

# Frequently Asked Questions - Hazardous Waste Program

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This is a compilation of the most frequent questions and their corresponding answers, designed to provide easy access to information about specific topics on the Provincial Hazardous Waste Program.

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## General

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### 1. What is hazardous waste?

Hazardous waste is waste that can be harmful to human health or the environment due to its chemical, physical, or biological properties. These wastes include a broad range of materials such as waste solvents, waste paint, waste lead acid batteries, waste pesticides, used motor oil, and biomedical waste. With certain exceptions, hazardous waste may be described in general as “waste dangerous goods”.

To reduce adverse effects to human health and the environment, it is essential that hazardous waste is handled, stored, transported, treated and disposed of properly. Section 2 of the Hazardous Waste Regulation specifies the criteria for hazardous waste identification in Manitoba.

### 2. Where can I find information about Manitoba’s Hazardous Waste Program and Hazardous Waste Legislation?

Hazardous Waste Program Website is the primary source of information about the program, including regulations, procedures, and resources. You can find information on the Manitoba government website under "Environment and Climate Change" and "Waste Management". It can be accessed by following this link: [Environment and Climate Change | Province of Manitoba](https://www.gov.mb.ca/env/faq.html)

### 3. What if the waste I generate does not meet the hazardous waste criteria in Manitoba, but cannot be disposed of via the sewer or landfill because the contaminant exceeds limits in other legislation such as a municipal by-law or exceeds the limits in the licence for a disposal facility or is restricted by other disposal requirements?

This is a common occurrence as requirements become more stringent on waste disposal practices in order to protect municipal infrastructure and prevent contamination of sensitive environmental receptors, such as ground and surface waters. In this case, the only available option (even though the waste might not be regulated as hazardous waste in terms of Manitoba's hazardous waste criteria) may be to arrange for the disposal of the waste by a hazardous waste management company that has an avenue for proper disposal.

## Treated Wood Waste

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### 4. Are waste wood products that have been treated with wood preservative hazardous waste?

Waste wood products are not to be considered as hazardous waste if they have been treated with a wood preservative or wood protection product registered under the Pest Control Products Act (Canada). This is specified in sub section 2 (2) (c) of the Hazardous Waste Regulation.

However, other provincial and / or federal environmental legislation may apply in instances where site contamination, odour problems, drinking water concerns or effects on fish bearing waterways are of concern.

## Petroleum Hydrocarbon Contaminated Soil

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### 5. Is petroleum hydrocarbon contaminated soil a hazardous waste in Manitoba?

Petroleum hydrocarbon contaminated soil is not always designated as hazardous waste. It depends on the concentration of contaminants and how it's being handled.

Petroleum hydrocarbon contaminated soil is not a hazardous waste if it meets the requirements specified in sub section 2(2) (d) and (e) of the Hazardous Waste Regulation (regulation).

As such, the regulation excludes petroleum hydrocarbon contaminated soil from the definition of hazardous waste under the following circumstances:

- (a) if soil exceeding the concentration limit in Schedule C (of the regulation) for benzene, toluene, ethylbenzene or xylene, as long as the soil **does not** also contain another product, substance or organism that is designated as hazardous waste, **and** is to be treated in a licensed soil treatment facility or another facility approved by the director; or
- (b) if soil exceeding the concentration limit for polycyclic aromatic hydrocarbons [total concentration greater than 100 ppm measured as PAH TEQ (toxicity equivalent) by weight], as long as the soil **does not** also contain another product, substance or organism that is designated as hazardous waste, **and** is to be treated in a licensed soil treatment facility or another facility approved by the director.

## Biomedical Waste Sharps

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### 6. Are biomedical waste sharps regulated as hazardous waste under the Hazardous Waste Regulation?

Waste sharps including needles, syringes, blades, and lancets are considered hazardous wastes and are regulated under Class 6.2 Infectious Substances if they are known or believed to contain infectious substances.

The generator is responsible for identifying the hazardous wastes. In the case of infectious substances, this decision can be made by the generator in consultation with medical doctor, veterinarian, pathologist, nurse, coroner, or laboratory technologist.

