

Commercial Hazardous Waste Factsheet

Minimal Generator management requirements

The Hennepin County hazardous waste management ordinance provides regulatory relief for a class of very small quantity hazardous waste generators that meet the minimal generator definition. This factsheet provides a summary of the minimal generator requirements.

If you are now classified as a minimal generator but you determine that you no longer meet that definition, please contact us at 612-348-3777 and ask to speak with the hazardous waste inspector-on-call.

Definition

A minimal generator is a business that generates only the following wastes:

- 100 pounds or less per year of hazardous waste such as solvent or paint thinner.
- Used oil (including transmission fluid, brake fluid, hydraulic fluid), used oil and fuel contaminated sorbents, used oil filters or petroleum fuel filters.
- Lead acid batteries.
- Special hazardous wastes including electronics and photographic film negatives.
- Universal wastes* including lamps, batteries, pesticides, aerosols and mercury-containing equipment such as thermostats, switches or thermometers.
- Photographic fixer solution (less than 220 pounds per month) and X-ray film that is shipped off site for recycling.
- Photographic fixer solution treated on site to remove hazardous constituents.
- Fuel/water mixtures not stored or accumulated on site.

* 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 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.

Licensing requirements

A minimal generator must:

Apply for a hazardous waste license. Licenses are non-transferable and are issued for a period of five years. *Minimal generators are exempt from license fees.*

Notify the department within 30 calendar days if the business closes, is sold or changes ownership, assumes a new name, moves to a new location, produces other hazardous waste not included in the current license, or generates more than 100 pounds per year of hazardous waste such as solvent or paint thinner.

Minimal generator status can be lost for:

- Failing to comply with Hennepin County's hazardous waste management requirements.
- Accumulating more than 55 gallons of hazardous waste such as solvent or paint thinner.
- Generating more than 100 pounds per year of hazardous waste such as solvent or paint thinner.

Container and storage requirements

All containers must be:

- In good condition.
- Compatible with the waste.
- Kept closed unless adding or removing wastes.
- Separated from incompatible hazardous materials.
- Inspected weekly with inspection results recorded in an inspection log (applies to fully regulated hazardous waste that is not stored in the immediate work area).



Minimal Generator management requirements (cont.)

Labeling requirements

- Hazardous waste storage containers must be labeled with the words “Hazardous Waste” and a clear description of the contents.
- Used oil storage containers must be labeled with the words “used oil.”
- Universal wastes must be labeled “Universal Waste” followed by a description of the waste. For example: “Universal Waste — lamps” or “Universal Waste — used lamps.”

Storage areas

- Liquid waste must be stored on an impermeable surface.
- Outdoor storage areas must have secondary containment.
- Containers of ignitable waste stored outdoors must be managed to prevent overheating and rupture.
- Storage areas must have restricted access.
- Storage areas must have adequate aisle space.

Spills and spill response equipment

- Immediately clean up spills of hazardous waste or hazardous material.
- Report spills to the State Duty Officer at 651-649-5451. Report information must include the location of the incident, type and amount of material, and the cleanup efforts that have been made.
- Ensure that the following emergency response equipment is available at the site: communication equipment, fire extinguishers, spill control equipment, decontamination equipment and adequate water supply.

Transportation

Comply with Department of Transportation (DOT) regulations when shipping hazardous waste.

Waste consolidation

A licensed generator may transport hazardous waste to another location approved by the county and owned by the generator for the purpose of consolidation.

Disposal options

Hazardous wastes must be disposed of in one of the following ways:

- Treat on site by a method approved by the MPCA or Hennepin County.
- Ship to a permitted hazardous waste facility.
- Ship to a Very Small Quantity Generator Collection Site.
- Ship used oil, used oil filters, oil-contaminated sorbents, spent lead acid batteries, “silver only” photographic fixer solution, universal wastes, and special hazardous wastes to a recycler or consolidation site.
- Sewer with approval of the local sewer authority.

Hennepin County maintains a list of hazardous waste disposal companies.

Visit: hennepin.us/hazwastedisposalcompanies

Record keeping

Disposal records, such as manifests, receipts, shipping papers and bills of lading must be kept on site for at least three years from the date of shipment and must be available for inspection at the licensed site.

Resources

- Hennepin County Environment and Energy, Commercial Hazardous Waste Unit:
hennepin.us/hwgenerators, 612-348-3777
- Minnesota Department of Transportation:
www.dot.state.mn.us, 651-296-3000
- Minnesota Pollution Control Agency:
www.pca.state.mn.us, 651-296-6300
- Minnesota Technical Assistance Program:
www.mntap.umn.edu, 612-624-1300