



Accumulate Hazardous Waste

Step 5 in the [10 Steps to Hazardous Waste Compliance series](#)

Generators of hazardous waste may *accumulate* the waste they generate at their site until they can treat it or ship it off site for treatment or disposal. Accumulation is also commonly referred to as *storage*, even though hazardous waste storage technically refers to holding waste that was generated at a different site.

This fact sheet will discuss the hazardous waste accumulation requirements administered by the Minnesota Pollution Control Agency (MPCA) and the Metropolitan Counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington (Metro Counties). However, some hazardous wastes are eligible for reduced accumulation requirements, including electronic, pharmaceutical, and universal wastes and used oil.

Table 1. Hazardous wastes with reduced accumulation requirements

Fact sheet	Title	Address
w-hw4-15	Electronic Waste	https://www.pca.state.mn.us/sites/default/files/w-hw4-15.pdf
w-hw3-36b	Reverse Distribution of Pharmaceuticals	https://www.pca.state.mn.us/sites/default/files/w-hw3-36b.pdf
w-hw4-62	Universal Wastes	https://www.pca.state.mn.us/sites/default/files/w-hw4-62.pdf
w-hw4-30	Used Oil and Related Wastes	https://www.pca.state.mn.us/sites/default/files/w-hw4-30.pdf

How much hazardous waste may I accumulate and for how long?

The length of time and volume of hazardous waste you may accumulate at your site is determined by your site’s regulated 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>.

Table 2. Hazardous waste accumulation volume and time limits

If your site’s generator size is:	you may accumulate up to:	for up to:
Minimal Quantity Generator (MiniQG) or Very Small Quantity Generator (VSQG)	2200 pounds	indefinitely, until the accumulation exceeds 2200 pounds, then for 180 days*.
Small Quantity Generator (SQG)	6600 pounds	180 days from the accumulation start date*.
Large Quantity Generator (LOG)	any amount	90 days from the accumulation start date.

*MiniQGs, VSQGs, and SQGs may retain hazardous waste for an additional 90 days (for a total of 270 days) if the designated destination facility for the waste is located more than 200 miles from the generation site.

Note: Acute hazardous wastes have more complex accumulation requirements. See MPCA fact sheet #w-hw2-02, Managing Acute Hazardous Wastes, at: <https://www.pca.state.mn.us/sites/default/files/w-hw2-02.pdf>.

What if I can’t avoid going beyond these limits?

If circumstances beyond your control, such as a fire at the designated destination facility, prevent you from shipping your hazardous waste off-site within the volume or time limits, you may request a one-time 30-day extension from the MPCA or your Metro County. Submit a written request before the limits are exceeded, describing the circumstances and your documented efforts to ship the waste within the normal limits. Contact the MPCA or your Metro County to find out where to send requests. See [More information](#) on page 5.

Do I have to count the weight of containers towards the volume limit?

No, you only need to count the net mass of hazardous waste or residue in a container, not the weight of the container itself. If you do not have the exact weight of the empty container, called the tare weight, or the exact net weight of the waste in a container, you may use a reasonable estimate that is based on other documented measurements.

If your hazardous waste is comingled with a non-hazardous waste or another material, and can be separated out, you only need to count the net mass of the hazardous waste.

What is the accumulation start date?

For tanks and most hazardous waste containers, the *accumulation start date* is the day you first placed the hazardous waste it currently holds into the container or tank.

The accumulation start date for satellite accumulation containers is either: the date the applicable volume limit (1 quart of acute hazardous waste, 55 gallons of any other hazardous waste) is reached, or the date you begin to manage a container as a standard accumulation container, whichever occurs first. Until then, satellite accumulation containers do not have an accumulation start date. See [What is satellite accumulation?](#) on page 4.

The accumulation start date for hazardous waste you receive back from your designated destination facility in a rejected shipment is the date you receive the load. See [How do I handle waste from rejected shipments?](#) on page 5.

What may I accumulate hazardous waste in?

Hazardous waste may be accumulated in either portable *containers* or stationary *tanks*.