Information bulletin on “Characterization of Infectious Waste” outlines the process of identifying and classifying infectious waste: [chracterization-infectious-waste.pdf](#)

## Hazardous Waste Generator Registration

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### 7. At what point is a company required to register as a hazardous waste generator?

In accordance with the Hazardous Waste Regulation (regulation), a generator of hazardous waste must register and receive a registration number when:

1. the quantity of hazardous waste generated in a month is equal to or greater than the Registerable Quantity specified in Schedule F of the Regulation; or
2. hazardous waste in quantities greater than 5 L or 5 kg (or 500 g of PCB mixture) is to be removed from the premises where it was generated; or
3. hazardous waste in quantities equal to or greater than the amount specified in Schedule G of the Regulation is to be removed from the premises where it was generated; or
4. store or provide storage facilities for hazardous waste generated by another person.

The prescribed quantity of a hazardous waste that must be registered is usually called the registerable quantity. This quantity varies according to the hazard of the waste. Registration quantities are listed in [Schedule F – Amount of Hazardous Waste Requiring Registration of the Regulation](#).

### 8. How do I register a hazardous waste and obtain a Generator Registration Number (MBG No.)?

You must register as a hazardous waste generator by submitting an online [Hazardous Waste Generator Registration e-Form](#) to Manitoba Environment and Climate Change. Once the registration is approved, a hazardous waste generator registration number (Provincial Generator Registration ID.) will be issued to the generating company.

### 9. Is there an application fee to apply for a generator registration number?

There is no fee to register hazardous waste.

### 10. Do I have to register for a one-time generation of hazardous waste?

Yes, registration is required for one-time generation of a regulated quantity of hazardous waste.

**11. If our company moves to a new location, can we continue to use the registration number that was issued for our former location?**

No. Manitoba hazardous waste generator registration numbers are identified with the waste generation site location. Therefore, if you move your operation, you must submit a new registration form for your new location. At the same time, notify the department that you are no longer at your old location and ask that the generator registration No. (Provincial Generator Registration ID.) for your old location be inactivated.

**12. Can a company use the same generator number if it generates and ships hazardous waste from more than one location in Manitoba?**

As described in the answer to question no. 11 above, a separate generator number is required for each location; hence, a hazardous waste registration form must be completed for each location.

**13. Is there a requirement to renew the hazardous waste generator registration on a regular frequency such as annually?**

There is no such requirement. However, if there are changes to the information provided in the past, in accordance with sub sections 4(5) and 4(6) of the Hazardous Waste Regulation, the registrant must file an amended registration form. Amendments to registration can be submitted using the [Hazardous Waste Generator Registration e-Form](#).

**14. Who should I contact to find out if my company has a Manitoba hazardous waste generator registration number?**

You may review the [Generator Registration Quarterly Report](#) found on the Hazardous Waste Program Website or contact the Provincial Hazardous Waste Program at [HazWasteRegistration@gov.mb.ca](mailto:HazWasteRegistration@gov.mb.ca) or respective [Regional Offices](#) of the Environmental Compliance and Enforcement Branch.

**15. Does Manitoba Environment and Climate Change issue generator numbers to out-of-province companies that send hazardous waste to facilities in Manitoba?**

Manitoba does not issue Hazardous Waste Generator Registration Numbers to operations located out-of-province. Manitoba accepts out-of-province generator numbers for hazardous waste shipments to Manitoba. Out-of-province generators must obtain a generator number from the appropriate authority in their own Province/Territory.

**16. Are hazardous waste storage requirements applicable to my operation?**

Hazardous waste generators must comply with hazardous waste storage requirements specified in the Hazardous Waste Regulation. However, these requirements do not apply

- (a) to the operator of a licensed hazardous waste disposal facility;
- (b) to the storage of PCB waste; or
- (c) to the storage of petroleum or allied petroleum products under the Storage and Handling of Petroleum Products and Allied Products Regulation, M.R. 188/2001.

