



# Obtain a Hazardous Waste Identification Number

## Step 3 in the [10 Steps to Hazardous Waste Compliance series](#)

### What is a Hazardous Waste Identification Number?

A *Hazardous Waste Identification Number* (HWID) is a unique number used to simultaneously identify both a physical location at which hazardous waste is generated or handled and the operator of that site. The Minnesota Pollution Control Agency (MPCA) assigns HWIDs in Minnesota. Because the U.S. Environmental Protection Agency (EPA) coordinates this numbering system nationwide, HWIDs are also referred to as *EPA ID#s*.

### Which sites require HWIDs and which sites don't?

In Minnesota, businesses or government agencies must obtain a HWID for each site where hazardous waste is generated, transported, stored, or treated. There are exceptions for certain types of exempt waste, contiguous sites, and cogenerators, which are discussed below:

Table 1.

Situations requiring an HWID or multiple HWIDs	Situations exempt from an HWID or additional HWIDs
<p>All hazardous waste generators, including</p> <ul style="list-style-type: none"> <li>Minimal Quantity Generators (MiniQGs)</li> <li>Very Small Quantity Generators (VSQGs); which in Minnesota replaces the federal Conditionally Exempt Small Quantity Generator (CESQG) category</li> <li>Small Quantity Generators (SQGs)</li> <li>Large Quantity Generators (LQGs)</li> </ul> <p>See MPCA fact sheet #w-hw1-02, Determine Generator Size, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw1-02.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw1-02.pdf</a>.</p>	<p>Sites generating only certain wastes not counted towards hazardous waste generator size. See MPCA fact sheet #w-hw1-02, Determine Generator Size, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw1-02.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw1-02.pdf</a>.</p> <p>Note: Sites generating feedstocks, byproducts, or polychlorinated biphenyls (PCBs) must still obtain an HWID, even though these wastes are not counted towards generator size.</p>
<p>Separate businesses co-located at the same site but that will manage their hazardous waste separately. Each business requires its own HWID.</p>	<p>Separate businesses that are co-located and engaged in a common manufacturing or service operation that have agreed to manage their hazardous waste together, and one of the businesses has already obtained an HWID for the site. See <a href="#">What are Cogenerators?</a> on page 2.</p>
<p>Job sites where hazardous waste is generated by a contractor and will be shipped for disposal directly from the worksite. Either the site business or contractor may obtain an HWID for the site. See <a href="#">What are Cogenerators?</a> on page 2 and also MPCA fact sheet #w-hw3-11, Contractors, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw3-11.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw3-11.pdf</a>.</p>	<p>Job sites where a contractor generating a hazardous waste will transport that waste back to their shop, and the shop already has an HWID. See <a href="#">What are Cogenerators?</a> on page 2 and also MPCA fact sheet #w-hw3-11, Contractors, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw3-11.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw3-11.pdf</a>.</p>
<p>Sites on non-contiguous properties See <a href="#">What makes sites contiguous or non-contiguous?</a> section on page 2.</p>	<p>Additional sites of the same generator on a contiguous property, if all hazardous waste will be shipped from one site that already has an HWID, even if buildings are not connected. See <a href="#">What makes sites contiguous or non-contiguous?</a> section on page 2.</p>
<p>E-waste collectors and processors/recyclers. See MPCA fact sheet #w-hw4-15, Electronic Wastes, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw4-15.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw4-15.pdf</a>.</p>	<p>A site that has an HWID assigned, but where hazardous waste must occasionally be shipped from a portion of the site with a different street address from that to which the HWID is assigned (such as a door of a large building fronting on a different street) may use the assigned HWID. Explain the addresses in Section 14 of the hazardous waste manifest.</p>

## What makes sites contiguous or non-contiguous?

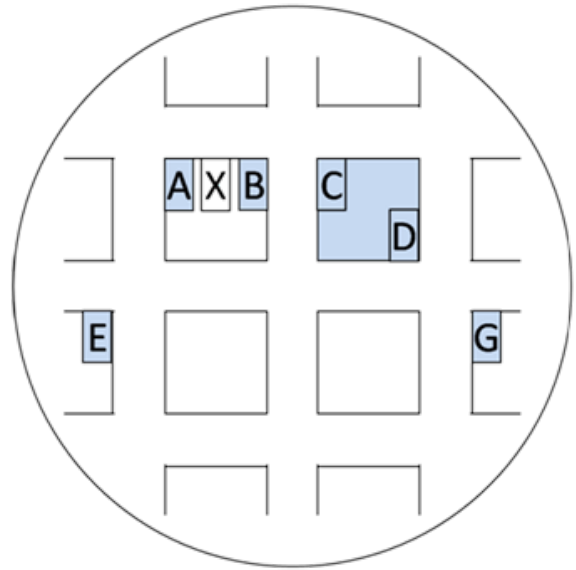
A site is contiguous and may operate under a single HWID if all the property is both:

- Owned or controlled by the hazardous waste operator.
- Immediately adjacent or accessible by only crossing public rights-of-way, such as streets or easements.

Figure 1 illustrates some common HWID scenarios. Shaded areas represent property owned or controlled by one business separated by public rights-of-way. White areas represent property owned by other businesses. The lettered areas represent sites where hazardous waste is handled. (Note: the letter 'F' is omitted for visual clarity.)

