

Hazardous Waste Generator License and Waste Identification Number

Background

To track management of regulated waste, companies responsible for generating waste must obtain a Waste Identification Number (Waste ID #, formerly known as an EPA ID #) and use this number on all hazardous waste manifests or Very Small Quantity Generator (VSQG) Program documents. A Waste ID # is obtained by completing a [Notification of Regulated Waste Activity Form](#).

Once a hazardous waste generator license has been issued for a facility, the generator must pay a license fee and an annual tax to the Minnesota Pollution Control Agency. Tax payments replenish the superfund cleanup program, which is used to support cleanup of superfund sites that do not have a viable responsible party.

A Waste ID# is site specific and is effective as long as the facility address does not change. A new Waste ID # must be applied for if the facility address changes. When applying for a new Waste ID #, a letter must be submitted to the MPCA notifying that the former Waste ID # should be inactivated.

Hazardous Waste Produced at Remote Locations

Depending primarily on the amount of waste, an existing Mn/DOT facility Waste ID # can be used for regulated waste generated or taken ownership of at a remote location or a temporary Waste ID # can be obtained. Remote locations include construction project sites, wastes abandoned in buildings acquired by Mn/DOT, on highway right of way, or at other Mn/DOT properties such as storage yards.

It is generally not cost effective to obtain a Waste ID # for small amounts of hazardous waste, such as a couple of gallons generated at a construction site or left in a Mn/DOT-owned building by a previous owner. In these cases, an existing Mn/DOT District Headquarters Waste ID # may be used to track management of the waste. However, larger volumes of waste assigned to an existing Mn/DOT Waste ID # may result in increasing the hazardous waste generator status of the facility, requiring compliance with more restrictive regulations. Generator status must be considered when determining whether to obtain a temporary Waste ID # or to use an existing one.

Process for Managing Hazardous Waste at Remote Locations

- The Office of Environmental Services must be notified by the Mn/DOT Construction Engineer or the District Waste Management Coordinator (WMC) if hazardous material has been abandoned or generated at a remote location.
- The District WMC shall determine whether to use a current Waste ID # or to apply for a temporary Waste ID # for the project.

Mn/DOT Regulated Materials Management

If a temporary Waste ID # is needed for the project, the District WMC will assist construction staff with the following:

- Obtaining a Minnesota Hazardous Waste Generator License and Waste ID #.
- Proper contract to use (link to state hazardous waste contractor for transport and disposal).
- Closing out the temporary Waste ID # once the hazardous waste disposal needs for the project have been completed.

If an existing Waste ID # will be used for the project, the District WMC shall:

- Determine the appropriate Mn/DOT Headquarters or other appropriate Mn/DOT facility Waste ID # to use for the project. Metro District has assigned a Waste ID # to the Water's Edge facility to use for remote projects. The WMC shall ensure that the quantity of hazardous waste assigned to the existing Waste ID # will not affect the generator status (see information below on *Hazardous Waste Generator Size*).
 - Ensure that the existing Waste ID # will be used by the licensed hazardous waste contractor transporting the waste from the remote location and that the same Waste ID # is used when completing the annual hazardous waste generator license disclosure.
 - Determine if it is acceptable for Mn/DOT personnel to transport small quantities of hazardous waste in a Mn/DOT vehicle to a Mn/DOT facility with a Waste ID#.
- All documentation shall be maintained in the appropriate file. The District WMC must retain copies of all hazardous waste manifests and/or shipping documents for MPCA annual reporting.

Hazardous Waste Generator Size

- **Minimal Quantity Generator** – maximum of 10 gallons or 100 lbs of hazardous waste generated per year.
- **Very Small Quantity Generator** - maximum of 220 gallons or 2,200 lbs of hazardous waste generated per year.
- **Small Quantity Generator** - maximum of 660 gallons or 6,600 lbs of hazardous waste generated per year.