

Managing waste at law enforcement agencies

Many wastes disposed by law enforcement agencies present risks to human health and the environment if improperly managed. This fact sheet will discuss the hazardous waste requirements for these wastes administered by the Minnesota Pollution Control Agency (MPCA) and the Metropolitan counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington (Metro Counties).

Law enforcement agencies are responsible for disposing of three types of wastes that may be hazardous:

1. Evidence and other seized or confiscated materials that are no longer needed

- [Illicitly manufactured drugs, seized pharmaceuticals, and test kits](#)
- [Plants and fungus](#)
- [Clandestine drug laboratory chemicals](#)
- [Firearms, ammunition, and explosives](#)

2. Collected household wastes

- [Household pharmaceuticals from the Take It to the Box program](#)
- [Firearms and ammunition from 'turn-in' programs](#)
- [Household sharps](#)

3. Maintenance wastes and discarded agency equipment

- [Firearms cleaning solvent and wipes](#)
- [Firearms, ammunition, and explosives](#)
- [Training range residue and debris](#)
- [Pepper spray and chemical agents](#)
- [Batteries, fluorescent and high-intensity discharge lamps, and aerosols](#)
- [Electronics](#)

Assume that any waste you are responsible for is a hazardous waste unless this fact sheet states otherwise or you have evaluated that the waste is non-hazardous. For information on evaluating wastes, see MPCA fact sheet #w-hw1-01, Evaluate Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf>.

Properly accumulate your hazardous wastes until you can dispose of them correctly. See MPCA fact sheet #w-hw1-05, Accumulate Hazardous Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-05.pdf>.

Do not burn wastes at your site or take them to any other site for burning unless specifically discussed in this fact sheet. On-site incinerators and 'burners', including the Drug Terminator™, Drug Incinerator™, FireLake™, Little Helios™/Little Vulcan™, and WiseASH™ are prohibited in Minnesota.

Illicitly manufactured drugs, seized pharmaceuticals, and test kits

Items in this group are not regulated as wastes until they are no longer needed for evidence or you decide to discard them. In addition to illicitly manufactured drugs and seized pharmaceuticals, this group includes contaminated drug paraphernalia such as pipes, scales, and syringes, and used chemical drug test kits, such as the Nik™, NarcoPouch™, NarcoTest™, NARK™, NARTEC™, and DABIT™ tests. During accumulation, ensure that incompatible chemicals in this group, such as the cyanates and strong acids in some test kits, are segregated from each other. When disposed, items in this group must be assumed to be hazardous waste in Minnesota unless individually evaluated as non-hazardous.

You may transport wastes in this group in your agency vehicles to a disposal appointment at the 3M hazardous waste incinerator in Cottage Grove, Minnesota, or to another permitted hazardous waste disposal facility.

You may also transfer this waste to another government law enforcement agency for subsequent transport to an appointment at the 3M hazardous waste incinerator or another permitted hazardous waste disposal facility.

Wastes in this category that do not contain controlled substances may also be managed through a Very Small Quantity Generator (VSQG) collection program. For a list of VSQG Collection Programs and eligibility requirements, see MPCA fact sheet #w-hw2-51, VSQG Collection Programs, at <https://www.pca.state.mn.us/sites/default/files/w-hw2-51.pdf>.

The Minnesota Bureau of Criminal Apprehension schedules all disposal appointments at the 3M hazardous waste incinerator. **Do not contact 3M directly.** To schedule a disposal appointment at the 3M hazardous waste incinerator, complete Minnesota Bureau of Criminal Apprehension (BCA) form #MNLE213FLE, at:

https://dps.mn.gov/divisions/ojp/grants/Documents/APPOINTMENT_REQUEST_FORM_Controlled_Substance_Evidence_Destruction_2013.docx.

**Depending on your computer configuration, you may need to click [Cancel] one or more times on any 'Windows Security' windows that pop up when you use the above link to open the BCA form.*

Send completed forms and contact the BCA with questions at: controlledsubstancesdestruction@state.mn.us.

You may use products intended to render drugs non-retrievable, such as Cactus SmartSink™, ChemGon™, Deterra™, DisposeRx™, DrugBuster™, DrugDisposeAll™, DrugShredder™, RxDestroyer™, and Solidification Processing Unit™, however you must still manage the resulting mixture as a hazardous waste unless you individually evaluate each treated batch as non-hazardous. See the 'Treating hazardous waste at your site' section of MPCA fact sheet #w-hw3-35, Regulatory Consensus on Health Care Issues, at <https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf>.