## Hazardous Waste Transport

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### **17. What do I need to do to legally transport hazardous waste in Manitoba?**

To legally transport hazardous waste in Manitoba, you must apply for a Licence to Transport Hazardous Waste with Manitoba Environment and Climate Change. When the department approves your application, you will be issued a Licence to Transport Hazardous Waste.

### **18. What amount of hazardous waste is a regulated amount during transport?**

The regulated amount is 5kg of solid hazardous waste or 5L of liquid hazardous waste or liquid or solid hazardous waste that contains 500 g of PCB mixture. Additionally, hazardous wastes listed in Schedule G of the Hazardous Waste Regulation are regulated when in applicable quantities set out in Column 2 of that schedule.

### **19. How do I apply for a Manitoba Carrier Licence (MBC No.) for hazardous waste?**

You must apply for a Licence to Transport Hazardous Waste to Manitoba Environment and Climate Change in accordance with requirements in the Hazardous Waste Regulation. There is no fee for the hazardous waste transport licence, but specific supporting information and documents must accompany the application form.

The application form and instructions to apply for a [Licence to Transport Hazardous Waste](#) can be downloaded from the “Forms” section of the [Hazardous Waste Program webpage](#). When the licence is issued, a carrier licence number (Provincial Carrier Registration ID.) will be provided to the licensee.

### **20. Application for a Licence to Transport Hazardous Waste requires proof that every employee of the company who will be handling or transporting hazardous waste has received the Transportation of Dangerous Goods Training. Where can I get more details of this training? Where can I have my employees trained?**

A Transportation of Dangerous Goods (TDG) training certificate is required for anyone involved in the transportation of hazardous waste to ensure that they are adequately trained to identify hazards, understand proper handling procedures, respond to emergencies and can fulfill their duties in compliance with Federal Transportation of Dangerous Goods Regulations (TDGR) as well as Hazardous Waste Regulation. This training is crucial for public safety, preventing accidents, injuries, and environmental harm.

Transport Canada’s [TDG Bulletin on TDG Training](#) explains the training requirements outlined in the TDGR. For a list of organizations that offer TDG training, please visit: <http://wwwapps.tc.gc.ca/saf-sec-sur/3/train-form/search-eng.aspx>.

### **21. Does Manitoba Environment and Climate Change issue hazardous waste Carrier Registration Numbers to out-of-province companies that transport hazardous waste through Manitoba between other jurisdictions?**

The Dangerous Goods Handling and Transportation Act recognizes hazardous waste transport licences issued by other provinces. Hence, a Manitoba carrier registration number is not required if an out-of-province carrier is only transporting hazardous waste through Manitoba between other jurisdictions; in that case the carrier number, which is issued by the province/territory wherein the carrier is based, is accepted in Manitoba.

## Hazardous Waste Receivers

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### 22. How to obtain a Licence under The Dangerous Goods Handling and Transportation Act?

Any collection facility that receives hazardous waste from off-site must be licensed or approved in accordance with The Dangerous Goods Handling and Transportation Act. A hazardous waste disposal facility is defined by the act as a facility operated for the treatment, disposal, or bulk storage of hazardous waste. To obtain a licence, the applicant must submit a Dangerous Goods Handling and Transportation Act Application form along with supporting information requested in the guidelines to the Environmental Approvals Branch, Manitoba Environment and Climate Change.

The form, the additional information required, and the details of the environmental assessment and licensing process can be obtained from:

The Environmental Approvals Branch  
 Manitoba Environment and Climate Change  
 Box 35, 14 Fultz Blvd.  
 Winnipeg, MB R3Y 0L6  
 Phone: (204) 945-8321 Email: [EABDirector@gov.mb.ca](mailto:EABDirector@gov.mb.ca)  
 Website: [Environment and Climate Change | Province of Manitoba](https://www.gov.mb.ca/environment/climate_change/)

### 23. How do I apply for a Manitoba Receiver Number (MBR no.) for hazardous waste?

A receiver registration number (Provincial Receiver Registration ID.) is assigned to a facility when The Dangerous Goods Handling and Transportation Act Licence is issued. In addition, a receiver registration number is also assigned to a used oil collection facility that is exempted from the licensing requirements by the Dangerous Goods Handling and Transportation Act.

