# Hazardous Waste Self Audit

## Section: Lethal Wastes

Tips, action steps and resources

### How do I know if a product or waste is lethal?

- Lethal products include pesticides, which are products or substances intended to prevent, destroy, repel or mitigate any pest, including bacteria, insects, mold, rodents and weeds (see SDS to confirm).
- Check product labels.

### Why can’t hazardous waste products be sent for reuse or credit?

Hazardous waste products that cannot be used for their intended purpose or sold must be shipped directly from your business site and disposed of through a permitted hazardous waste disposal company. It is illegal to send hazardous wastes to locations that are not permitted to receive hazardous wastes.

Brokers, charities, distribution centers, manufacturers and salvage companies generally are not permitted to accept hazardous wastes.

For more information

See the MPCA factsheet “Characteristic Wastes” at [www.pca.state.mn.us/publications/w-hw2-04.pdf](http://www.pca.state.mn.us/publications/w-hw2-04.pdf)

On Lethal Wastes, see the MPCA factsheet at [www.pca.state.mn.us/publications/w-hw2-05.pdf](http://www.pca.state.mn.us/publications/w-hw2-05.pdf)

## Refer to the tips, action steps and resources to help you complete the audit.

1. **Does your business generate any wastes that are classified as lethal?**
   - Yes. Fill out the Management Plan Form 2 — Lethal Wastes on page 2.
   - No, this business does not generate any lethal wastes.

2. **Do you return or send any products to the following for possible reuse or credit?** (check all that apply)
   - Broker (specify company) ________________________________
   - Charity/donation (specify company) _______________________
   - Distribution center (specify company) ______________________
   - Manufacturer (specify company) __________________________
   - Salvage company (specify company) ________________________
   - Other (specify) _______________________________________

   ➤ If a lethal product can be used for its intended purpose, it is **not** a waste and can be sent for reuse or credit.
   ➤ If a lethal product cannot be used for its intended purpose, it is a waste and needs to be managed as hazardous waste. It cannot be sent for reuse or credit.

3. **I understand that lethal products that meet the following descriptions are hazardous wastes and must be disposed of through a permitted hazardous waste disposal company.**
   - Products in a damaged container.
   - Products that may be contaminated or mixed.
   - Products that are unlabeled or unidentifiable.
   - Products with a broken seal.
   - Products that are expired.
   - Returned products that cannot be used for their intended purpose or cannot be sold.
   - Returned products that cannot be sold for liability reasons.

   - Yes, I understand that product waste must be properly disposed.

   ➤ If you may generate lethal hazardous wastes, fill out the Plan Form 2 — Lethal Wastes on page 2.

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Section: Lethal Wastes (continued)

Instructions for filling out the Management Plan Form 2

Management Plan Form 2 — Lethal and Toxic Wastes
Report how you manage or will manage your wastes. Call 612-348-3777 for assistance.

← Refer to the instructions for more information.

A. Waste name: Lethal and Toxic Wastes
B. Four-digit hazardous waste code: ☐ MN01 ☐ Other (if known, specify) ______

C. Year waste first generated: Estimate if unknown.

D. Shipment or treatment frequency: For example: 2 times per 1 year. Write “to be determined” if you are unsure how often the waste will be disposed.

G. Type of waste storage container: Storage containers must be:
   • Compatible with the waste (will not react with, be affected by, or absorb contents)
   • Sturdy and leak-proof (will not leak when overturned or bumped)

I. Amount generated per year: If you don’t have a history of the amount of waste generated, estimate the amount that will be generated in a year.

J. I understand and follow the requirements for proper labeling and storage:
   • Labeled with the words “Hazardous Waste”
   • Labeled with a clear description of the waste (e.g., Waste Pesticides, Toxics, Lethals)
   • Labeled with the accumulation start date
   • Container is closed

K. Disposal facility management method (contact your disposal company if unknown)
   • Recycle
   • Burn as fuel
   • Incinerate
   • Have not yet identified a disposal company
   • Other _______________

L. Transporter name*: __________________________
   or ☐ Self ☐ To be determined*

M. Transporter EPA ID number: __________________________

N. Disposer name*: __________________________
   or ☐ To be determined*

O. Disposer EPA ID number: __________________________