

Two-part Epoxies, Foams, Gelcoats, and Resins

Many businesses use epoxy, foam, gelcoat, resin, or other products that are supplied in two parts, often referred to as a resin and hardener, or a 'Part A' and 'Part B' component. Often, either one or both components of these two-part products are hazardous wastes in Minnesota when discarded. The Minnesota Pollution Control Agency (MPCA) and the metropolitan counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington (Metro Counties) regulate the treatment and management of excess and discarded two-part products.

Are my two-part products hazardous waste?

Many two-part product components are hazardous waste due to their ignitability or reactivity. You must assume that your two-part products are hazardous wastes when discarded unless you have evaluated each component as non-hazardous prior to mixing. For evaluation guidance, see MPCA fact sheet #w-hw1-01, Evaluate Wastes, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf>.

When is mixing two-part products regulated?

Mixing excess or unwanted two-part products for disposal is considered hazardous waste treatment regulated by the MPCA and Metro Counties. Usually, this mixing must take place in an open container to allow heat and gases produced during the curing process to be released.

Mixing two-part products for legitimate use to make a valuable new product or add value to an existing item is considered normal use and is not regulated under the Hazardous Waste Rules, but may be subject to employee safety standards administered by the Minnesota Occupational Safety & Health Administration (MNOSHA).

May I mix two-part products for disposal?

You may mix two-part products for disposal in an open container if you first obtain preapproval for this hazardous waste treatment from the MPCA or your Metro County. You only need to request approval before the first time you treat your waste; no further requests are required unless the wastes you are treating or your treatment method changes.

To request approval, submit this information to the MPCA or your Metro County. The MPCA does not have a standard form, however some Metro Counties may require a specific application - check with your regulator:

1. The manufacturer's mixture instructions, label information, Safety Data Sheets (SDS), and any other technical data documents for the two-part product you intend to mix for disposal.
2. Your intended treatment location, equipment, and exact method.
3. An explanation of how hazardous waste constituents will be prevented from being released to the land, water, and air during your treatment.

No preapproval is required if the entire treatment process will be performed in a fully closed container.

How must the treated waste be managed?

If you can document that you followed the product manufacturer's directions for mixing your two-part product, the MPCA and Metro Counties will allow you to assume that the reacted mass of waste is non-hazardous once it is fully cured. You may manage non-hazardous wastes in your normal solid waste stream.

For any other treatment, including mixtures not at the manufacturer's ratio, you must continue to manage the treated waste as hazardous unless you have evaluated it as non-hazardous. For evaluation guidance, see MPCA fact sheet #w-hw1-01, Evaluate Wastes, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf>.

How must two-part product containers be managed?

Many manufacturers and some distributors of two-part products allow return of emptied or partially emptied containers for refurbishing and refilling. Check the container marking or product literature for manufacturer return or contact information and check with your distributor. Two-part product containers returned and product remaining in them are not considered waste in Minnesota and are not subject to hazardous waste management requirements.

If you cannot return your two-part product containers to the manufacturer for reuse, you must manage them as hazardous waste unless you either evaluate the residue in them as non-hazardous, or can show that they meet the hazardous waste empty container standard. Meeting the empty container standard for containers from which the product is scooped or poured can be relatively easy, but for two-part products sold in pressurized cylinders, the standard can be extremely difficult or impractical to meet. See MPCA fact sheets:

#w-hw1-01	Evaluate Wastes	https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf
#w-hw4-16	Containers That Held Hazardous Wastes or Products	https://www.pca.state.mn.us/sites/default/files/w-hw4-16.pdf
#w-hw1-06	Treat or Dispose of Hazardous Waste	https://www.pca.state.mn.us/sites/default/files/w-hw1-06.pdf

Do I have to report waste two-part products treated on-site?

You must count the volume of the unmixed hazardous components before treatment towards your hazardous waste generator 'size' and report it to the MPCA or your Metro County.

Keep records for each batch of waste two-part products treated on-site, including the volume and that the preapproved treatment process was followed. Keep these records for at least three years after the last time you treated your waste on-site. For more information about hazardous waste recordkeeping, 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>.

More information

Guidance and requirements in this fact sheet were compiled from Minnesota Rules chapter 7045. Visit the Office of the Revisor of Statutes at <https://www.revisor.mn.gov/pubs> to review Minnesota Rules.

Contact your Metropolitan County or the MPCA with your questions. The MPCA's Small Business Environmental Assistance Program provides free, confidential regulatory compliance assistance. The Minnesota Technical Assistance Program (MnTAP) can help you reduce your waste and costs. Immediately report all hazardous waste spills and incidents to the Minnesota Duty Officer.

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/

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