



# Hazardous scrap metal

## What is hazardous scrap metal?

Some hazardous wastes generated in Minnesota are made of metal that can be recycled, such as lead wheel weights, chrome-plated engine parts, and silver electrodes. Some metal wastes that would otherwise be non-hazardous, such as processed vehicle hulks, drained and crushed used oil filters, and properly punctured aerosol containers, may be contaminated with residual amounts of hazardous wastes. When legitimately recycled, both of these groups may be managed as hazardous scrap metal in Minnesota and are exempt from most hazardous waste requirements.

Hazardous scrap metal eligible for exemption in Minnesota includes bits and pieces of metal parts that may be combined together with solder or bolts that either contain toxic heavy metal alloys such as cadmium, chrome, lead, or silver, or that are contaminated with toxic paint, solvents, or other hazardous waste.

Metal wastes that are ineligible to be managed as hazardous scrap metal include non-metallic or liquid forms, such as metal powder-impregnated rubber or residues from an industrial process, such as smelting. Wastes that are not primarily made of metal, such as printed circuit boards, are not considered hazardous scrap metal in Minnesota even if they contain small amounts of solid metal in or on them. Metallic wastes that contain or are contaminated with other hazardous wastes, such as unprocessed salvage vehicles or used oil filters, are not eligible for exemption until they have been processed.

Table 1 on page two lists examples of wastes eligible to be managed as hazardous scrap metal in Minnesota when recycled, as well as ineligible wastes, and also references additional guidance for these wastes.

**Note:** Some wastes listed in Table 1 that are ineligible to be managed as hazardous scrap metal may still qualify for reduced regulatory requirements. See the referenced MPCA fact sheets for specific criteria.

## Managing hazardous scrap metal eligible for exemption

The Minnesota Pollution Control Agency (MPCA) and the Minneapolis-St. Paul metropolitan area counties (Metro Counties) regulate hazardous scrap metal waste management. Metro Counties may have more stringent requirements. Contact your Metro County for more information about local requirements.

Do not count recycled hazardous scrap metal towards your hazardous waste generator status or report it to the MPCA. Metro Counties may still require reporting. You need not use a hazardous waste manifest when shipping hazardous scrap metal in Minnesota.

Store eligible scrap metal that may leak residual fluids or contaminate stormwater on an impermeable surface; protect it from precipitation. Collect and properly manage any accumulated residual fluid or contaminated stormwater. Immediately clean up any spills of fluid to the ground and manage the debris according to the identity of the released fluid.

Although labeling hazardous scrap metal and containers of small hazardous scrap metal items, such as lead wheel weights or ammunition projectiles, is not required, it can help ensure a container's contents are recycled and not accidentally disposed of.

**Table 1: Examples of wastes eligible to be managed as hazardous scrap metal when recycled and wastes ineligible for the hazardous scrap metal exemptions, even if recycled**

Eligible when recycled	Ineligible	MPCA fact sheets offering more information
Battery cables and plates	Batteries	#w-hw4-62, <a href="http://www.pca.state.mn.us/publications/w-hw4-62.pdf">Managing Universal Wastes</a> <a href="http://www.pca.state.mn.us/publications/w-hw4-62.pdf">http://www.pca.state.mn.us/publications/w-hw4-62.pdf</a>
Deployed vehicle airbags and seatbelt pretensioners	Undeployed airbags and seatbelt pretensioners	#w-hw4-63, <a href="http://www.pca.state.mn.us/publications/w-hw4-63.pdf">Vehicle Dismantling and Salvage</a> <a href="http://www.pca.state.mn.us/publications/w-hw4-63.pdf">http://www.pca.state.mn.us/publications/w-hw4-63.pdf</a>
Drained and crushed used oil filters	Undrained/uncrushed used oil filters	#w-hw4-30, <a href="http://www.pca.state.mn.us/publications/w-hw4-30.pdf">Used Oil and Related Wastes</a> <a href="http://www.pca.state.mn.us/publications/w-hw4-30.pdf">http://www.pca.state.mn.us/publications/w-hw4-30.pdf</a>
Lead wheel weights	Mercury-containing wheel weights	#w-hw4-63, <a href="http://www.pca.state.mn.us/publications/w-hw4-63.pdf">Vehicle Dismantling and Salvage</a> <a href="http://www.pca.state.mn.us/publications/w-hw4-63.pdf">http://www.pca.state.mn.us/publications/w-hw4-63.pdf</a>
Metal containers which meet the hazardous waste definition of an 'empty container'	Containers which do not meet the definition of an 'empty container'	#w-hw4-16, <a href="http://www.pca.state.mn.us/publications/w-hw4-16.pdf">Managing Empty Containers</a> <a href="http://www.pca.state.mn.us/publications/w-hw4-16.pdf">http://www.pca.state.mn.us/publications/w-hw4-16.pdf</a>
Processed appliance carcasses	Unprocessed appliances	#w-hw3-02, <a href="http://www.pca.state.mn.us/publications/w-hw3-02.pdf">Appliance Recycling</a> <a href="http://www.pca.state.mn.us/publications/w-hw3-02.pdf">http://www.pca.state.mn.us/publications/w-hw3-02.pdf</a>
Processed vehicle hulks	Unprocessed salvage vehicles	#w-hw4-63, <a href="http://www.pca.state.mn.us/publications/w-hw4-63.pdf">Vehicle Dismantling and Salvage</a> <a href="http://www.pca.state.mn.us/publications/w-hw4-63.pdf">http://www.pca.state.mn.us/publications/w-hw4-63.pdf</a>
Punctured aerosol containers*	Unpunctured aerosol containers*	#w-hw4-00, <a href="http://www.pca.state.mn.us/publications/w-hw4-00.pdf">Managing Waste Aerosols</a> <a href="http://www.pca.state.mn.us/publications/w-hw4-00.pdf">http://www.pca.state.mn.us/publications/w-hw4-00.pdf</a>
Separated slugs and shot	Assembled ammunition; Used shooting range backstop materials	#w-hw4-04, <a href="http://www.pca.state.mn.us/publications/w-hw4-04.pdf">Ammunition, Fireworks, and Explosive Waste</a> <a href="http://www.pca.state.mn.us/publications/w-hw4-04.pdf">http://www.pca.state.mn.us/publications/w-hw4-04.pdf</a>
Sheet lead used for X-ray shielding in walls	Lead-impregnated rubber and plastic X-ray gowns and aprons	#w-hw3-35, <a href="http://www.pca.state.mn.us/publications/w-hw3-35.pdf">Regulatory Consensus on Health Care Issues</a> <a href="http://www.pca.state.mn.us/publications/w-hw3-35.pdf">http://www.pca.state.mn.us/publications/w-hw3-35.pdf</a>
Solder scraps	Solder dross, wipes, and paste	#w-hw2-42, <a href="http://www.pca.state.mn.us/publications/w-hw2-42.pdf">Recycling Hazardous Waste</a> <a href="http://www.pca.state.mn.us/publications/w-hw2-42.pdf">http://www.pca.state.mn.us/publications/w-hw2-42.pdf</a>
Structural steel with lead paint	Lead paint-contaminated debris and wastewater	#w-hw4-23, <a href="http://www.pca.state.mn.us/publications/w-hw4-23.pdf">Lead Paint Disposal</a> <a href="http://www.pca.state.mn.us/publications/w-hw4-23.pdf">http://www.pca.state.mn.us/publications/w-hw4-23.pdf</a>

