

Commercial Hazardous Waste Factsheet

Small Quantity Generator management requirements

The following overview is an introduction to the hazardous waste rules which apply to small quantity hazardous waste generators. It is not intended to be an exhaustive summary of Minn. Rules Chapter 7045. You may use the following link to see the complete set of rules:

www.revisor.mn.gov/rules/?id=7045.

A Small Quantity Generator (SQG) produces more than 100 kilograms (220 pounds) but less than 1000 kilograms (2200 pounds) of hazardous waste per month. SQGs are subject to the same basic hazardous waste management requirements as Very Small and Large Quantity generators. In addition to the basic requirements, SQGs must designate emergency coordinators, post emergency equipment locations and emergency contact information near site telephones, notify local authorities of hazardous waste activities, provide employees with documented hazardous waste training, complete land disposal restrictions, certify waste minimization, and follow requirements for hazardous waste storage tanks. This information is intended to help familiarize businesses with the hazardous waste rules that are applicable and to assist in emergency preparedness.

Generator license application and renewal

(Minn. Rule 7045.0225-.0248)

A person who generates hazardous waste must obtain a separate hazardous waste generator license for each location where hazardous waste is generated. The hazardous waste [licensing forms](#) are designed to help new or unlicensed generators determine if their business must obtain a hazardous waste license. The forms also help businesses assess their existing hazardous waste management practices and help them become compliant with applicable hazardous waste regulations, well before they are ever visited for an inspection. The license must be renewed annually by submitting waste generation information through an online hazardous waste portal. The license must be posted in a public area at the licensed site.

Generator size

(Minn. Rule 7045.0206)

Generator size is determined by this rule. Wastes that are exempted from size category determination are identified (eg. used oil that is recycled). The additional requirements that apply when quantity limits are exceeded are also identified.

Identification number

(Minn. Rule 7045.0221)

A generator must obtain a site specific Hazardous Waste Identification Number (HWID) prior to the transportation, treatment, storage or disposal of any hazardous waste. The HWID application is an online process. The MPCA's Notification of Regulated Waste Activity e-Service must be used to apply for the HWID, update activities or other information under an existing HWID, or terminate a HWID. See the Minnesota Pollution Control Agency factsheet titled '[Obtain a Hazardous Waste Identification Number](#)' for instructions on how to set up an e-Service account and apply or update information.

Use and management of containers

(Minn. Rule 7045.0626)

Generators must ensure that their hazardous waste is stored in sturdy containers that are compatible with the waste being stored. Generators must also ensure that weekly inspections of hazardous waste storage containers and storage areas are conducted and documented.

Waste accumulation

(Minn. Rule 7045.0292 subp. 5)

A SQG may accumulate up to 3000 kilograms (6600 pounds) of hazardous waste on-site, provided that all hazardous waste is shipped off site within 180 days of the accumulation start date.

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If the facility is more than 200 miles from the generator site then, in some cases, the waste can be stored for an additional 90 days. This rule specifies accumulation requirements based on generator size and describes satellite accumulation, transportation time extensions, and accumulation requiring a permit. All generators are required to label hazardous waste storage containers and tanks with the words "Hazardous Waste", a description that clearly identifies the contents to employees and emergency response personnel, and a start date of accumulation. The rule also specifies the requirements for outdoor storage of hazardous waste.

Acute hazardous waste management

(Minn. Rule 7045.0292 subp. 7)

The P List identifies a specific group of acutely toxic discarded commercial chemical products, manufacturing chemical intermediates, and off-specification commercial chemical products that contain certain ingredients. These products or intermediates, and any soil or debris contaminated by spills of these products or intermediates, are P-listed hazardous wastes.

Acute hazardous wastes include all P-listed wastes and these six F-listed wastes: F020, F021, F022, F023, F026, and F027. Acute hazardous wastes are subject to more stringent generator accumulation requirements than other hazardous wastes. These requirements differ depending on the amount of acute hazardous waste generated and whether waste is stored under satellite accumulation or the full hazardous waste requirements. Health care clinics and pharmacies are exempt from several additional requirements when wastes are stored properly and inspected weekly. For detailed information on the more stringent requirements, see the Minnesota Pollution Control Agency factsheet titled '[P-List of Acute Hazardous Wastes & Managing Acute Hazardous Wastes](#)'.

Weekly inspection log

(Minn. Rules 7045.0292 subp. 5B, 7045.0626)

All generators are required to conduct and document weekly inspections of hazardous waste storage areas and storage containers. The [inspection log form](#) outlines some of the items which should be checked. Weekly inspection logs must be kept at the licensed site for at least three years from the date of inspection and must be available for review at the time of a compliance inspection.

To complete the inspection log: fill in the company name, HWID number and identify the person(s) responsible for conducting inspections. After each inspection, the inspector must fill in the date, indicate whether there were problems and initial or sign the form. If problems were noted, the corrective actions taken must be described on the back of the form.

Required emergency equipment

(Minn. Rule 7045.0292 subp. 5G, 7045.0566)

Hazardous waste generators must ensure that their facilities are maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release to air, land, or water of hazardous waste which could threaten human health or the environment. All generators are required to have equipment available to respond to emergencies involving their hazardous waste. They must have one item in each of the categories identified on the '[Required Emergency Equipment Checklist](#)'. The equipment should be checked periodically to ensure proper operation in the event of an emergency. In addition, there must be adequate aisle space for the unobstructed movement of personnel and emergency response equipment. If you desire an exemption for certain categories of equipment, you must explain the situation to this department. Exemptions do not preclude local fire marshals or other governmental bodies from requiring the equipment in question.

