



Treat or Dispose of Hazardous Waste

Step 6 in the [10 Steps to Hazardous Waste Compliance series](#)

Generators of hazardous waste may treat their waste on-site or ship it off site for treatment or disposal. Though generators remain liable for their hazardous waste permanently, choosing the most appropriate treatment or disposal for your waste can minimize your risk.

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

What are my hazardous waste treatment and disposal options?

Your hazardous waste treatment and disposal options 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>.

Table 1. Hazardous waste treatment and disposal options

If your site is a:	then you may manage your hazardous waste by:
Large Quantity Generator (LOG); or Small Quantity Generator (SQG)	<ul style="list-style-type: none"> • Shipment to a permitted Treatment, Storage, or Disposal Facility (TSDF) using a uniform hazardous waste manifest. 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. • Shipment to a legitimate recycling facility using a uniform hazardous waste manifest. See MPCA fact sheet #w-hw2-42, Recycling Hazardous Waste, at https://www.pca.state.mn.us/sites/default/files/w-hw2-42.pdf. • Use as an eligible feedstock or byproduct. A uniform hazardous waste manifest is not needed for shipment. See MPCA fact sheet #w-hw2-42, Recycling Hazardous Waste, at https://www.pca.state.mn.us/sites/default/files/w-hw2-42.pdf. • Treatment on-site in a container or tank. Preapproval from the MPCA or Metro County may be required. See Can I treat my hazardous waste on-site? on the next page. • Discharge to the sanitary sewer. Pre-notification to the receiving Publicly Owned Treatment Works (POTW) is required. See When can I sewer my waste? on page 3.
Very Small Quantity Generator (VSQG)	<p>All of the management methods allowed above, and:</p> <ul style="list-style-type: none"> • Self-transport to a Very Small Quantity Generator Collection Program (VSQGCP) that has agreed to accept the waste. See MPCA fact sheet #w-hw2-51, VSQG Collection Requirements, at https://www.pca.state.mn.us/sites/default/files/w-hw2-51.pdf. • Self-transport of oil-based paint to a Licensed Paint Collection Site (LPCS). See MPCA fact sheet #w-hw4-37a, Architectural Paint, at https://www.pca.state.mn.us/sites/default/files/w-hw4-37a.pdf. • Mixing non-chlorinated, non-paint waste solvents into used oil burned on site or shipped off site as 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
Minimal Quantity Generator (MiniQG)	<p>All of the management methods allowed above, and:</p> <ul style="list-style-type: none"> • Self-transport to a Household Hazardous Waste Collection Program (HHWCP) that has agreed to accept the waste. Contact your county to find local HHWCPs.

Can I treat my hazardous waste on-site?

Closed processes

Without getting approval, you may:

- Reclaim your spent solvent and reuse it again for its intended purpose on-site. Recycling parts washers and paint thinner reclamation units are in this category. See MPCA fact sheet #w-hw4-43, Solvent-based Parts Washers, at <https://www.pca.state.mn.us/sites/default/files/w-hw4-43.pdf>.
- Neutralize your corrosive wastewater in equipment connected to the waste generating process, called an *elementary neutralization unit*. You must perform documented inspections of an elementary neutralization unit according to a written schedule. If you sewer the wastewater after neutralizing it, notify the receiving publicly owned treatment works (POTW) beforehand and follow any conditions they require. See [When can I sewer my waste?](#) on this page.

If you accumulate hazardous waste in the unit before neutralization, ensure that the unit also meets the hazardous waste container or tank requirements. See MPCA fact sheet #w-hw1-05, Accumulate Hazardous Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-05.pdf>.

- Treat hazardous waste in a *totally enclosed treatment facility* (TETF, also known as a totally enclosed treatment unit, or TETU) that is directly connected to an industrial production process. TETFs only include equipment with no vents or openings to the atmosphere. If waste must be manually added to the unit, it does not qualify as a TETF.
- Perform any other hazardous waste treatment in a completely closed container or tank. The container or tank must meet the hazardous waste accumulation requirements. See MPCA fact sheet #w-hw1-05, Accumulate Hazardous Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-05.pdf>.