This identification number enables the department to track the waste from origin to final disposal. These numbers are site-specific and stakeholder specific. Receiver registration number must be used on all movement documents. You do not have to submit any forms to obtain this registration number.

## Used Oil and Used Oil Filters

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### 24. Is used oil a hazardous waste?

Yes. Used oil is included in Schedule A of the Hazardous Waste Regulation and identified as hazardous waste. Used oil is assigned with the Provincial Waste Code: MHW1.

### 25. Are used oil filters classified as hazardous waste?

Yes. Used oil filters are included in Schedule A of the Hazardous Waste Regulation and identified as hazardous waste. However, used oil filters that have been drained for 24 hours and crushed to a minimum of 75% volume compaction are not considered to be hazardous waste in Manitoba. Used oil filters are assigned with the Provincial Waste Code: MHW2.

**26. I am planning to set up and operate a used oil collection facility. Do I need to apply for a hazardous waste disposal facility licence under The Dangerous Goods Handling and Transportation Act?**

A hazardous waste disposal facility licence is not required for a used oil collection facility if the total used oil storage capacity of the facility does not exceed 5,000 litres. However, this licence exempted facilities are still required to comply with applicable regulatory criteria specified in the hazardous waste regulation (specifically the sub sections 10.7 to 10.14 of the regulation).

For further details, please refer the “Guidelines for Used oil Collection and Used Oil Burner Facilities exempted from the act”: [guideline-usedoil.pdf](#)

**27. I am planning to set up and operate a used oil burner (space heating) facility. Do I need to apply for a hazardous waste disposal facility licence under The Dangerous Goods Handling and Transportation Act?**

A hazardous waste disposal facility licence is not required for a used oil burner or a combination of used oil burners, with a heating capacity that does not exceed 500,000 Btu/hr. However, this licence exempted facilities are still required to comply with the applicable regulatory criteria specified in the hazardous waste regulation (specifically the sub sections 10.2 to 10.5 of the regulation).

For further details, please refer the “Guidelines for Used oil Collection and Used Oil Burner Facilities exempted from the act”: [guideline-usedoil.pdf](#)

**28. I pick up used oil from a local auto mechanic shop to burn in my used oil burner space heater located on my property. Do I need a carrier licence to pick up a drum of used oil?**

Yes. A licence to transport hazardous waste will be required to transport a drum of used oil from the auto mechanic shop to your property. This is due to the following reasons:

- (a) used oil is a hazardous waste, and
- (b) the quantity transported (a drum = ~205 L) is greater than the exempted quantity (20 L) – as per section 13 (c) of the Hazardous Waste Regulation.

You can apply and obtain a licence to transport hazardous waste or use the services of a licensed hazardous waste transporter who is authorized to transport used oil. For a list of licensed hazardous waste transporters, please visit: [hazardous\\_waste\\_carriers.pdf](#)

## Waste Antifreeze

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**29. Is waste antifreeze a hazardous waste?**

Antifreeze, also known as an engine coolant, is primarily composed of ethylene glycol or propylene glycol concentrate and water, which is used in automobile engines to regulate the temperature. Waste antifreeze in itself is not considered a regulated hazardous waste. However, it can become a hazardous waste if it becomes contaminated with other hazardous materials, such as oil, fuel, and heavy metal particles and exhibits the hazardous characteristics of those contaminants.

## Hazardous Waste Movement Document (Manifest)

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### 30. What is a hazardous waste movement document?

The hazardous waste movement document, which is also known as the manifest, is a special shipping document for hazardous waste. Each movement document has a unique reference number and is comprised of six copies. This document is used for tracking the movement of hazardous waste from the generation site to the location where it is received for disposal. The generator, carrier and receiver of the waste are each required to complete specific parts of the document.

