

Law enforcement wastes

Many wastes disposed by law enforcement agencies present risks to human health and the environment if improperly managed. This fact sheet will discuss the 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).

Common law enforcement wastes and disposal

| page | Drug waste: Incinerate at • Waste-To-Energy (WTE) incinerator See page 4 | Hazardous waste: • State contract • VSQG Collection Program • Commercial vendor | Universal waste: • State contract • VSQG Collection Program • Commercial disposal vendor | Infectious waste: • State contract • VSQG Collection Program • Commercial disposal vendor | Electronic waste: • State contract • Commercial recycling vendor | Scrap metal: Destroy at • Metal foundry • Machine shop |
|---|---|--|---|--|--|---|
| Aerosols & compressed gas cylinders 2 | | | X | | | |
| Ammunition, explosives, fireworks, & incendiaries ... 2 | | X | | | | |
| Batteries 2 | | | X | | | |
| Biohazards (see Sharps/needles & infectious waste) . 6 | | | | X | | |
| Clandestine drug laboratory chemicals 3 | | X | | | | |
| Drugs: Household pharmaceuticals/dropbox 3 | X | | | | | |
| Narcotics/evidence/seized 3 | X | | | | | |
| Test kits 3 | X | | | | | |
| Electronics & electroshock weapons 5 | | | | | X | |
| Firearms 5 | | | | | | X |
| Firearms cleaning solvent & wipes 5 | | X | | | | |
| Fluorescent & high-intensity discharge (HID) lamps .. 5 | | | X | | | |
| Pepper spray & chemical agents 6 | | X | | | | |
| Sharps/needles & infectious waste 6 | | | | X | | |
| Shooting/Training range debris 6 | | X | | | | |
| Vaping devices & e-cigarettes 7 | | X | | | | |

Assume that any waste you are responsible for is a hazardous waste unless this fact sheet states otherwise or you have evaluated the waste as 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>.

Aerosols & compressed gas cylinders

Discarded products in aerosol containers, such as gun cleaner, disinfectant sprays, and paint are universal wastes, a subcategory of hazardous waste. 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.

See [Using the state contract](#) on page 6 and [VSQG Collection Programs](#) on page 7.

Do not dispose of universal wastes into the normal trash. 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. See [More information](#) on page 7.

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>.

Ammunition, explosives, fireworks, & incendiaries

Unusable ammunition, explosives such as 'flash-bang' and 'stinger' grenades, fireworks, and incendiaries are hazardous wastes when discarded unless evaluated as non-hazardous. Contract with a commercial hazardous waste disposal vendor, either independently or through the state contract, to dispose of these wastes.

See [Using the state contract](#) on page 6.

Waste ammunition, explosives, fireworks, and incendiaries 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, explosives, fireworks, and incendiaries may be detonated in place without approval or notice to the MPCA or Metro County. If you remove and transport these wastes from the incident location to another site for burning, or transport them to another site and later determine that they cannot be safely shipped with a hazardous waste vendor 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>.

Batteries

Discarded batteries, such as from radios, radar and lidar guns, electroshock weapons, and mobile devices are universal wastes, a subcategory of hazardous waste. Contract with a recycling or disposal vendor, either independently or through the state contract, to properly manage them. Many Very Small Quantity Generator (VSQG) Collection Programs may also accept batteries.

See [Using the state contract](#) on page 6 and [VSQG Collection Programs](#) on page 7.

Do not dispose universal wastes into the normal trash. Do not report universal wastes to the MPCA. If your facility is located in a Metro County, contact them to determine if you must report universal wastes to them. Do not count universal wastes towards your generator size.

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>.

Clandestine drug laboratory chemicals

Law enforcement agencies are responsible for cleanup of discovered clandestine drug laboratories. Contract with a commercial hazardous waste cleanup vendor, either independently or through the state contract, to dispose of these wastes. See [Using the state contract](#) on page 6.

Do not bring these wastes back to your station unless they are needed for evidence. Ship them from the clandestine drug laboratory site directly for hazardous waste disposal. You will need to request emergency, 'one time generator' Hazardous Waste Identification Numbers (HWIDs) for these sites from the MPCA. Do not use your law enforcement agency HWID for direct shipments. 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.

For more information on HWIDs, 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>

Drugs

Household pharmaceuticals/dropbox collections

Household pharmaceuticals/dropbox collections include any household medications, including controlled substances, prescription medications, and over-the-counter products collected from the public in a dropbox at your site, at temporary collection events, or that have been picked up by your agency after being abandoned at schools or temporary housing shelters.