Note: If hazardous waste is left in the process equipment in which it was generated for more than 90 days after the equipment ceases to be operated, then the process equipment is also considered a hazardous waste container or tank, and must meet these accumulation standards.

Containers and tanks must be:

- In good condition and leakproof.
- Compatible with the waste they hold.
- Strong enough to contain the waste they hold; for containers even if dropped while filled.
- Labeled.

How must I label hazardous waste containers and tanks?

Each hazardous waste container or tank must be legibly labeled with the:

- Words "Hazardous waste".
- Description that clearly identifies the contents to employees and emergency responders.
- Accumulation start date, if the container is not a satellite accumulation container, or if it has exceeded the satellite accumulation volume limit.

Hazardous waste labels have no required colors, format, or size, but must be clearly visible without moving containers. If it is not reasonably possible to see the label on a specific container or tank, keep the label information in a clearly visible designated record in the immediate area.

May I keep hazardous waste containers open?

No, you must keep hazardous waste containers closed at all times except when adding or removing waste from the container.

Closed means that the lid of the container is secured such that no waste would be released if the container were dropped or overturned. Physical fastening is required; lids that shut by gravity alone is insufficient.

Note: The MPCA has allowed pharmaceutical waste satellite accumulation containers at healthcare providers that are key-secured in permanent enclosures to remain open until removed from the enclosure.

Where may I keep hazardous waste containers?

You may keep hazardous waste containers anywhere in your facility that meets these requirements:

- The surface under the containers must be impermeable to the waste.
- The surface under the containers must be able to contain the waste and prevent it from reaching the environment if the containers in the area were breached. If outdoors, you must use integral curbing or spill trays. If indoors, you may instead use separation distance from the containers to the nearest opening (doors, unsealed floor drains, cracks in the flooring), so that if the containers were breached, no waste would reasonably flow to the nearest opening.
- *Aisle space* is wide enough that any hazardous waste container can be accessed with appropriate emergency equipment without moving any other containers, equipment, or material.
- Emergency equipment appropriate to the waste must be immediately available, such as portable fire extinguishers, employee decontamination equipment, and spill response materials. Ensure that the emergency equipment is adequate to respond to a breach of the hazardous waste containers in the area and has enough aisle space to be easily reached.
- A way for employees handling hazardous waste to call for help must be immediately available.
Note: A fire alarm pull does not satisfy this standard. For more information about emergency equipment and communications, see MPCA fact sheets:

Fact sheet	Emergency Planning for	Address
w-hw1-08a	Very Small Quantity Generators	https://www.pca.state.mn.us/sites/default/files/w-hw1-08a.pdf
w-hw1-08b	Small Quantity Generators	https://www.pca.state.mn.us/sites/default/files/w-hw1-08b.pdf
w-hw1-08c	Large Quantity Generators	https://www.pca.state.mn.us/sites/default/files/w-hw1-08c.pdf

- Containers must be protected from inadvertent damage by equipment and vehicles.
- Incompatible wastes must be separated by curbing, spill trays, or separation distance, such that if containers of both wastes were breached, none of the contents could reasonably mix.
- Reactive or ignitable wastes must be kept at least 50 feet from the site's property lines, both indoors and out. If your property is too narrow to allow this, you must instead meet the applicable setback requirements of the Minnesota State Fire Code. For questions about the Fire Code, contact your local fire marshal or the State Fire Marshal. See [More information](#) on page 5.
- If outdoors, the containers must be secured against unauthorized access.
- If outdoors, temperature-sensitive and moisture-sensitive wastes, such as ignitable or water-reactive materials, must have overhead roofing. Tarping on the containers does not meet this standard.

These requirements apply to both standard accumulation and satellite accumulation areas. You may have as many hazardous waste accumulation areas at your site as needed.

What is satellite accumulation?

Satellite accumulation of hazardous waste allows you to accumulate up to 55 gallons of most hazardous wastes and 1 quart of acute hazardous waste without attaching an accumulation start date to the containers or counting it towards your accumulation volume limit. The 55 gallon or 1 quart limits apply separately to each waste stream in an area managed as satellite accumulation. Minnesota allows wastes from satellite accumulation containers to be consolidated into a new satellite accumulation container.

