazardous waste at each point of generation?
   □ Yes
   □ No
   □ N/A

25. Are satellite accumulation containers labeled with the words “Hazardous Waste” and a clear description of the waste?
   □ Yes
   □ No
   □ N/A

26. For satellite accumulation containers located away from the point of generation, are they inspected weekly and documented?
   Satellite accumulation containers must either be under the direct control of the operator and visually inspected daily, or inspected weekly and the inspections documented.
   □ Yes
   □ No
   □ N/A
27. For full satellite accumulation containers, is the fill date marked on the containers?
   - Yes
   - No
   - N/A

28. For full satellite accumulation containers, are they moved to the hazardous waste storage area within three days of the fill date?
   - Yes
   - No
   - N/A

Used Oil

Used oil and oily wastes are common problem areas during inspections. This section covers only the most frequent violations for used oil storage. For more complete guidance, there are used oil fact sheets on the MPCA Hazardous Waste Publications webpage at http://www.pca.state.mn.us/waste/pubs/business.html. The fact sheets discuss the rules for used oil storage, marketing, burning, and transporting.

List your used oil and oily wastes here:

29. Are all used oil storage containers and tanks labeled with the words “Used oil,” “Used oily waste,” or “Used oil filters”?
   - Yes
   - No
   - N/A

30. Are all containers of used oil and oily wastes in good condition?
    Use sturdy and strong containers that will not leak if they are bumped by equipment or dropped, especially when they are full. Containers with rust, corrosion, or dents are more likely to leak or break.
    - Yes
    - No
    - N/A

31. Are all containers of used oil and oily wastes closed except when waste is being added or removed?
    ‘Closed’ means they will not spill if tipped – drums have their snap rings locked, funnels latched, or bungs screwed in tight, and snap-lid buckets are completely closed.
    - Yes
    - No
    - N/A

32. Are all containers of used oil and oily wastes placed on a reasonably impermeable surface?
    ‘Impermeable’ means there are no cracks, drains, or sumps that would allow a spill to escape, and the surface will not react with or be damaged by the waste. Oil will dissolve an asphalt surface, so asphalt is not acceptable for storing containers of used oil.
    - Yes
    - No
    - N/A

33. When you clean up oil spills, whether indoors or outdoors, do you make sure the oily wastes (such as kitty litter, floor dry, or dirt) are disposed of as oily waste?
    Do not dispose of these wastes with your trash.
    - Yes
    - No
    - N/A

34. Since used oil that will be recycled doesn’t require a manifest to ship, do you make sure you keep receipts or a log of each shipment?
    - Yes
    - No
    - N/A
List your universal wastes here:

35. Are universal wastes or their containers labeled "Universal Waste -- [type of waste]," "Waste [type of waste]," or "Used [type of waste]"?
   For example, "Universal Waste – fluorescent lights" or "Used batteries."
   ☐ Yes
   ☐ No
   ☐ N/A

36. Are universal wastes stored in closed containers that are structurally sound, adequate to prevent breakage, and compatible with the waste?
   ☐ Yes
   ☐ No
   ☐ N/A

37. Are universal waste containers in good condition and free of leaks, spills, or damage?
   ☐ Yes
   ☐ No
   ☐ N/A

38. Do you keep universal waste for one year or less?
   Tip: To keep track of how long you have kept it, mark the waste with the date it was generated or keep a log.
   ☐ Yes
   ☐ No
   ☐ N/A

39. Are leaking or damaged universal waste batteries stored in a closed container that is structurally sound and compatible with the waste?
   Common types of universal waste batteries are lead-acid, NiCad, and lithium >9 volts.
   ☐ Yes
   ☐ No
   ☐ N/A

