



Summary of Hazardous Waste Requirements

Basic Hazardous Waste Requirements for Minnesota Businesses

Hazardous wastes are materials that your business will discard, or that you cannot use any more for their intended purpose, and that present risks to public health or the environment if improperly managed. This fact sheet will provide basic guidance from the Minnesota Pollution Control Agency (MPCA) regarding statewide hazardous waste requirements and links to more detailed information in other MPCA publications.

Businesses located in the Minneapolis-St. Paul Metropolitan Area counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington (Metro Counties) may be subject to more strict county requirements. See [More information](#) on page 6.

To help you review the basic hazardous waste requirements, the MPCA has divided them into 10 individual steps plus some special wastes, known as the **10+ Steps to Compliance**. Fact sheets for each step are linked from this summary and also available on the MPCA's website at:

<https://www.pca.state.mn.us/waste/hazardous-waste-documents-and-forms>.

You may also view narrated videos of the **10+ Steps to Compliance** published by the MPCA. See MPCA fact sheet #p-tr2-16, Online Training Directions – 10 Steps to Hazardous Waste Compliance, at:

<https://www.pca.state.mn.us/sites/default/files/p-tr2-16.pdf>.

The 10+ steps to compliance

1. Evaluate your waste.
 2. Determine your generator size.
 3. Obtain a Hazardous Waste Identification Number (HWID).
 4. Complete a hazardous waste generator license application.
 5. Accumulate your hazardous waste at your site.
 6. Treat or transport your hazardous waste.
 7. Document your hazardous waste shipments.
 8. Plan for emergencies.
 9. Train your employees.
 10. Keep records.
- Æ Special wastes and other common requirements

Step 1: Evaluate your waste

See MPCA fact sheet #w-hw1-01, Evaluate Waste, at:

<https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf> for detailed guidance.

You must either:

- Assume that each of your wastes is hazardous.
- Examine each of your wastes and document that it is not a hazardous waste. That process is called *evaluation*.

If you do not evaluate and document that a waste is non-hazardous, you must accumulate and dispose of it as a hazardous waste.

Note: Some wastes may be eligible for reduced requirements if managed in certain ways. See [special wastes and related regulations](#) on page 5.

To evaluate a waste as non-hazardous, you must show that it is not **listed** and is also not **characteristic**.

Table 1. hazardous waste lists and characteristics

	Lists and characteristics	Fact sheet web address
Lists	F-List	https://www.pca.state.mn.us/sites/default/files/w-hw2-00.pdf
	K-List	https://www.pca.state.mn.us/sites/default/files/w-hw2-01.pdf
	P-List	https://www.pca.state.mn.us/sites/default/files/w-hw2-02.pdf
	U-List	https://www.pca.state.mn.us/sites/default/files/w-hw2-03.pdf
	PCBs	https://www.pca.state.mn.us/sites/default/files/w-hw4-48a.pdf
Characteristics	Ignitability	https://www.pca.state.mn.us/sites/default/files/w-hw2-04.pdf
	Oxidizer	
	Corrosivity	
	Reactivity	
	Toxicity	
	Lethality	https://www.pca.state.mn.us/sites/default/files/w-hw2-05.pdf

Step 2: Determine your 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> for detailed guidance.

Your site's generator size is determined by the total amount of 'countable' hazardous waste and acute hazardous waste generated each calendar month and year. The hazardous waste requirements applicable to your site depend on its generator size.

Table 2. Generator size based on countable hazardous waste

If your site generates:	Then your site's generator size is:
Less than 100 pounds total per year and no acute hazardous waste	Minimal Quantity Generator (MiniQG) Follows all requirements for VSQGs but is exempt from annual fees. See MPCA fact sheet #w-hw1-50, Minimal Quantity Generators, at https://www.pca.state.mn.us/sites/default/files/w-hw1-50.pdf . Not applicable in all Metro Counties.
Less than 220 pounds total per month and less than 2.2 pounds per month of acute hazardous waste	Very Small Quantity Generator (VSQG) Note: The federal Conditionally Exempt Small Quantity Generator (CESQG) generator size is inapplicable in Minnesota.
Between 220 to 2200 pounds total per month and less than 2.2 pounds per month of acute hazardous waste	Small Quantity Generator (SQG)
More than 2200 pounds total per month or more than 2.2 pounds per month of acute hazardous waste	Large Quantity Generator (LQG)

Step 3: Obtain a Hazardous Waste Identification Number

See MPCA fact sheet #w-hw1-03; Obtain a Hazardous Waste Identification Number, at:

<https://www.pca.state.mn.us/sites/default/files/w-hw1-03.pdf> for detailed guidance.

