



Section: Evaluating your wastes

Self-Audit Tips, Action Steps & Resources

A hazardous waste is a waste that contains properties that make it potentially harmful or dangerous to the environment or human health. As a business owner, you are required by law to evaluate *all* of the wastes you generate to determine if they are hazardous (*Minnesota Rule 7045.0214*). Also evaluate any potential wastes you may generate in the future. You must document the results of your evaluations.

Some businesses choose to assume their wastes are hazardous wastes because they know their waste is hazardous or they don't want to pay to evaluate their wastes (often because they only generate a small amount of waste). If you decide to assume your waste is hazardous, you must manage it as hazardous waste (*Minnesota Rule 7045.0214, subpart 1*).

Instructions for using the evaluation section

This section provides information on the steps you must take to evaluate your wastes. Follow each step of the evaluation checklist to evaluate your waste. Also refer to the flow chart on page 3 that illustrates the evaluation process. Each step identified in the flow chart corresponds to a step in the evaluation check list.

Waste evaluation checklist

These are the steps you need to take when evaluating your wastes to determine if they are hazardous wastes. See the MPCA factsheet: Step 1. Evaluate Waste; Determine Generator Size (www.pca.state.mn.us/publications/w-hw1-01.pdf) for more information on the evaluation process.

- 1. Make a list of all of the wastes and any potential wastes you generate.**
 - Include materials that are discarded, recycled or sewered.
 - Include products that are contaminated, damaged, expired, unlabeled or unusable, even if they have never been used.
 - Consider wastes from all areas of your business: maintenance, transportation, production, sales, etc.
- 2. Check your list to determine if any of the wastes or potential wastes are exempt from hazardous waste regulations. Exempt wastes include but are not limited to:**
 - Food handling and preparation waste
 - Farm waste or vegetative waste
 - Recycled scrap metal

2. Exempt wastes:

See *Minnesota Rule 7045.0120* for the complete list of exempt wastes:
www.revisor.leg.state.mn.us/rules/?id=7045.

3. Universal wastes:

See the MPCA factsheet: *Managing Universal Wastes* at www.pca.state.mn.us/publications/w-hw4-62.pdf.

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4. Special wastes:

See Hennepin County Ordinance #07 Hazardous Waste Management: www.hennepin.us/hwgenerators.

5. Listed wastes:

Use Material Safety Data Sheets, product labels, and product documentation to identify which chemicals and materials are in your wastes. Please note that these sources of information may not list all of the ingredients in a product, so although these sources are a good step, more documentation and/or testing may be needed to determine if a product waste is hazardous.

6. Hazardous waste characteristics:

See the MPCA factsheet: *Characteristic Hazardous Wastes* at www.pca.state.mn.us/publications/w-hw2-04.pdf.

7. Minnesota Lethality:

See the MPCA factsheet *The Lethality Characteristic* at www.pca.state.mn.us/publications/w-hw2-05.pdf.

3. **Check your list to see if any of the wastes are a Universal Hazardous Waste. Universal wastes include but are not limited to:**
 - Batteries
 - Fluorescent Lamps
 - Mercury-containing equipment
 - Dental amalgam
 - Pretreated dental wastewater

4. **Check to see if any of the wastes are a Special Hazardous Waste. Special Hazardous Wastes include:**
 - Photographic film and X-ray negatives
 - Electronics

5. **Check to see if any of your wastes or potential wastes are listed hazardous waste:**
 - F Listed Waste
See www.pca.state.mn.us/publications/w-hw2-00.pdf
 - K Listed Waste – Industry specific wastes
See www.pca.state.mn.us/publications/w-hw2-01.pdf
 - U Listed Waste: – Chemical related wastes
See www.pca.state.mn.us/publications/w-hw2-03.pdf
 - P Listed Waste – Acute hazardous wastes
See www.pca.state.mn.us/publications/w-hw2-02.pdf
 - ➔ Any wastes that are mixed with or derived from listed components are also considered listed and are hazardous. For example, spraying parts over a parts washer with a listed solvent would make waste parts washing solvent a listed hazardous waste.

6. **Determine if any of your wastes or potential wastes display any hazardous waste characteristics:**
 - Ignitable
 - Oxidizer
 - Corrosive
 - Reactive
 - Toxic

7. **Check to see if any of your wastes or potential wastes are considered a hazardous waste under the Minnesota Lethality Characteristic.**
 - Minnesota Lethality Characteristic

8. **Document all evaluations of your waste and potential wastes.**
 - Keep documentation and any reference materials used for evaluation at the site of generation.

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Evaluation flow chart

The flow chart illustrates the evaluation process. Each step identified in the flow chart corresponds to a step in the evaluation check list on pages 1 and 2.