\*Unpunctured aerosol containers may still be eligible for management as hazardous scrap metal if you can show that they contain less than 3% of their original contents and either no hazardous propellant or are at atmospheric pressure.

Ineligible	MPCA fact sheets offering more information
Electroplating and other metal-containing sludge, slag, or dross	#w-hw2-42, <a href="http://www.pca.state.mn.us/publications/w-hw2-42.pdf">Recycling Hazardous Waste</a> <a href="http://www.pca.state.mn.us/publications/w-hw2-42.pdf">http://www.pca.state.mn.us/publications/w-hw2-42.pdf</a>
Liquid mercury and dental amalgam	#w-hw4-62, <a href="http://www.pca.state.mn.us/publications/w-hw4-62.pdf">Managing Universal Wastes</a> <a href="http://www.pca.state.mn.us/publications/w-hw4-62.pdf">http://www.pca.state.mn.us/publications/w-hw4-62.pdf</a>
Printed circuit boards	#w-hw4-15, <a href="http://www.pca.state.mn.us/publications/w-hw4-15.pdf">Managing Electronic Wastes</a> <a href="http://www.pca.state.mn.us/publications/w-hw4-15.pdf">http://www.pca.state.mn.us/publications/w-hw4-15.pdf</a>

Some wastes listed in this table as ineligible to be managed as hazardous scrap metal may still qualify for reduced regulatory requirements. See the referenced MPCA fact sheets for specific criteria.

## Keeping records of hazardous scrap metal

While you are not required to keep any specific records of your hazardous scrap metal management, you must be able to demonstrate that your hazardous scrap metal will be/is actually recycled. Keeping records is one way of meeting this requirement and showing that your hazardous scrap metal is eligible for exemption. If you cannot show your hazardous scrap metal will be recycled, you must consider it a fully regulated hazardous waste.

## 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>.

Your metropolitan county and the MPCA have staff available to answer waste management questions. For more information, contact your metropolitan county hazardous waste office or your nearest MPCA regional staff.

### Metro County Hazardous Waste Offices

Anoka .....	763-422-7093
Carver .....	952-361-1800
Dakota .....	952-891-7557
Hennepin .....	612-348-3777
Ramsey .....	651-266-1199
Scott .....	952-496-8475
Washington .....	651-430-6655
Websites .....	<a href="http://www.co.[county].mn.us">http://www.co.[county].mn.us</a>

### Minnesota Technical Assistance Program

Toll free .....	1-800-247-0015
Metro .....	612-624-1300
Website .....	<a href="http://www.mntap.umn.edu">http://www.mntap.umn.edu</a>

### Small Business Environmental Assistance

Toll free .....	1-800-657-3938
Metro .....	651-282-6143
Website .....	<a href="http://www.pca.state.mn.us/sbeap/">http://www.pca.state.mn.us/sbeap/</a>

### Minnesota Pollution Control Agency

Toll free (all offices) .....	1-800-657-3864
Brainerd .....	218-828-2492
Detroit Lakes .....	218-847-1519
Duluth .....	218-723-4660
Mankato .....	507-389-5977
Marshall .....	507-537-7146
Rochester .....	507-285-7343
St. Paul .....	651-296-6300
Willmar .....	320-214-3786
Website .....	<a href="http://www.pca.state.mn.us">http://www.pca.state.mn.us</a>

### Minnesota Duty Officer

Toll free .....	1-800-422-0798
Metro .....	651-649-5451
Website .....	<a href="https://dps.mn.gov/divisions/bca/Pages/default.aspx">https://dps.mn.gov/divisions/bca/Pages/default.aspx</a>