### 31. Where can I obtain the hazardous waste movement document?

Hazardous waste movement document forms may be purchased from:

Canada Map Sales  
 14 Fultz Blvd., Winnipeg, MB R3Y 0L6  
 Tel: (204) 945-6666, Toll free: 1-877-627-7226  
 Fax: 204-945-1365  
 Email: [mapsales@gov.mb.ca](mailto:mapsales@gov.mb.ca)  
<http://www.canadamapsales.com/en/index.html>

### 32. I am a registered hazardous waste generator. Do I need to send copy 1 of the movement document to the department when the hazardous waste was accepted by the carrier for shipment?

No. A registered generator does not need to send copy 1 of the movement document to the department. Instead, you will retain this copy for at least two years and must produce to an environment officer upon request.

### 33. My company is a registered hazardous waste receiver. Do I need to send copy three of the movement document to the department when the hazardous waste was accepted from the carrier?

No. You as a registered receiver need not send copy 3 of the movement document to the department. Instead, you will retain this copy for at least two years and must produce to an environment officer upon request.

### 34. What is a Waste Multiple Pickup Record?

A Waste Multiple Pickup Record is required when a carrier is transporting hazardous waste from more than one consignor and using the same movement document to record the hazardous waste received from all consignors. A carrier must use the approved Waste Multiple Pickup Record form to record information. An approved [waste multiple pickup record form](#) can be downloaded from the [Hazardous Waste Program webpage](#).



**35. Does Manitoba Environment and Climate Change require copies of the movement document from the consignors and consignees for the cross-border movement hazardous waste?**

Manitoba Environment and Climate Change does not require hazardous waste generators and receivers involved in the cross-border movement of hazardous waste to submit copies of movement documents (Copy 1 and Copy 3) to the department. As per the Hazardous Waste Regulation, M.R. 195/2015, copies of the movement document will have to be retained by the consignors and consignees for at least two years.

**36. What is a Canadian Notice and Movement Tracking System (CNMTS)?**

CNMTS is the database and management system used by Environment and Climate Change Canada (ECCC) to collect, store, and process transboundary shipments of hazardous waste and hazardous recyclable material information. This online self-service application allows companies to use the module to create and submit movement document information online for international shipments and generate interprovincial movement documents.

For further information on ECCC's CNMTS and the movement tracking module, please contact ECCC:

Waste Reduction and Management Division  
 Environment and Climate Change Canada  
 Tel: 1-844-524-5295 | Email: [ec.dm-md.ec@canada.ca](mailto:ec.dm-md.ec@canada.ca)  
 Website: [www.canada.ca/hazardous-waste](http://www.canada.ca/hazardous-waste)

**37. Does the movement document template of the CNMTS acceptable to Manitoba provincial regulatory requirements?**

The template of the movement document generated in CNMTS is generally acceptable to the department. However, if a Manitoba consignor wishes to use a CNMTS generated movement document for interprovincial shipments and to record more than four types of wastes, the consignor must use an additional movement document to record those additional waste types in order to comply with the Manitoba provincial regulatory requirements.

**Note:** Hazardous Waste Regulation [Subsection 18 (4)] requires that if more than four types of hazardous waste from one consignor are to be transported in a single shipment, additional movement documents need to be used to record the hazardous wastes.

**38. Is it mandatory to use CNMTS generated movement documents for transboundary shipments of hazardous wastes?**

- For international shipments, the use of CNMTS created movement document is mandatory as per the federal Cross-border Movement of Hazardous Waste and Hazardous Recyclable Material Regulations, SOR/2021-25.
- For interprovincial shipments, it is an option to use CNMTS movement document template. If CNMTS generated movement documents are not used, then the movement document approved by the department must be used for interprovincial shipments originating from Manitoba.

### **39. Is it possible to use CNMITS to generate movement document for intra-provincial shipments of hazardous waste?**

Since, CNMITS is a federally managed system designed for shipments of hazardous waste and hazardous recyclable materials crossing Canada's international, inter-provincial, and territorial borders (transboundary movement), the system cannot be used for generating movement documents for intra-provincial shipments. Intra-provincial shipments continue to be regulated by the provinces and territories.

