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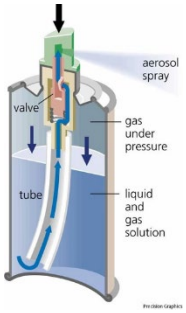
Waste Aerosol Cans
Fact Sheet

Aerosols are in widespread use throughout industry. Aerosol cans are used to dispense a very large variety of products, including paints, solvents, pesticides, lubricants, cleaners, disinfectants, insulation foams, and more. This fact sheet has been prepared to help you understand the regulatory requirements for the safe management of waste aerosol cans generated by your business. This fact sheet provides compliance information for small quantity handlers of universal wastes (SQHs) but is not meant to be a complete reference to all applicable regulations.

What is an aerosol can?

Aerosol cans are produced in many shapes and sizes, but they all have these things in common:



- ✓ They are non-refillable containers
- ✓ They contain a pressurized gas propellent, usually liquified gas, which serves to expel a product from the container
- ✓ They are fitted with a self-closing release valve

Empty Waste Aerosol Cans

A waste aerosol can is empty when all the contents have been removed through normal usage. Empty aerosol cans may be managed as regular solid waste or scrapped. Be sure to contact your local solid waste program or metal recycler to ensure they accept empty waste aerosol cans.

Waste Aerosol Cans that are NOT Empty

Waste aerosol cans that are **not** empty are hazardous and may **not** be discarded into the regular trash. They must be managed as either hazardous waste or universal waste. Managing allowable wastes as universal rather than as hazardous may be preferable because the requirements are usually less stringent, and the wastes are recycled, not disposed of.

Hazardous Waste Aerosol Cans (40 CFR Part 262)

- ✓ Perform accurate waste determinations
- ✓ Manage and dispose of as hazardous waste
- ✓ Keep disposal records for ≥3 years
- ✓ Allowed to puncture and drain (see reverse)

VSQG and SQG compliance guidelines are available

Universal Waste Aerosol Cans (40 CFR Part 273)

- ✓ New management option
- ✓ Manage and recycle as universal waste
- ✓ Can include any waste aerosol can
- ✓ Allowed to puncture and drain (see reverse)

See reverse for SQH compliance guidelines

The guidance below is intended for ***small quantity handlers of universal waste (SQHs).*** Small quantity handlers never have more than 11,000-lbs (5,000-kg) of universal wastes on site at any time during the calendar year. This includes all universal wastes, not just aerosol cans.

SQH Requirements for Waste Aerosol Cans

- ✓ Store them in containers that are:
  - structurally sound and undamaged
  - protected from sources of heat
  - compatible with the cans' contents
- ✓ Store leaking aerosol cans separately in a closed, labeled container
- ✓ Immediately respond to releases
- ✓ Label them with one of these phrases:
  - "Universal Waste—Aerosol Can(s)"
  - "Waste Aerosol Can(s)"
  - "Used Aerosol Can(s)"

- ✓ Inform employees of proper handling and emergency procedures
- ✓ Ship them within one year
- ✓ You may conduct the following activities on **intact** waste aerosol cans:
  - sort aerosol cans by type
  - mix intact cans in one container
  - remove actuators/nozzles to reduce the risk of accidental release

- ✓ You may puncture and drain them under specific conditions, as outlined below.

Conditions for Puncturing and Draining Waste Aerosol Cans

ALL Generators and Handlers

Use a device designed to safely puncture aerosol cans and contain residual contents and emissions

Put the equipment on a solid, flat surface in a well-ventilated area

Train employees to use it correctly

Drain punctured cans directly into an appropriate collection container

Universal Waste Handlers Only

Keep these items on site

- ✓ written spill plan
- ✓ spill kit
- ✓ equipment manual(s) / specifications
- ✓ written SOP for the unit including:
  - assembly and maintenance
  - safe puncturing and draining
  - management of resulting wastes

After puncturing you **MUST**

Recycle the empty cans

- and -

Perform an accurate hazardous waste determination on the collected contents