

Obtain a Hazardous Waste Identification Number

Step 3 in the [10 Steps to Hazardous Waste Compliance series](#)

What is a Hazardous Waste Identification Number?

A *Hazardous Waste Identification Number* (HWID) is a unique number used to simultaneously identify both a physical site at which hazardous waste is handled and the operator of that site. The Minnesota Pollution Control Agency (MPCA) assigns HWIDs in Minnesota. Because the U.S. Environmental Protection Agency (EPA) coordinates this numbering system nationwide, HWIDs are also referred to as *EPA ID#s*.

Which sites require HWIDs and which sites do not?

HWIDs are issued to sites, not to businesses. In Minnesota, businesses and government agencies must obtain a HWID for each site where hazardous waste is generated, transported, stored, or treated. There are exceptions for certain types of exempt waste, contiguous sites, and cogenerators, which are discussed below:

Require an HWID or multiple HWIDs	Exempt from an HWID or additional HWIDs
Hazardous waste generation Sites generating hazardous waste that is reportable to the MPCA or Metropolitan Counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, or Washington (Metro Counties). Sites generating hazardous wastes that are reportable but not counted towards a site's generator size, such as feedstocks, byproducts, and pharmaceuticals, must still obtain an HWID.	Sites generating only hazardous waste not reportable to the MPCA or Metro County, such as universal waste, used oil, and electronics.
Co-located businesses Separate businesses co-located at the same site but that will manage their hazardous waste separately. Each business requires its own HWID.	Separate businesses that are co-located and engaged in a common operation that have agreed to manage their hazardous waste together. Only one HWID is needed for the site. See What are cogenerators? on page 2.
Temporary job sites Hazardous waste generated by a contractor will be shipped for disposal directly from the job site. Either the site operator or contractor may obtain an HWID for the site. See What are cogenerators? on page 2.	A contractor will transport hazardous waste they generate back to their shop. The shop must have an HWID. See MPCA fact sheet #w-hw3-11, Construction and service contractors, at https://www.pca.state.mn.us/sites/default/files/w-hw3-11.pdf .
Contiguous vs. non-contiguous properties Sites on non-contiguous properties. See What makes property contiguous? on page 2.	Additional sites of the same generator on a contiguous property, even if buildings are not connected. See What makes property contiguous? section on page 2.
Household pharmaceutical collection receptacles Household pharmaceutical collection receptacles hosted at a long-term care facility. See MPCA fact sheet #w-hhw2-07, Collecting Pharmaceuticals from Households and LTCFs, at: https://www.pca.state.mn.us/sites/default/files/w-hhw2-07.pdf	Pharmacies operating a household pharmaceutical collection receptacle at their own location.
Properties with multiple addresses	A site has an HWID assigned, but hazardous waste is shipped from a portion of the site with a different street address. Explain in Section 14 of the hazardous waste manifest. See MPCA fact sheet #w-hw1-07, Manifest shipments of hazardous waste, at: https://www.pca.state.mn.us/sites/default/files/w-hw1-07.pdf

What makes property contiguous?

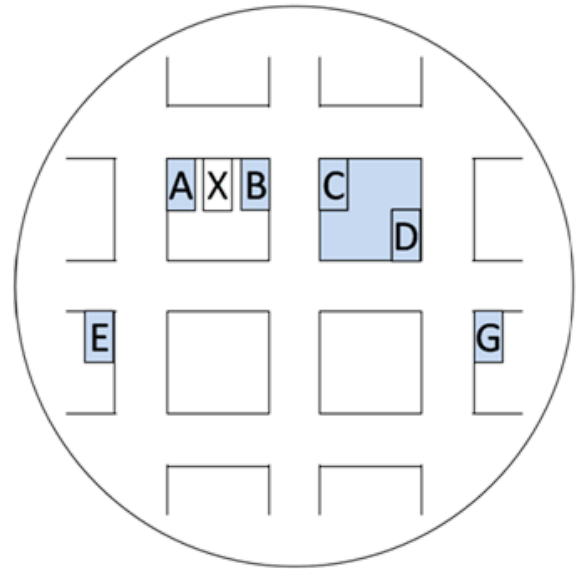
A property is *contiguous* and all sites on it may operate under a single HWID if all the property is both:

- Owned or controlled by the hazardous waste operator.
- Immediately adjacent or accessible by only crossing public rights-of-way, such as streets or rivers.

Some common HWID scenarios are illustrated below. Shaded areas represent property owned or controlled by one business. Separations are public rights-of-way. White areas represent property owned by other businesses. The lettered areas represent sites where hazardous waste is handled (the letter 'F' is omitted for visual clarity).

Contiguous and non-contiguous property

- A and B are non-contiguous because they are separated by another party's property. Each would require a separate HWID.
- B and C are contiguous because they are accessible by only crossing the public right of way. They may be operated under a single HWID.
- C and D are contiguous because they are located on a single property, even though the buildings are not connected. They may be operated under a single HWID.
- D and G are contiguous because they are accessible by only diagonally crossing the intersection of two public right of ways. They may be operated under a single HWID.
- A and E are non-contiguous because waste would be required to travel along a public right of way which does not border the generator's sites. Each would require a separate HWID.