To complete the checklist: check off the equipment present at your site and write in the location on the form. Keep a copy of the completed form for your records.

Universal wastes

(Minn. Rule 7045.1400)

Universal Wastes (UW) are a special category of hazardous wastes that can be managed through a simplified process that minimizes paper work and encourages proper management. UW include lamps (fluorescent and high intensity discharge), batteries (dry cell, button, nickel cadmium, lead-acid, and lithium ion greater than 9 volts), pesticides, aerosols, and mercury-containing devices (thermostats, thermometers, barometers). UW regulations are optional. A generator may always opt to manage hazardous waste lamps, batteries, etc. as fully-regulated hazardous waste. However, for most generators, the UW rules are a more convenient way to safely manage these particular wastes.

Small Quantity Generator (cont.)

Hazardous waste management

(Minn. Rule 7045.0208)

Generators must ensure that their hazardous wastes are delivered to a permitted or otherwise authorized TSD (treatment, storage, disposal) facility or to a facility that under Minn. Rules pt. 7045.0125, will beneficially reuse or recycle the waste or treat the waste on-site in accordance with Minn. Rules pt. 7045.0211. The generator must not relinquish control of the waste if the generator has reason to believe the waste will not be properly managed.

Pre-transportation requirements

(Minn. Rule 7045.0270)

Prior to transporting or offering hazardous waste for transportation, a generator must mark and package their waste in accordance with Department of Transportation (DOT) regulations.

Manifests

SQGs are responsible for the preparation of a Uniform Hazardous Waste Manifest before shipping hazardous waste off-site for treatment, storage, or disposal. Legible copies of each manifest must be kept at the licensed site for at least three years and must be available for inspection.

EPA has now established a national system for tracking hazardous waste shipments electronically. This system, known as "e-Manifest," will modernize the nation's cradle-to-grave hazardous waste tracking process while saving valuable time, resources, and dollars for industry and states. EPA launched e-Manifest on June 30, 2018.

SQGs must also provide a Land Disposal Restriction notice to the designated facility with the first manifested shipment of each hazardous waste to that facility. The notice must state whether or not the waste meets land disposal restriction (LDR) treatment standards. These standards are found in the Code of Federal Regulations (CFR) at 40 CFR 268. The LDR is not required for additional future shipments of a waste unless the composition or characteristics of the waste stream change or the waste is shipped to a different facility. Copies of LDR documents must be kept at the licensed site and must be available for inspection.

When the generator/offerer signs a manifest on behalf of the SQG, they are also certifying that they have made a good faith effort to minimize their waste generation and have selected the best waste management method that is available to them and that they can afford.

Record keeping

(Minn. Rule 7045.0294)

This rule specifies record keeping requirements for manifests, very small quantity generator collection program receipts, license applications, exception reports, container inspection logs, and test results. All relevant records must be kept at the licensed site and must be available for inspection.

Duty to report

(Minn. Rule 7045.0275)

If the hazardous waste may cause pollution of the air, land resources, or waters of the state, spills, leaks, or other releases of hazardous waste must be immediately reported to the Minnesota Duty Officer by calling the 24-hour telephone number, 651-649-5451. Such releases must be rapidly and thoroughly recovered and appropriate steps must be taken to protect human health and the environment.

Emergency Coordinator

(Minn. Rule 7045.0292 subp. 5H (1))

All SQGs must ensure that at least one employee is responsible for coordinating emergency response measures at all times. The emergency coordinator must either be on the premises or available to respond to an emergency by reaching the premises in a short period of time. The Telephone Posting form lists the name and phone numbers for the emergency coordinator(s).

Telephone Posting

(Minn. Rule 7045.0292 subp. 5H (2))

The following information must be posted next to the telephone(s) which would likely be used in an emergency situation.

- Name and telephone number of the emergency coordinator(s)
- Location of fire extinguishers and spill control material
- Location of fire alarm, if present
- Telephone number of the fire department, unless there is a direct alarm.

To complete the [form](#): fill in the requested information and post the form next to any telephone(s) located in areas where hazardous waste is generated and/or stored.

Small Quantity Generator (cont.)

Personnel Training

(Minn. Rule 7045.0292 subp. 5H (3))

SQGs must ensure and document that all employees are familiar with proper hazardous waste management and emergency response procedures relevant to their responsibilities during normal facility operations and emergencies.

To complete the [form](#): fill in the information about the employee and the hazardous waste training received. Hazardous waste personnel records should be retained at the company site for present and former employees.

Local Authority Notification

(Minn. Rule 7045.0292 subp. 5G, 7045.0568)

All small quantity generators are required to notify their local police, fire, and hospital of their hazardous waste activities. The notification must include a list of the hazardous wastes produced, physical properties/health hazards associated with each waste, a site plan and/or description of facility entrance/evacuation routes, and the location of production areas.

To complete the [form](#): fill in the information requested about your company, list the hazardous wastes your company generates and the physical properties/health hazards, and include a site plan and/or a written description of your facilities layout. Make four copies of the notification and mail one copy to each of the following: police, fire, hospital and Hennepin County Department of Environment and Energy. Keep the original for your company records.

Requirements for SQG Tank Systems

(Minn. Rule 7045.0629)

These rule sections describe the requirements which apply to tank systems used to store or treat hazardous wastes.