Satellite accumulation containers must either be:

- Within the immediate working area of the process generating the waste and under the direct physical and visual control of the operator of that process.
- Inspected each calendar week and records kept, just like standard accumulation containers.

All hazardous waste container requirements discussed in this fact sheet, other than inspections and accumulation start date, apply to satellite accumulation containers.

Note: Though employees at SQGs and LOGs working solely with satellite accumulation containers with no other hazardous waste duties (such as evaluation or inspections) are exempted from hazardous waste employee training requirements, the MPCA still encourages such employees to be trained, as it is the best way to avoid improper hazardous waste management.

Are inspections of hazardous waste containers and tanks needed?

Containers must be inspected at least each calendar week, except for satellite accumulation containers in the immediate waste-generation area as discussed above. Every inspection must check all the container requirements discussed in this fact sheet, including labeling, closure, containment, and condition.

Tanks must be inspected:

- Every working day, for the inflow, outflow, level and freeboard measurements, and pressure gauges.
- Each calendar week, for corrosion and general condition of the tank and secondary containment areas.

Keep records of all inspections, including any issues found. Maintain these records for at least three years.

A fillable example of a container inspection record is available in MPCA fact sheet #w-hw2-41, Documenting Hazardous Waste Container Inspections, at: <https://www.pca.state.mn.us/sites/default/files/w-hw2-41.doc>.

What are the requirements for hazardous waste tanks?

In addition to being in good condition, leakproof, compatible with the waste they hold, labeled, and inspected as discussed above, tanks at VSQGs and SQGs must also meet these requirements:

- Open-topped tanks have at least 24 inches (2 feet) of freeboard at all times, or secondary containment is present for the volume of the top 24 inches of the tank.
- Continuously-fed tanks must be equipped with inflow cutoff or bypass devices.
- VSQGs and SQGs may not use tanks to accumulate ignitable or reactive hazardous wastes, unless they meet one of the following conditions:
 - The waste is treated on-site to no longer be ignitable or reactive.
 - If the waste is ignitable, the tank is protected from electrical spark and other ignition sources and from excessive heat.
 - If the waste is water-reactive, the tank contents are segregated from any contact with rinse water or wastewater.
 - The tank is used solely for emergencies.
- Covered tanks used to accumulate ignitable or reactive hazardous wastes must meet the buffer zone spacing in the Minnesota State Fire Code. For questions about the Fire Code, contact your local fire marshal or the State Fire Marshal. See [More information](#) on page 5.

In addition to being in good condition, leakproof, compatible with the waste they hold, labeled, and inspected as discussed above, tanks at LQGs must also meet these requirements:

- Secondary containment for the maximum capacity of each tank must be present.
Note: Tanks used solely for solid hazardous waste containing no free liquid and located inside a building with an impermeable floor do not need to meet this requirement.
- For tanks constructed or placed into service after 1988, the generator must obtain a written, certified assessment from an independent, qualified, registered professional engineer attesting to the integrity of the tank system and its installation.
- Any tank that has leaked or spilled must be immediately removed from service until repairs are made.
- After any extensive alteration or repair of a tank or its secondary containment system, and before placing the tank back into service, the generator must obtain a written, certified reassessment from an independent, qualified, registered professional engineer attesting to the integrity of the alterations or repairs and their effect on the tank system.

How do I handle waste from rejected shipments?

Rarely, your designated destination facility may determine after your waste is shipped that it cannot accept your waste, such as when the facility has a problem or finds previously unknown contaminants in your waste. The facility may return your waste to you as *rejected shipment*. See MPCA fact sheet #w-hw1-06, Treat of Dispose of Hazardous Waste, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-06.pdf>.

You may accumulate waste from rejected shipments on your site while you find a different destination facility to ship it to. Count the waste from rejected shipments towards your accumulation time and volume limits. You may not manage this waste as satellite accumulation.

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 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/

State Fire Marshal

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

Minnesota Pollution Control Agency

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

Minnesota Duty Officer

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

Small Business Environmental Assistance Program

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

Minnesota Technical Assistance Program

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