All Minnesota hazardous waste generators, including MiniQGs, must have a Hazardous Waste Identification Number (HWID) – also known as an *EPA ID Number*.

To get your free HWID, use the MPCA's e-Services. See MPCA fact sheet #w-hw5-12, Notification of Regulated Waste Activity, at: <https://www.pca.state.mn.us/sites/default/files/w-hw5-12.pdf>.

Step 4: Complete a hazardous waste generator license application

See MPCA webpage, Hazardous Waste Licensing, at:

<https://www.pca.state.mn.us/waste/hazardous-waste-licensing> for detailed guidance.

VSOGs, SQGs, and LQGs must submit a hazardous waste generator license application each year.

MiniQGs currently must submit an application every third year. The MPCA sends out application reminders each July. Metro County licensing schedules vary by county.

The MPCA's annual license fees are based on the amount of hazardous waste generated in the preceding calendar year and vary according to generator size. Metro County annual fees vary by county.

Step 5: Accumulate your hazardous waste at your site

See MPCA fact sheet #w-hw1-05, Accumulate Hazardous Waste, at:

<https://www.pca.state.mn.us/sites/default/files/w-hw1-05.pdf> for detailed guidance.

Accumulate your hazardous waste in containers that are compatible with the waste and are able to fully contain the waste, even when dropped or overturned. *Compatible* means the waste will not corrode or degrade the container. Keep containers closed and manually secured except when waste is actually being added to or removed from a container. Do not rely on gravity alone to secure container lids or closures.

Label each hazardous waste container with:

- The words 'Hazardous Waste'
 - A clear description of the waste - that identifies it and its risks to employees and emergency responders
- The accumulation start date - the day the waste was first placed in the container.

Note: Satellite accumulation containers do not have an accumulation start date.

Keep your containers in an area that would hold all the contents of any container if it leaked. Ensure the floor under the containers does not have any cracks or open floor drains. Allow enough room around each container to ensure you can or get to it with emergency equipment without having to move other containers or materials. Perform and document weekly inspections of your hazardous waste containers unless they are satellite accumulation containers under daily control of the operator. You may accumulate hazardous waste on your site up to the volume and time limits in Table 3 below.

If you keep hazardous waste containers outside, meet all of the above requirements; additionally roof, curb, and lock the hazardous waste container area.

Immediately clean up spills. Immediately report any spills that reach the environment to the Minnesota Duty Officer. See [More information](#) on page 6.

Table 3. Hazardous waste accumulation volume and time limits

If your site is a:	You may accumulate up to:	For up to:
MiniQG or VSQG	2200 pounds	Indefinitely, until the accumulation exceeds 2200 pounds, then for 180 days*
SQG	6600 pounds	180 days from the accumulation start date*
LQG	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>.

Step 6: Treat or transport your hazardous waste

See MPCA fact sheet #w-hw1-06, Treat or Dispose of Hazardous Waste Correctly at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-06.pdf> for detailed guidance.

Table 4. Hazardous waste treatment and disposal options

If your site is a:	You may manage your hazardous waste by:
LQG or SQG	<ul style="list-style-type: none"> • Shipment to a permitted hazardous waste 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. If used off-site, 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 is required if the container or tank will be not be closed during treatment. • Discharge to the sanitary sewer. Pre-notification to the receiving Publicly Owned Treatment Works (POTW, commonly known as a sewage treatment plant) is required.
VSQG	<p>All of the allowed 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 and coatings 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. • Mix 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
MiniQG	<p>All of the allowed 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.

Step 7: Document your hazardous waste shipments

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> for detailed guidance.

If you are a VSQG and self-transport your waste, ensure that you meet all applicable requirements of the U.S. Department of Transportation (DOT) Hazardous Materials Regulations (HMR).

