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|  | 4.01 Receiving WastesGeneral Information for HHW Programs |

# 1. Safety

Staff assisting with HHW processing must be trained within six months of hire or be supervised at all times by trained, experienced personnel. Staff should remain alert to suspicious participant behaviors and receive dispute resolution training. Use experienced staff judgment when responding to unique conditions or situations.

**1.1 PPE**

Use engineered solutions to minimize environmental exposure risks. Staff must strictly follow donning [Personal Protective Equipment](https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910SubpartIAppB) (PPE) protocol, including:

* Safety glasses with side shields or goggles
* Footwear protection
* Protective gloves
* Long-sleeved shirt and pants, or equivalent
* Protective Tyvek apron (or equivalent)
* Reflective vests (for mobile events)

**1.2 Ergonomics**

Use safe ergonomic practices during HHW handling, including:

* Avoid bending and twisting when lifting materials from vehicles
* Establish and document program protocol on whether participants can assist in unloading paint containers (e.g., 5-gallon buckets or heavy containers)
* Participants cannot unload chemical wastes as this program does not provide PPE for public use
* Use a cart to transport waste to the waste sorting area

# 2. Evaluating incoming wastes

**2.1 Participant Verification**

Participants must verify the waste is not business generated. Sign in sheets document how many households the HHW came from; this data is later used for annual State reporting and stipend eligibility. Verification may include checking a driver’s license or other acceptable proof of residency.

**2.2 Business generated wastes**

If licensed by the State, this Program may accept from [VSQG](https://www.pca.state.mn.us/sites/default/files/w-hw2-53.pdf) or [minimal quantity generator](https://www.pca.state.mn.us/sites/default/files/w-hw2-53.pdf) (MQG) business waste. If the source is uncertain, have the participant complete a form certifying the waste is not business related. Signs the waste may be business generated include:

* Delivered in a commercial vehicle
* Large quantities of a single product (greater than 5 gallons)
* Waste types are not typically found in residential homes
* In containers labeled ‘for commercial use only’
* Labels that are very plain and/or display [NFPA/GHIS](https://www.bing.com/search?pglt=163&q=NFPA%2FGHIS+pictograms&cvid=53afb66c4fc54be8bc5546cabdb4b49f&gs_lcrp=EgRlZGdlKgYIABBFGDkyBggAEEUYOTIGCAEQRRg6MggIAhDpBxj8VdIBCDUxNDNqMGoxqAIAsAIA&FORM=ANNAB1&PC=W099) pictograms
* Labels containing OSHA Right-to-Know Regulations

# 3. Minnesota Hazardous Waste Rules

Although RCRA governs the collection and management of hazardous wastes, it does not specifically include regulations for HHW. At the state level, Minnesota has adopted its own version of [CFR Part 262](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-I/part-262). The most common HHW rules and statues apply in [7045.0310](https://www.revisor.mn.gov/rules/?id=7045.0310) , [115A.96](https://www.revisor.mn.gov/statutes/?id=115a.96) and [473.811](https://www.revisor.mn.gov/statutes/?id=473.811), which frame the development and operation of HHW Programs in both Metropolitan (metro) and Greater MN counties. HHW rules state that if an entity collects discarded household products that meet HW criteria due to [characteristics](https://www.revisor.mn.gov/rules/?id=7045.0131&format=pdf), are [listed](https://www.revisor.mn.gov/rules/?id=7045.0131), or are toxic or hazardous due to the ingredients contained in them, the collector is then considered a HHW Program and is responsible for proper management, [storage](https://www.pca.state.mn.us/sites/default/files/w-hw1-05.pdf), disposal and [transport](https://www.pca.state.mn.us/sites/default/files/w-hw1-07.pdf) of those materials.

# 4. Very Small Quantity Generator (VSQG) Collection Rules

Some HHW Programs also collect HW from businesses qualifying as a VSQG that generate less than 220 pounds (or approximately 22 gallons) of HW per month. It is up to this HHW Program to determine whether to accept HW from non-household generators (MN Rule [7045.0320](https://www.revisor.mn.gov/rules/?id=7045.0320) applies to licensed HHW VSQG collection sites).

# 5. Metro County Ordinances

The HW business generators are regulated by the Minnesota Pollution Control Agency (MPCA) in greater MN, while the seven MN metro counties are authorized by the EPA to enforce the [HW rules](https://www.revisor.mn.gov/rules/7045/) within their counties and then regulates and licenses through their [ordinances](https://www.revisor.mn.gov/statutes/?id=400.161&year=2016). Each HHW Program should be familiar with their applicable and specific county regulations.

# 6. Joint Powers Agreements (JPA)

The MPCA and Counties develop and sign a [JPA](https://www.revisor.mn.gov/statutes/?id=471.59), which outlines the partnership between the State and County or Regional Program to operate a HHW Program.

# 7. Policy Decisions and Standard Operating Procedures (SOPs)

In addition to statutes, rules, and ordinances, the MPCA develops policy to cover situations where the rules are silent, unclear or where they prevent efficient HHW collection. The HHW SOPs address those specific portions of the MN Rules; the MPCA website includes SOP templates that can be downloaded to individual county files, then should be modified to be site specific. HHW regulations and policy are found: [SOPs](https://www.pca.state.mn.us/business-with-us/household-hazardous-waste-collection), [OSHA](https://www.osha.gov/SLTC/hazardouswaste/standards.html), [EPA](https://www.epa.gov/hw/household-hazardous-waste-hhw) and [DOT](https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-C/part-171).