If a generator with multiple sites on a contiguous property (such as different buildings on a corporate or academic campus) wishes to manage hazardous waste at some of those sites separately, multiple HWIDs may be requested and issued, however multiple HWIDs may not be used to lower the generator's regulated status or avoid regulatory requirements otherwise applicable to the entire property.

What are cogenerators?

At some sites, two or more businesses may jointly generate hazardous waste. Both businesses are considered *cogenerators* of the waste, and are equally liable for its management and all applicable hazardous waste requirements. Cogeneration can occur:

- Intentionally, such as when one business owns and manages a factory that generates a hazardous waste, but the equipment inside is operated by employees of another business. Contractors working at temporary job sites are also cogenerators with the operator of the job site.
- Accidentally, such as if a shipment of material owned by a business is damaged in transit by a different transporting business and requires disposal as a hazardous waste.

Only one HWID is needed for each site of cogeneration. Though both cogenerators are responsible for ensuring an HWID is obtained, the MPCA encourages cogenerators to identify one primary party for waste duties and to document this selection. Remember that both the site business and contractor remain cogenerators and equally liable for all hazardous waste management regardless of whose name the HWID is under.

How do I obtain an HWID?

To obtain an HWID for sites anywhere in Minnesota, use the MPCA's online e-Services Notification of Regulated Waste Activity tool. See the instructions in MPCA fact sheet #w-hw5-12, Notification of Regulated Waste Activity, at: <https://www.pca.state.mn.us/sites/default/files/w-hw5-12.pdf>.

There is no fee to obtain an HWID. Obtaining an HWID will not make you liable for any additional regulation.

If you cannot use the MPCA's online tool, you may contact the MPCA to request a paper form be mailed to you.

Do not use U. S. Environmental Protection Agency (EPA) form 8700-12 or the EPA's online myRCRAid tool.

See [More Information](#) on page 4.

In an emergency situation, contact the MPCA to request an expedited HWID issuance.

Can I use the HWID of the site I bought or moved to?

HWIDs simultaneously identify both a physical site where hazardous waste is handled and the operator of that site. Therefore, when the operator of a site changes, the HWID also must be changed or reissued. Continuing to use the HWID of a former site operator without the MPCA reissuing it is prohibited and may expose you to liability for actions of the former operator.

If you purchase a business or move into a site, do not use the HWID assigned to the prior business or operator of the site unless the HWID is reissued to you by the MPCA. Request a new HWID from the MPCA.

See [How do I obtain an HWID?](#) above on this page.

What if I sell, close, or move my business?

When your business is sold, closes, or moves to another site, submit an inactivation notification for the original site to the MPCA using the [e-Services Notification of Regulated Waste Activity](#) tool.

HWIDs are site-specific and cannot be transferred to a new site. Obtain a new HWID for a new site, even if your business is the same. See [How do I obtain an HWID?](#) above on this page.

How can I check an HWID?

You may check the HWID for any site in Minnesota using the MPCA's What's In My Neighborhood text search or mapping tools at: <https://www.pca.state.mn.us/data/whats-my-neighborhood>.

You may also check the HWID for any site nationwide using the EPA's Enforcement and Compliance History Online (ECHO) tool available through the EPA's website at: <https://echo.epa.gov/>.

Note: Information obtained from the EPA for sites in Minnesota may lag changes submitted to the MPCA by several weeks.

You may also contact the MPCA to inquire about the HWID for a particular site. See [More Information](#) on page 4.

More information

Guidance and requirements in this fact sheet were compiled from Minnesota Rules, Chapter 7045. Visit the Office of the Revisor of Statutes at <https://www.revisor.mn.gov/pubs> to review Minnesota Rules.

Minnesota's hazardous waste requirements are explained in other factsheets like this one, available at no charge on the MPCA's Hazardous Waste Publications webpage at <https://www.pca.state.mn.us/waste/hazardous-waste-documents-and-forms>.

Contact your Metropolitan County or the MPCA with your questions. The MPCA's Small Business Environmental Assistance Program can also provide free, confidential regulatory compliance assistance. The Minnesota Technical Assistance Program can help you reduce your hazardous waste generation and possibly the need to obtain an HWID.

Metro County Hazardous Waste Offices

Anoka	763-324-4260
.....	https://www.anokacounty.us/
Carver	952-361-1800
.....	http://www.co.carver.mn.us/
Dakota	952-891-7557
.....	https://www.co.dakota.mn.us/
Hennepin	612-348-3777
.....	http://www.hennepin.us/
Ramsey	651-266-1199
.....	https://www.ramseycounty.us/
Scott	952-496-8177
.....	http://www.scottcountymn.gov/
Washington	651-430-6655
.....	https://www.co.washington.mn.us/

Minnesota Pollution Control Agency

Toll free (all offices)	1-800-657-3864
All offices.....	651-296-6300
.....	https://www.pca.state.mn.us/

Small Business Environmental Assistance

Toll free	1-800-657-3938
Metro	651-282-6143
.....	https://www.pca.state.mn.us/sbeap/

Minnesota Technical Assistance Program

Toll free	1-800-247-0015
Metro	612-624-1300
.....	http://www.mntap.umn.edu