For intra-provincial shipments, the movement documents continue to be available for purchase from Canada Map Sales: <http://www.canadamapsales.com/en/index.html>

### **40. Does the movement document approved by the department meet the shipping document requirements of the Federal Transportation of Dangerous Goods Regulations (TDGR)?**

A hazardous waste movement document approved by the department meets the TDGR requirements and qualifies as a TDG Shipping Document when transporting hazardous waste that are also dangerous goods, provided that if the information entered meet the TDGR Shipping Document requirements.

Please refer the [Transport Canada Bulletin on Shipping Document Requirements](#).

## **Annual Hazardous Waste Receiver Report**

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### **41. What is an Annual Hazardous Waste Receiver Reporting?**

A hazardous waste disposal facility that receives hazardous waste from offsite must submit to the director an annual hazardous waste receiver report respecting the hazardous waste received by the facility each year and the manner in which the waste was treated or disposed.

The annual report is to be submitted on a form or format approved or acceptable to the director. The report is due to the director by March 31st of each year following the year being reported. The [annual hazardous waste receiver report](#) form can be found under the "Forms" section of the [Hazardous Waste Program webpage](#). Please use this form to report the information or create your own table using this format to submit the report.

### **42. How do I submit the completed Annual Hazardous Waste Receiver Reports?**

You can submit the completed reports to the appropriate [Regional Offices](#) of the Environmental Compliance and Enforcement Branch for your region.

## **Polychlorinated Biphenyls (PCBs)**

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### **43. What are the minimum number of Polychlorinated Biphenyls (PCB) containing florescent light ballasts that can be (a) stored without obtaining a "PCB storage site registration" and (b) disposed of without obtaining a "prior written approval"?**

By way of regulation, the department prescribes the following approach for the management of PCB containing florescent light ballasts (FLBs) taken out of service for storage and disposal:

- (a) PCB Storage Site Regulation applies to more than 1 Kg of PCBs stored at a site. Based on the estimation that a standard FLB contains approximately 25g of PCB, approximately 40 ballast units would need to be collected before triggering the maximum storage quantity of 1 Kg of PCB [40 x 25g = 1 Kg]. Therefore, a storage site registration is not required if a site:
  - stores 40 or fewer FLB units, or
  - removes FLBs from the site prior to the site accumulating 40 FLB units.
- (b) A generator would not require a prior written authorization for the disposal of 40 or fewer FLB units as this quantity would be exempt from the regulation. Note that the generator must comply with all other applicable requirements specified in the Hazardous Waste Regulation.

## Reporting of Environmental Emergency / Accidents

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### 44. How do I report an Environmental Emergency to the department?

In the event of an environmental emergency, immediately report the event by calling the 24-hour Environmental Emergency Report Line at 204-944-4888 (toll free 1-855-944-4888). The report shall indicate the nature of the release, leak, spill or discharge, the time and estimated duration of the event and the reason for the release, spill leak or discharge.

The requirements for reporting an environmental accident, and a schedule of the reportable amounts of regulated materials can be found in the [Environmental Accident Reporting Regulation](#).

## Household Hazardous Wastes

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### 45. Where can I properly dispose of household hazardous waste?

Many Eco-Depots across the province accept household hazardous wastes. Find your nearest Eco-Depot by visiting the [WasteWise](#) website. WasteWise is a hub for residents and industries to get information about waste reduction options in Manitoba, including information on finding recycling locations and identifying recyclable items.

In addition to these permanent collection locations, there are recycling events held around the province, including in rural and remote communities that do not have permanent collection locations. Please contact your local municipality for details about recycling events.

## Contact information

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### 46. Where can I get more information?

For additional information on the contents of these Frequently Asked Questions or Hazardous Waste Legislation, please contact:

The Hazardous Waste Program  
 Environmental Compliance and Enforcement Branch  
 Manitoba Environment and Climate Change  
 14 Fultz Blvd, Winnipeg MB R3Y 0L6  
 Email: [HazardousWaste@gov.mb.ca](mailto:HazardousWaste@gov.mb.ca)  
 Website: [Environment and Climate Change | Province of Manitoba](#)

OR

[Regional Offices](#), Environmental Compliance and Enforcement Branch

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