40. Are broken fluorescent light bulbs stored in a closed container?
   A PVC pipe with endcaps can be used to store used fluorescent light bulbs, including those with broken tips. Fluorescent light bulbs that have accidentally shattered should be stored in an airtight container that will hold the small pieces of glass (do not use a cardboard box or plastic bag). Do not intentionally break fluorescent bulbs.
   ☐ Yes
   ☐ No
   ☐ N/A

Disposal and Shipping


41. Before hazardous wastes leave your site, do you make sure:
   • The waste is properly identified, labeled, and packaged for transport.
   • The waste is properly loaded and secured in the transport vehicle.
   • The vehicle displays required placards if necessary. If placards are required, prepare and maintain a transportation security plan.
   ☐ Yes
   ☐ No
42. Does your hazardous waste hauler meet the following requirements?

- Has a Hazardous Waste ID number
- Meets U.S. Department of Transportation qualifications for vehicle operators
- Maintains adequate liability insurance
- Transports the waste to a permitted facility
- Registered with the Alliance for Uniform Hazardous Materials Transportation Procedures if it will transport your waste to or through any of the participating states (as of 2014: Michigan, Nevada, Ohio, Oklahoma, and West Virginia)

☐ Yes  ☐ No  ☐ N/A

43. If you dispose of hazardous waste to the sewer (down the drain), have you notified your municipal waste water treatment plant?

Follow your waste water treatment plant’s requirements. This may include pretreatment requirements or restrictions on volume. Remember to report these often-forgotten wastes on your annual license application. Do not dispose of hazardous waste to a septic system.


☐ Yes  ☐ No  ☐ N/A

44. Do you make sure empty containers meet the following three requirements before recycling them or disposing of them with solid waste?

- All the waste that can be removed has been removed
- Less than 3% of the original weight remains in containers that hold 119 gallons or less, or less than 0.3% of the original weight remains in containers that hold more than 119 gallons
- Allowed by your recycler or solid waste hauler

☐ Yes  ☐ No  ☐ N/A

Manifests


45. Are all shipments of hazardous waste made using a Uniform Hazardous Waste Manifest?

Some wastes, such as used oil that will be recycled and universal wastes, may be shipped using shipping papers rather than a manifest.

☐ Yes  ☐ No

46. Before your waste is loaded on the transporter’s vehicle, do you double check that the information on your manifest is accurate and complete?

Although most hazardous waste transporters will pre-fill a manifest with your information, you remain responsible for its accuracy.

☐ Yes  ☐ No

47. Do you make sure the manifest is signed?

☐ Yes  ☐ No

48. Do you make sure all six pages of the manifest are legible before the shipment leaves your site?

☐ Yes  ☐ No

49. After your transporter has signed and dated the manifest, do you copy the “Generator Initial Copy” (also known the “two-signature page”) and send it to the MPCA within five days of shipment?

☐ Yes  ☐ No
50. After you receive a signed and dated copy of the “Designated Facility to Generator Copy” (also known as the “three-signature page”), do you make sure that you, your transporter, or the facility mail a legible photocopy to the MPCA within 40 days of the facility’s acceptance of the waste?

☐ Yes
☐ No

51. Do you submit an exception report to the MPCA if you do not receive the “Designated Facility to Generator Copy” (also known as the “three-signature page”) back from the destination facility within 45 days of shipment?

☐ Yes
☐ No
☐ N/A

52. If you export your hazardous waste, do you follow all applicable rules for notification, consent, EPA acknowledgement of consent, and shipping papers/manifests?

☐ Yes
☐ No
☐ N/A

More information on requirements for exporting hazardous waste can be found by searching for “MN Rule 7045.0302” on the internet.

Emergency Planning and Preparedness


Report leaks or spills that might pollute the air, land, or water immediately to the Minnesota Duty Officer at 651-649-5451 or 1-800-422-0798.

The duty officer is available 24 hours a day.

Call fire, police, ambulance, or cleanup services as needed.

The duty officer does not contact them for you.

If in doubt, report.