**Figure 1. Contiguous and non-contiguous sites**

- Sites A and B are non-contiguous because they are separated by another party's property. Each would require a separate HWID.
- Sites B and C are contiguous because they are accessible by only crossing the public right of way. They may be operated under a single HWID.
- Sites C and D are contiguous because they are located on a single property, even though the buildings are not connected. They may be operated under a single HWID.
- Sites D and G are contiguous because they are accessible by only diagonally crossing the intersection of two public right of ways. They may be operated under a single HWID.
- Sites A and E are non-contiguous because waste would be required to travel along a public right of way which does not border the generator's sites. Each would require a separate HWID.



Note: If a generator with multiple sites on a contiguous property (such as different buildings on a corporate or academic campus) wishes to manage hazardous waste at some of those sites separately, multiple HWIDs may be requested and issued, however multiple HWIDs may not be used to lower the generator's regulated status or avoid regulatory requirements.

## What are cogenerators?

At some sites, two or more businesses may jointly generate hazardous waste. Both businesses are considered cogenerators of the waste, and are equally liable for its management and all applicable hazardous waste requirements. Cogeneration can occur:

- Intentionally, such as when one business owns and manages a factory that generates a hazardous waste, but the equipment inside is operated by employees of another business.
- Accidentally, such as if a shipment of material owned by a business is damaged in transit by a different transporting business and requires disposal as a hazardous waste.

Only one HWID is needed for each site of cogeneration. Though both cogenerators are responsible for ensuring an HWID is obtained, the MPCA encourages cogenerators to identify one primary party for waste duties and to document this selection. Remember that both the site business and contractor remain cogenerators and equally liable for all hazardous waste management regardless of whose name the HWID is under.

A special instance of cogenerators is when contractors work temporarily at a business's site. The worksite does not need an HWID if the contractor is eligible to take the hazardous waste the contract work generated back to their shop, consolidate it, and manage it from there under the shop's HWID. See [Table 1](#) on page 1.

## How do I obtain an HWID?

To obtain an HWID, use the MPCA's online e-Services Notification of Regulated Waste Activity tool at <https://www.pca.state.mn.us/sites/default/files/w-hw5-12.pdf>.

There is no fee to obtain an HWID. Obtaining an HWID will not make your site liable for any additional regulation it is not already required to comply with.

If you cannot use the online tool, you may contact the MPCA to request a paper form be mailed to you. See [More Information](#) on page 4.

In an emergency situation, contact the MPCA to request an expedited HWID issuance.

## Can I use the HWID of the site I bought or moved into?

HWIDs simultaneously identify both a physical location where hazardous waste is generated or handled and the operator of that site. Therefore, when the operator of a site changes, the HWID also must be changed or reissued. Continuing to use the HWID of a former site operator without the MPCA reissuing it may transfer liability for past actions of the former operator to you as the new owner or tenant.

If you purchase a business or move into a site, do not use the HWID assigned to the prior business or operator of the site unless it is reissued to you by the MPCA. Request an HWID from the MPCA using the [e-Services Notification of Regulated Waste Activity](#) tool.

## What if I sell, close, or move my business?

When your business is sold, closes, or moves to another site, submit an inactivation notification for the original site to the MPCA using the [e-Services Notification of Regulated Waste Activity](#) tool.

HWIDs are site-specific and cannot be transferred or moved to a new site. Obtain a new HWID for the new site by submitting an initial notification to the MPCA using the [e-Services Notification of Regulated Waste Activity](#) tool.

## How can I check an HWID?

You may check the HWID for any site in Minnesota using the MPCA's:

- Search the Hazardous Waste Identification Number database tool at <https://www.pca.state.mn.us/waste/hazardous-waste-identification-number-search>.
- MPCA's Hazardous Waste Generator License Application Database tool at <http://cf.pca.state.mn.us/waste/hw/hazardousReport.cfm>.
- MPCA's What's In My Neighborhood search or mapping tools at <https://www.pca.state.mn.us/data/whats-my-neighborhood>.

You may also check the HWID for any site nationwide using the U.S. Environmental Protection Agency's (EPA):

- Enforcement and Compliance History Online (ECHO) tool available through the EPA's website at <http://www.epa.gov>.
- Envirofacts RCRAInfo Search tool available through the EPA's website at <http://www.epa.gov>.

Note: information obtained from the EPA for sites in Minnesota may lag changes submitted to the MPCA by several weeks.

You may also contact the MPCA to inquire about the HWID for a particular site.

## More information

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

Minnesota's hazardous waste requirements are explained in other factsheets like this one, available at no charge on the MPCA's Hazardous Waste Publications webpage at <https://www.pca.state.mn.us/waste/hazardous-waste-documents-and-forms>.

Contact your Metropolitan County or the MPCA with your questions. The MPCA's Small Business Environmental Assistance Program (SBEAP) can also provide free, confidential regulatory compliance assistance. The Minnesota Technical Assistance Program (MNTAP) can help you reduce your hazardous waste generation and potential need to obtain an HWID.

### Metro County Hazardous Waste Offices

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

### Minnesota Pollution Control Agency

Toll free (all offices).....	1-800-657-3864
All offices.....	651-296-6300
.....	<a href="https://www.pca.state.mn.us/">https://www.pca.state.mn.us/</a>

### Small Business Environmental Assistance

Toll free .....	1-800-657-3938
Metro .....	651-282-6143
.....	<a href="https://www.pca.state.mn.us/sbeap/">https://www.pca.state.mn.us/sbeap/</a>

### Minnesota Technical Assistance Program

Toll free .....	1-800-247-0015
Metro .....	612-624-1300
.....	<a href="http://www.mntap.umn.edu">http://www.mntap.umn.edu</a>