Open processes

You must request preapproval from the MPCA or Metro County to:

- Evaporate aqueous hazardous waste in an open container or tank, or dewater wet sludge using a dryer.
- React two-part resins or epoxies that must be reacted in an open vessel due to the creation of heat or off-gassing, such as spray-in vehicle liner or insulation foam, to dispose of them. No approval is needed for legitimate use of two-part resins or epoxies.
- Chemically fixate hazardous waste in an open vessel.

To request approval for these open processes, submit this information to the MPCA or your Metro County.

There is not a standardized form:

1. A description of your waste.
2. Your intended treatment method, location, and equipment.
3. An explanation of how hazardous waste constituents will be prevented from being released to the land, water, and air during your treatment.

After any on-site treatment process

After using any on-site treatment process, you must either evaluate the treated waste and document that it is non-hazardous or continue to manage it as a hazardous waste. See MPCA fact sheet #w-hw1-01, Evaluate Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf>.

Burning or burying hazardous waste at your site are prohibited without obtaining a hazardous waste Treatment, Storage, or Disposal Facility (TSDF) permit from the MPCA.

Diluting hazardous waste to attempt to render it non-hazardous is prohibited.

When can I sewer my waste?

You may sewer hazardous waste in Minnesota if you first notify the receiving POTW, and then follow any discharge prohibitions, limits, and reporting schedules they require. There is no statewide form you are required to use; contact your POTW to find out if they have a mandatory form. If you are unsure who your POTW operator is, you can usually find them by contacting your water utility.

The POTW does not need to formally approve your discharge, but before you sewer your waste, you must wait a reasonable period after they receive your notification for them to respond.

If you operate multiple sites, ensure you notify the correct POTW for each site. Every POTW in Minnesota has different waste-handling capabilities, and a hazardous discharge acceptable to one may not be allowed by another. For example, some POTWs will allow discharges of many hazardous wastes, such as methanol; others prohibit some non-hazardous wastes, such as wastewater with a pH between 2 and 5.

If you sewer hazardous wastewater after treating it on-site to remove 80% or more of the hazardous constituents, you do not need to count that wastewater towards your regulated hazardous waste generator size. You must still report this waste to the MPCA. If located in a Metro County, check with your county to determine whether you must report it.

What do I need to do to ship my waste off-site?

You may use any hazardous waste transporter that meets U.S. Department of Transportation (DOT) requirements and has notified the MPCA of its activity. Minnesota no longer licenses hazardous waste transporters. The MPCA encourages generators to perform due diligence before contracting with a hazardous waste transporter, including contacting the MPCA and the state where the designated destination facility you are shipping your waste to is located, to verify that the transporter is authorized to operate in those states.

Before the waste leaves your site, both you and the transporter are responsible for these *pre-transport functions*:

- Prepare a uniform hazardous waste manifest. 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>.
- Characterize, label, and package your waste according to the DOT's Hazardous Materials Regulations (HMR). For questions regarding the HMR, contact the DOT. See [More information](#) on page 4.
- Properly load and secure your waste in the transport vehicle.
- Placard the transport vehicle, if required by the HMR for your particular waste.
- Prepare a hazardous waste security plan, if required by the HMR for your particular shipment.
- Verify that the vehicle operator's qualifications and insurance coverage are sufficient for your particular shipment.

What if the designated destination facility ships my waste back to me?

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 a *rejected shipment*.

You may accumulate waste from rejected shipments on your site while you find a different destination facility to ship it to. See MPCA fact sheet #w-hw1-05, Accumulate Hazardous Waste, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-05.pdf>.

However, you may not send that waste or future hazardous waste of the same type back to the originally intended destination facility unless you establish that either your waste has materially changed or that the facility has received approval to handle your waste type from its state of location or the U.S. Environmental Protection Agency.

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/

Minnesota Technical Assistance Program

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

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 Department of Transportation

Hazardous Materials	651-215-6330
.....	http://www.dot.state.mn.us/cvo/hazmat.html

U.S. Department of Transportation

Hazardous Materials	1-800-467-4922
.....	http://www.phmsa.dot.gov/hazmat