See MPCA fact sheet #w-hw2-53, Requirements for Transporting Waste to a VSQG Collection Program, at: <https://www.pca.state.mn.us/sites/default/files/w-hw2-53.pdf>.

Step 8: Plan for emergencies

Table 5. Guidance documents for hazardous waste emergency planning

If your site is a:	For hazardous waste emergency planning guidance, see:
MiniQG or VSQG	https://www.pca.state.mn.us/sites/default/files/w-hw1-08a.pdf
SQG	https://www.pca.state.mn.us/sites/default/files/w-hw1-08b.pdf
LQG	https://www.pca.state.mn.us/sites/default/files/w-hw1-08c.pdf

Step 9: Train your employees

Table 6. Guidance documents for hazardous waste employee training

If your site is a:	For hazardous waste employee training guidance, see:
MiniQG or VSQG	https://www.pca.state.mn.us/sites/default/files/w-hw1-09a.pdf
SQG	https://www.pca.state.mn.us/sites/default/files/w-hw1-09b.pdf
LQG	https://www.pca.state.mn.us/sites/default/files/w-hw1-09c.pdf

Note: The [online hazardous waste presentations](#) or [in-person workshops](#) offered by the MPCA, as well as programs offered by consultants, are only a starting point for your employees' hazardous waste training. You must also document that you train your employees in all the aspects of hazardous waste management unique to your site, including emergency procedures and the specific wastes your site generates.

Step 10: Keep records

See MPCA fact sheet #w-hw1-10, Keep Hazardous Waste Records, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-10.pdf> for detailed guidance.

In general, you must keep any hazardous waste-related record for a minimum of three years after the record is no longer active. As your best protection against liability, the MPCA further recommends that you keep your hazardous waste records for the life of the business. Records may be kept in hardcopy or electronic form.

+ Special wastes and other common requirements

Special wastes

Some hazardous wastes are eligible for management requirements less than discussed in this fact sheet so far.

Table 7. Common Hazardous wastes eligible for reduced management requirements in Minnesota

If you generate:	See:
Antifreeze	https://www.pca.state.mn.us/sites/default/files/w-hw4-02.pdf
Electronics waste (E-waste) that will be recycled	https://www.pca.state.mn.us/sites/default/files/w-hw4-15.pdf
Pharmaceuticals that are reverse-distributed	https://www.pca.state.mn.us/sites/default/files/w-hw3-36b.pdf
Polychlorinated biphenyls (PCBs)	https://www.pca.state.mn.us/sites/default/files/w-hw4-48a.pdf
Recyclable fuel	https://www.pca.state.mn.us/sites/default/files/w-hw4-19.pdf
Scrap metal	https://www.pca.state.mn.us/sites/default/files/w-hw4-27.pdf
Treated wood	https://www.pca.state.mn.us/sites/default/files/w-hw4-67.pdf
Universal waste, including: <ul style="list-style-type: none"> • Aerosol cans • Batteries • Compressed gas cylinders • Dental amalgam that will be recycled • Fluorescent & high intensity discharge lamps • Mercury-containing devices • Pesticides managed through the Minnesota Department of Agriculture • Pretreated dental wastewater 	https://www.pca.state.mn.us/sites/default/files/w-hw4-62.pdf
Used oil and related wastes	https://www.pca.state.mn.us/sites/default/files/w-hw4-30.pdf

Storage tanks

Many hazardous waste generators also store materials in aboveground or underground storage tanks.

See MPCA webpage, Tank Compliance and Assistance Program, at:

<https://www.pca.state.mn.us/waste/tank-compliance-and-assistance-program> for detailed guidance.

Storage tanks that hold hazardous wastes must meet more strict standards. See MPCA fact sheet #w-hw1-05, Accumulate Hazardous Waste, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-05.pdf>.

Stormwater permits

Many businesses are required to either:

- Obtain an Industrial Stormwater Permit from the MPCA.
- Certify their site is eligible for a Conditional No Exposure Exclusion.

Whether your business is subject to the industrial stormwater requirements depends on its Standard Industrial Classification (SIC) code or its regulated activity narrative description. See MPCA webpage, Industrial Stormwater, at: <https://www.pca.state.mn.us/water/industrial-stormwater> for a list of regulated SIC codes and regulated activity narrative descriptions and stormwater permit requirements.

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 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