Do not pick up household pharmaceuticals from retail pharmacies or healthcare facilities that are operating Household Pharmaceutical Collection Sites (dropboxes). 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 household pharmaceuticals independently. Annually report the amount of household pharmaceuticals you have collected to the MPCA, even if your agency is in a Metro County. Do not count household pharmaceuticals towards your generator size.

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>.

You may either dispose household pharmaceuticals/dropbox collections:

- Separately from narcotics/evidence/seized drugs. Currently, more WTE incinerators in Minnesota will accept household pharmaceuticals/dropbox collections than narcotics/evidence/seized drugs; or
- With your narcotics/evidence/seized drugs. If managed together, you may consolidate both groups for transport and disposal, however you must only take them to WTE incinerators that are approved to receive narcotics/evidence/seized drugs. See [WTEs for drug incineration](#) on the next page.

Narcotics/evidence/seized

Narcotics/evidence/seized drugs include any drugs and drug-related wastes your agency has seized or held in evidence for investigations, such as methamphetamine, fentanyl, and heroin, as well as plants and fungus such as marijuana, khat, and psilocybin mushrooms. Only certain WTE incinerators in Minnesota can accept narcotics/evidence/seized drugs. See [WTEs for drug incineration](#) on the next page. Do not report the amount of narcotics/evidence/seized waste to the MPCA or Metro County or count it towards your generator size.

Test kits

Drug test kits include any chemical test that after use may contain controlled substances or other narcotics/evidence/seized drugs, such as the Nik™, NarcoPouch™, NarcoTest™, NARK™, NARTEC™, and DABIT™ tests. Manage test kits waste with your narcotics/evidence/seized drugs.

WTEs for drug incineration

| | Accepts household pharmaceuticals | Approved to receive narcotics/evidence/seized |
|--|-----------------------------------|---|
| Hennepin Energy Recovery Center (HERC) Minneapolis *accepts only from agencies located in Hennepin County https://www.hennepin.us/your-government/facilities/hennepin-energy-recovery-center | X | |
| Olmsted County Waste-to-Energy Facility Rochester *accepts only from members of Southeast Minnesota Violent Crimes Enforcement Team (SEMV CET) https://www.olmstedcounty.gov/residents/garbage-recycling/waste-energy-facility | | X |
| Perham Resource Recovery Facility Perham https://ottertailcountymn.us/content-page/waste-to-energy-perham-resource-recovery-facility/ | X | |
| Polk County Resource Recovery Facility Fosston http://www.co.polk.mn.us/154/Incinerator | X | X |
| Pope/Douglas Solid Waste Management Alexandria https://popedouglasrecycle.com/ | X | X |
| Xcel Energy – Key City/Wilmarth Generating Plant Mankato https://my.xcelenergy.com/customersupport/s/ | X | |
| WTE facility in neighboring state Check if allowed by both facility and state of location | *Contact facility | *Contact facility |

Do not burn drug wastes at your site or take them to a site other than a WTE facility for burning.

On-site incinerators and 'burners', including the Drug Terminator™, Drug Incinerator™, FireLake™, Little Helios™/Little Vulcan™, and WiseASH™ are prohibited in Minnesota.

Procedures:

- Contact WTEs directly at the information above to schedule drug destruction appointments.
- Drugs from multiple law enforcement agencies may be pooled to reduce trips.
- Inspect the drugs to ensure they do not contain any materials unacceptable to the WTE.
- Seal drugs packages prior to transport.
- Follow the WTE's directions for packaging and maximum volume per appointment.
- Transport drugs in your agency vehicle to a WTE incinerator that can receive them.
- Wear personal protection equipment directed by the WTE when on site (such as hearing protection).
- WTEs may or may not charge law enforcement agencies for drug destruction.

On-site treatment products

You may also use products marketed to render drugs non-retrievable, such as the Cactus SmartSink™, ChemGon™, Deterra™, DrugBuster™, DrugDisposeAll™, DrugShredder™, RxDestroyer™, and Solidification Processing Unit™, however you may not dispose of the resulting mixture in your normal trash unless you individually evaluate each treated batch as non-hazardous. See the 'On-site drug destruction products' 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>.

Electronics and electroshock weapons

Electronics, or *E-wastes*, include any equipment with circuit boards that you can no longer use, including radios, mobile devices, vehicle data terminals, common office electronics, and electroshock weapons. Do not report E-wastes to your Metro County or the MPCA and do not count them towards your generator size.

Do not dispose E-wastes into the normal trash. Contract with a commercial electronics recycling vendor, either independently or through the state contract, to dispose of these wastes. See [Using the state contract](#) on page 6.

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>.

Firearms

Unloaded firearms are scrap metal once any electronic accessories such as flashlights and laser sights have been removed. Manage these electronic wastes as E-wastes as discussed above. You may destroy firearms at any suitable scrap metal facility. Contact the facility in advance to make arrangements for destruction.