Do not transport this waste to a solid waste incinerator, including the incinerators in Table 1 - they cannot legally accept these wastes. Report the total volume of this waste annually to your Metro County or the MPCA.

Plants and fungus

This group includes plants and fungus that are regulated or may be potentially regulated as drugs, such as marijuana, khat, coca leaf, kratom, and psilocybin mushrooms, and products of minimal processing derived from those plants, such as hashish, hash oil, and opium. If you are in doubt about whether a plant-derived material contains other chemicals, you may manage these wastes with [illicitly manufactured drugs, seized pharmaceuticals, and test kits](#) as discussed on page 1 instead.

Plants and fungus are not hazardous wastes. Do not report the volume of this waste to your Metro County or MPCA. You may transport it to any permitted solid waste incinerator in or out of Minnesota that has agreed to accept the waste. The Minnesota incinerators listed in Table 1 have notified the MPCA that they will accept plants and fungus and collected household pharmaceuticals from law enforcement agencies. Contact the facility in advance to make arrangements. If transporting outside of Minnesota, contact the incinerator's state for requirements. Incinerators may charge disposal fees.

Table 1. Minnesota solid waste incinerators accepting certain law enforcement wastes

Facility	City	Telephone
Hennepin Energy Recovery Center (Hennepin County only)	Minneapolis	612-348-3777
Perham Resource Recovery Facility	Perham	218-346-4404
Polk County Solid Waste Incinerator	Fosston	218-435-6501
Pope/Douglas Waste-To-Energy Incinerator	Alexandria	320-763-9340
Wilmarth Waste-To-Energy Plant	Mankato	800-895-4999

Clandestine drug laboratory chemicals

Law enforcement agencies and emergency responders are responsible for cleanup of discovered clandestine drug laboratories. The hazardous waste cleanup vendors in [Table 2](#) are available for contract through the Department of Administration's Cooperative Purchasing Venture. Visit the Department's website at <http://www.mmd.admin.state.mn.us/> for more information.

Do not bring these wastes back to your station unless they are needed for investigation or evidence. Ship them from the clandestine drug laboratory site directly for hazardous waste disposal. You may request emergency, temporary, Hazardous Waste Identification Numbers for these sites from the MPCA. See [More information](#) on page 6. You do not need to report these wastes to your Metro County or the MPCA if they are shipped for disposal directly from the laboratory site.

Empty containers and decontaminated glassware from laboratories may be managed in your normal solid waste. Manage decontaminated electronics, such as digital scales, as [electronics](#) as discussed on page 6.

Table 2. Cooperative Purchasing Venture hazardous waste cleanup vendors

Vendor	Telephone
Bay West, Inc.	800-279-0456
West Central Environmental Consultants, Inc.	888-923-2778

Firearms, ammunition, and explosives

Unloaded firearms may be considered non-hazardous once electronic accessories have been removed. You may destroy firearms at any suitable scrap metal facility. Contact the facility in advance to make arrangements for destruction.

Unusable ammunition, propellant, flares, and explosives such as 'flash-bang' and 'stinger' grenades are hazardous wastes when discarded unless evaluated as non-hazardous. Contract with a hazardous waste disposal vendor to dispose of these wastes, or self-transport them to a VSQG collection program that has agreed to accept the waste. Contact your local VSQG collection program first - not all programs accept ammunition.

For a list of VSQG collection programs and eligibility requirements, see MPCA fact sheet #w-hw2-51, VSQG Collection Programs, at <https://www.pca.state.mn.us/sites/default/files/w-hw2-51.pdf>.

Waste ammunition and fireworks may not be disposed of by burning by a law enforcement agency except:

- **When they present an imminent threat to public safety.** If determined necessary by the Incident Commander, ammunition, fireworks, and explosive devices may be detonated in place without approval or notice to the MPCA or Metro County. If you remove and transport these wastes from the location where they were seized to another site for burning, or remove them to another site and later determine that they cannot be safely shipped with a hazardous waste transporter for proper disposal, contact the MPCA to request an Emergency Hazardous Waste Treatment Permit before burning them.
- **When used for legitimate training exercises.** Legitimate training requires a prepared curriculum, specific training objectives, and post-training assessment. No notice or approval from the MPCA or Metro County is required for legitimate training exercises.

For more information on firearms, ammunition, and explosive wastes, see MPCA fact sheet #w-hw4-04, Ammunition, Fireworks and Explosive Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw4-04.pdf>.

For management of training range wastes, see [Training range residue and debris](#) on page 5.

For management of pepper spray and other chemical agents, see [Pepper spray and chemical agents](#) on page 5.

Household pharmaceuticals from the Take It to the Box program

You may manage household pharmaceuticals separately from seized pharmaceuticals if they were collected in Take It to the Box receptacles, at temporary collection events, or were abandoned at schools and other sites such as temporary housing shelters and voluntarily picked up by your agency.

Abandoned household pharmaceuticals voluntarily picked up from schools and temporary shelters may also be managed with [illicitly manufactured drugs, seized pharmaceuticals, and test kits](#) as discussed on page 1 instead.

You may transport collected household pharmaceuticals to any permitted solid waste incinerator in or out of Minnesota that has agreed to accept the waste. The Minnesota incinerators listed in [Table 1](#) on page 2 have notified the MPCA that they will accept household pharmaceuticals collected by law enforcement. Contact the facility in advance to make arrangements. If transporting outside of Minnesota, contact the incinerator's state for requirements. Incinerators may charge disposal fees. Annually report the amount of household pharmaceuticals you have collected to the MPCA, even if your agency is in a Metro County.

You may use products intended to render pharmaceuticals non-retrievable, such as Cactus SmartSink™, ChemGon™, Deterra™, DrugBuster™, DrugDisposeAll™, DrugShredder™, RxDestroyer™, and Solidification Processing Unit™, however you may not dispose of the resulting mixture in your normal solid waste unless you individually evaluate each treated batch as non-hazardous. See the 'Treating hazardous waste at your site' section of MPCA fact sheet #w-hw3-35, Regulatory Consensus on Health Care Issues, at <https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf>.

Do not pick up household pharmaceuticals from retail pharmacies or healthcare facilities that are operating Household Pharmaceutical Collection Sites. These sites must manage their own collected pharmaceuticals.

Do not take household pharmaceuticals you have collected to a retail pharmacy or healthcare facility. You must manage your collected pharmaceuticals independently.

For more information on household pharmaceutical collection, see MPCA fact sheet #w-hhw2-06, Law Enforcement Guidance Document; Managing household pharmaceuticals, at <https://www.pca.state.mn.us/sites/default/files/w-hhw2-06.pdf>.

Household sharps

Law enforcement agencies are allowed to voluntarily collect household sharps without approval from their Metro County or the MPCA. Agencies are also responsible for any household sharps seized from detainees.

The MPCA recommends that you self-transport collected sharps to a certified infectious waste storage or treatment facility listed in MPCA fact sheet #w-sw4-34, Infectious Waste: Approved waste management vendors and systems in Minnesota, at <https://www.pca.state.mn.us/sites/default/files/w-sw4-34.pdf>, or have them picked up from your site by any of the registered infectious waste transporters listed in that fact sheet.

If self-transport or infectious waste pickup are not feasible for your agency, you may securely close puncture-proof containers of household sharps and place them in your normal solid waste, though this option is discouraged. Check with your solid waste hauler; haulers have the option to refuse pickup of any waste.

Firearms cleaning solvent and wipes

Used solvent and firearms cleaning wipes from firearms maintenance performed at your facility are hazardous wastes unless evaluated as non-hazardous. Contract with a hazardous waste disposal vendor to dispose of these wastes, or self-transport them to a VSQG collection program that has agreed to accept the waste. Report these wastes to your Metro County or the MPCA.

For a list of VSQG Collection Programs and eligibility requirements, see MPCA fact sheet #w-hw2-51, VSQG Collection Programs requirements, at <https://www.pca.state.mn.us/sites/default/files/w-hw2-51.pdf>.

Wastes from firearms maintenance performed by law enforcement officers at home is considered household waste and is not required to be brought back to your facility. Officers are encouraged to manage these wastes through their local household hazardous waste collection program but may dispose of them into their normal solid waste.

Wastes from firearms maintenance performed by law enforcement officers at training ranges are considered regulated hazardous waste, and may either be disposed through the range or returned to your facility. Both the range operator and users are considered co-generators of this waste and are jointly responsible for its proper management.

Training range residue and debris

Manage lead-contaminated training range wastes, such as exhaust filters and backstops, as hazardous waste unless evaluated as non-hazardous. You may be able to ship these wastes to a lead smelter for recycling. Even if recycled, you must still use a hazardous waste manifest and report the waste to your Metro County or the MPCA unless you show it meets the requirements of a hazardous waste feedstock.

For more information on hazardous waste recycling, see MPCA fact sheet #w-hw2-42, Recycling Hazardous Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw2-42.pdf>.

Account for and collect all munitions expended at a live fire training range or incident site. Manage undetonated rounds as hazardous waste as discussed in [Firearms, ammunition, and explosives](#) on page 3.

You are not required to remove o-chlorobenzylidene malononitrile (CS) tear gas or oleoresin capsicum (OC) pepper spray residue or smokeless powder dust from a structure's walls, floors, and ceilings before you demolish it if you dispose of the demolition debris in a permitted solid waste landfill that has agreed to accept the waste.

However, the MPCA encourages abatement of residues from live fire training ranges and incident sites sufficient to protect the health of your and others' employees. You are responsible for the safety of people that may be exposed to the residues, including law enforcement officers, range operators, demolition contractors, haulers, and landfill operators.

If you perform residue abatement, follow directions from munition manufacturer, if available. Contact the Minnesota Occupational Safety and Health Administration (MNOSHA) for guidance regarding employee protection during training range use and cleanup. See [More information](#) on page 6.

For more information on training range wastes, see MPCA fact sheet #w-hw4-04, Ammunition, Fireworks and Explosive Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw4-04.pdf>.

Pepper spray and chemical agents

Manage discarded OC pepper spray and chemical agents such as CS as hazardous wastes unless evaluated as non-hazardous. Contract with a hazardous waste disposal vendor to dispose of these wastes, or self-transport them to a VSQG collection program that has agreed to accept the waste. Report these wastes to your Metro County or the MPCA.

For a list of VSQG collection programs and eligibility requirements, see MPCA fact sheet #w-hw2-51, VSQG Collection Programs requirements, at <https://www.pca.state.mn.us/sites/default/files/w-hw2-51.pdf>.

Batteries, fluorescent and high-intensity discharge lamps, and aerosols

In Minnesota, discarded nickel-cadmium, lithium, and lead-acid batteries, fluorescent and high-intensity discharge, such as sodium vapor and mercury vapor lamps, and products in aerosol containers are considered to be universal wastes.

Transport universal wastes in your agency vehicle to a collection or recycling facility, or contract with a recycling or disposal vendor to properly manage them. Do not dispose of universal wastes into your normal solid waste.

You do not need to report universal wastes to the MPCA. If your facility is located in a Metro County, contact your county to determine if you must report universal wastes to your Metro County.

For more information on universal wastes, see MPCA fact sheet #w-hw4-62, Managing Universal Waste, at <https://www.pca.state.mn.us/sites/default/files/w-hw4-62.pdf>.

The MPCA encourages recycling of alkaline batteries if possible, however you may discard them into your normal solid waste.

Electronics

Electronics, or *E-wastes*, include any equipment with circuit boards that you can no longer use, including law enforcement equipment such as radios, energy-conducting weapons (stun guns), vehicle data terminals, and common office electronics. If you ensure that they are recycled, you do not need to report E-wastes to your Metro County or the MPCA.

Transport E-wastes in your agency vehicle to a collection facility or contract with a recycling vendor to properly manage them. Do not dispose of E-wastes into your normal solid waste.

For more information on E-wastes, see MPCA fact sheet #w-hw4-15, Managing Electronic Wastes, at <https://www.pca.state.mn.us/sites/default/files/w-hw4-15.pdf>.

More information

Guidance and requirements in this fact sheet were compiled from Minn. R. ch. 7045, and incorporate regulatory interpretation decisions made by the MPCA on September 10, 2010; June 21, 2011; January 30, 2013; and February 2, 2016. Visit the Office of the Revisor of Statutes at <https://www.revisor.mn.gov/pubs> to review applicable Minnesota Statutes and Rules.

For more information, contact your metropolitan county hazardous waste office or your nearest MPCA regional hazardous waste staff. In greater Minnesota, your county solid waste officer may be able to provide additional support. For information about waste reduction, contact the Minnesota Technical Assistance Program.

Metro County Hazardous Waste Offices

Anoka	763-324-4260
.....	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	952-496-8177
.....	http://www.scottcountymn.gov/
Washington	651-430-6655
.....	https://www.co.washington.mn.us/

MNOSHA

Toll free	1-800-342-5354
Metro	612-284-5005
.....	http://www.dli.mn.gov/mnosha.asp

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