

**Mn/DOT
Very Small Quantity Generator (VSQG)
Consolidation Program Permit**

All of Mn/DOT is currently in the VSQG consolidation program with the exception of the Metro District. This VSQG consolidation program permit allows non-metro Mn/DOT truck stations to transport hazardous to their respective Mn/DOT district headquarters. Hazardous waste may not be transported across district boundaries. The Metro District presently cannot consolidate or transport hazardous waste under this program.

Transport of hazardous waste from the Mn/DOT headquarters to a Mn/DOT approved waste disposal or recycling facility must be conducted by a Mn/DOT approved, licensed hazardous waste hauler. Consult the current list of Mn/DOT [approved endsites](#) to determine the appropriate disposal or recycling facility.

This program enables the department to efficiently manage hazardous waste and reduces the transportation cost to dispose or recycle waste materials. It is critical that Mn/DOT follow the process described below. Deviations from the process may result in violation of hazardous waste regulations and the Minnesota Pollution Control Agency revoking the department's permit to consolidate waste for transport.

Hazardous and problem wastes may be transported from Mn/DOT truck stations in the VSQG Consolidation Permit Program to the Mn/DOT headquarter consolidation site within the same district in accordance with the following process:

General Requirements

1. Each district headquarters facility and truck station must retain an [EPA generator identification number](#).
2. Only Mn/DOT vehicles shall be used to transport waste collected from truck station hazardous waste activities to the headquarter consolidation site in the same district. Waste from other Mn/DOT districts, residences private businesses other governmental agencies or citizens will not be accepted.
3. Under this program, the Minnesota Pollution Control Agency does not allow transportation of the following hazardous waste without prior written permission: explosives, poisons, inhalation hazard materials, unknowns and solids or liquids that are reactive with water.

Consolidation Site Requirements

The VSQG consolidation site is responsible for all aspects of the program and must operate the program in accordance with standards applicable to a large quantity generator of hazardous waste. This requires adherence with the following:

1. Must have a VSQG Consolidation Permit from the Minnesota Pollution Control Agency.
2. Appropriate Mn/DOT personnel must be properly trained and an emergency contingency plan must be prepared for the consolidation site. Training should include knowledge of the following:

Mn/DOT Regulated Materials Management

- use of shipping papers with the proper DOT shipping name
- marking and labeling waste containers
- transportation requirements of waste
- proper selection of storage and shipping containers
- emergency response procedures.

The Office of Environmental Services [Waste Management Team](#) will assist with any training needs upon request.

3. Store waste in accordance with item C, page 4 and 5 of the Mn/DOT [VSQG Consolidation Program Master Application](#). This document contains waste management and storage requirements specific to Mn/DOT districts.

Recordkeeping Requirements

The program operator must keep a written operating log at the consolidation site. This operating log must be retained for a minimum of three years. After three years, the records can be shipped to OES [provide link] for permanent storage. Minimum information required in the operating log includes the following:

1. Name of truck station, address and EPA ID number shipped from.
2. Name and quantity of each hazardous waste and problem waste consolidated.
3. Date the waste was received at the district headquarters consolidation site.
4. Date the waste was shipped from the consolidation site to the [endsite](#).

The consolidation site operator at the district headquarters must provide the truck station a [VSQG consolidation shipping paper](#) for shipment of the waste. This shipping paper must be retained for a minimum of three years. After three years, the records can be shipped to [OES](#) for permanent storage. The shipping paper must include the following:

1. Name, address, and EPA ID number of the truck station shipped from.
2. Name and quantity of each hazardous waste and problem waste received.
3. Date the waste was received at the district headquarter consolidation site.
4. Signatures of the generator and consolidation site personnel.

For both the district headquarter consolidation site and truck station, retaining a copy of a completed shipping paper consisting of the above information is adequate under this program.

Transportation

1. Under this program, Mn/DOT may transport their own waste using Mn/DOT personnel and Mn/DOT vehicles to a licensed VSQG consolidation site within the same district where the waste was generated. A licensed hazardous waste transporter is not required to bring the waste from the truck stations to the district headquarter consolidation site. However, a licensed hazardous transporter must be used to deliver the waste from the district headquarter consolidation site to the endsite.

Mn/DOT Regulated Materials Management

2. A Mn/DOT VSQG Consolidation [shipping paper](#) must be used.
3. Transport of the waste must be in accordance with DOT guidelines. See the backside of the [shipping paper](#) for proper DOT vehicle and container labeling descriptions of hazardous waste.