Note: The Gerdau Ameristeel foundry in St. Paul previously used by many law enforcement agencies in Minnesota for firearms destruction closed in 2020. There are still several iron foundries in Minnesota that may be willing to destroy firearms by melting for law enforcement agencies. In addition, law enforcement agencies may choose to destroy firearms by sawing, grinding, or crushing, which many machine shops may be able to do.

Firearms cleaning solvent & 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 commercial hazardous waste disposal vendor, either independently or through the state contract, to dispose of these wastes, or transport them to a VSQG Collection Program that has agreed to accept the waste. Report these wastes to the MPCA or Metro County and count them towards your generator size.

See [Using the state contract](#) on page 6 and [VSQG Collection Programs](#) on page 7.

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 the 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. See [Shooting/Training range debris](#) on page 6.

Fluorescent & high-intensity discharge (HID) lamps

Discarded fluorescent & high-intensity discharge (HID) lamps, such as xenon flashlight bulbs and sodium vapor security lights, are universal wastes, a subcategory of hazardous waste. Contract with a recycling or disposal vendor, either independently or through the state contract, to properly manage them. Many VSQG Collection Programs may also accept lamps.

See [Using the state contract](#) on page 6 and [VSQG Collection Programs](#) on page 7.

Do not dispose universal wastes into the normal trash. Do not report universal wastes to the MPCA. If your facility is located in a Metro County, contact them to determine if you must report universal wastes to them. Do not count universal wastes towards your generator size.

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>.

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 commercial hazardous waste disposal vendor, either independently or through the state contract, to dispose of these wastes, or transport them to a VSQG Collection Program that has agreed to accept the waste. Report these wastes to your Metro County or the MPCA and count them towards your generator size. See [Using the state contract](#) on page 6 and [VSQG Collection Programs](#) on page 7.

Sharps/needles & infectious waste

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

You may contract with a commercial infectious waste disposal vendor, either independently or through the state contract, to dispose of these wastes. Many VSQG Collection Programs may also accept household sharps. See [Using the state contract](#) on page 6 and [VSQG Collection Programs](#) on page 7.

Find a list of approved commercial infectious waste disposal vendors 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>.

Do not report sharps or other infectious waste to the MPCA or Metro County or count it towards your generator size.

Shooting/Training range debris

Manage lead-contaminated training range wastes, such as exhaust filters, backstops, and firearms cleaning solvent & wipes, 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, report the waste to the MPCA or Metro County, and count it towards your generator size.

Account for and collect all munitions expended at a live fire training range or incident site. See [Ammunition, explosives, fireworks, & incendiaries](#) on page 2.

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 7.

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>.

Using the state contract

Law enforcement agencies, as elements of local government units, may utilize the state hazardous waste and infectious waste disposal vendor contracts instead of independently hiring a commercial vendor. Find links to the contracts (H-69 and (W-192) and the Cooperative Purchasing Venture (CPV) Membership Application Form at: <https://www.pca.state.mn.us/waste/administrative-resources-hhw>.

Vaping devices & e-cigarettes

Vaping devices, also known as e-cigarettes, present a fire risk from inadvertent activation of their heaters or short-circuiting of their batteries, and health risk from the ingredients contained in the vaping liquid, often concentrated nicotine or controlled substances.

Manage vaping devices as hazardous wastes and minimize fire risk by careful packing and storage. Contract with a commercial hazardous waste disposal vendor, either independently or through the state contract, to dispose of these wastes, or transport them to a VSQG Collection Program that has agreed to accept the waste. Report these wastes to your Metro County or the MPCA but do not count them towards your generator size.

See [Using the state contract](#) on page 6 and [VSQG Collection Programs](#) below.

VSQG Collection Programs

VSQG Collection Programs may accept certain hazardous wastes for proper disposal at lower cost than hiring a commercial vendor, with less complexity than using the state contract. VSQG Collection Programs cannot accept drugs, explosives, or ammunition. You must contact a VSQG Collection Program to receive approval for your specific waste type and volume and schedule an appointment. You may transport hazardous waste to a VSQG Collection Program in your agency vehicles without a hazardous waste manifest. Report hazardous waste taken to a VSQG Collection Program to the MPCA or Metro County and count it towards your generator size.

For a list of VSQG Collection Programs and contact information, see MPCA facts sheet #w-hw2-51, Very Small Quantity Generator Collection Programs at: <https://www.pca.state.mn.us/sites/default/files/w-hw2-51.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; February 2, 2016; February 7, 2022; February 16, 2022; and April 8, 2022. 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 |