53. Do you provide immediate access to emergency communications for employees working with hazardous waste?

Examples include an alarm call button or telephone in a storage room, having employees carry hand-held radios or cell phones, or having employees use a ‘buddy system’ so that an employee working with hazardous waste is always within voice contact of another employee outside of the hazardous waste area.

☐ Yes
☐ No

54. Do you have a suitable communication system to provide emergency instructions to company personnel?

For small shops, the human voice may be sufficient. For larger shops an intercom, loudspeaker, alarm system, or telephone may be needed.

☐ Yes
☐ No

55. Is a telephone or radio available on site for employees to contact emergency responders?

☐ Yes
☐ No

56. Do you keep emergency and spill equipment (such as fire extinguishers, absorbent materials, and spill containers) in or near the hazardous waste storage area?

☐ Yes
☐ No

57. Is emergency and spill equipment appropriate for the type and amount of wastes on site?

☐ Yes
☐ No
58. Is emergency and spill equipment in operating condition and accessible at all times?

☐ Yes
☐ No

59. Is emergency equipment tested and maintained according to the manufacturer’s instructions?

☐ Yes
☐ No

60. Are fire protection systems, including all portable fire extinguishers, inspected, and tested at least annually by a licensed inspector?

☐ Yes
☐ No

61. Do you have a written contingency plan available on site?

“Contingency Plan Packet for Large Quantity Generators” at http://www.pca.state.mn.us/waste/pubs/business.html provides a template you can use.

☐ Yes
☐ No

62. Does your contingency plan include the following required information?


- Emergency coordinator, backup coordinators, and current contact information for all coordinators
- List of available emergency equipment
- Procedures to follow during an emergency
- Procedures for reporting the incident to appropriate authorities
- Evacuation plan
- Documented arrangements with local emergency response agencies

☐ Yes
☐ No

63. Is your contingency plan up-to-date?

Update the plan if it fails in an emergency or information in the plan changes. Staff changes and updated phone numbers are often forgotten.

☐ Yes
☐ No

64. Have you submitted a copy of your contingency plan to each of the emergency response agencies identified in the plan?

If your site is located in a Twin Cities metropolitan county, check with your county hazardous waste office to see if they would like a copy of the contingency plan.

☐ Yes
☐ No

65. When you activate your hazardous waste contingency plan, do you submit a written report to the MPCA or your Twin Cities metropolitan county hazardous waste program within 15 days of the incident?

☐ Yes
☐ No
☐ N/A

Training


66. Is the person who trains employees knowledgeable about your wastes and Minnesota hazardous waste regulations?

☐ Yes
☐ No

67. Do you train all employees who have hazardous waste management or emergency response duties?

Train employees on waste handling, emergency procedures, and sections of the contingency plan relevant to their job.

☐ Yes
☐ No
68. Are employees trained within six months of the start of their hazardous waste-related duties?
   □ Yes
   □ No

69. Is refresher training completed annually?
   □ Yes
   □ No

70. Do you document the date and content of initial and annual training?
   □ Yes
   □ No

Recordkeeping

71. Do you keep the following required records available for inspection at the licensed site for a minimum of three years?
   The MPCA also strongly recommends keeping SDSs (Safety Data Sheets), correspondence, and all the documents listed below for the life of the business.
   • Copies of license applications
   • Testing and analytical reports (keep for three years after the last time the waste is shipped)
   • Training documents, including which employees fulfill which hazardous waste job duties (keep records for three years after employee leaves)
   • Weekly inspection logs
   • Manifests and/or shipping records
   • Shipping records for used oil, oily waste, and used oil filters (if you have these wastes)
   • Manifest exception reports (if you have any)
   □ Yes
   □ No

You have completed the questions for this checklist.
Review your answers. Make changes at your business to correct any questions marked “No.”

Person completing checklist:
Print name: __________________________________________ Title: __________________________________________
Signature: __________________________________________ Date (mm/dd/yyyy): ____________________________

Notes: