

Responsible Management of Waste Aerosol Cans for Businesses, Schools and Government Agencies

Aerosol cans sometimes need to be disposed of before they are completely empty. This occurs for a variety of reasons, including when the spray mechanism no longer operates as designed, the propellant is spent before the product is used up, or the product is no longer used at the facility.

Which aerosol cans are regulated as hazardous waste?

If you must dispose of aerosol cans that still have product in them, you will need to determine if the contents remaining in the can are hazardous waste before you decide how to dispose of the can. The contents of the can will be hazardous waste if the material exhibits a *characteristic* of hazardous waste (such as ignitability) or if it is a *listed* waste (such as acetone). Most aerosol cans have warnings that the contents are under pressure and/or not to puncture the cans in an uncontrolled manner or they can explode. These warnings alone do not mean that the aerosol can is considered to be a hazardous waste. That determination is based on the contents remaining in the can.

It is important to remember that the contents remaining in an aerosol can would not be considered spent and therefore would not carry the hazardous waste F-codes for spent solvents. An aerosol can may, however, carry a P- or U-code for unused chemical products.

Which aerosol cans are not regulated as hazardous waste?

Aerosol cans that are still in use and that contain useable product are not yet considered to be wastes. Aerosol cans that are empty or that contain materials that are not themselves hazardous wastes may be managed as solid waste. Information on the characteristics and ingredients of the can contents can be found on the Material Safety Data Sheet (MSDS), which you can get from your supplier or the product manufacturer.

How should you manage aerosol cans containing hazardous wastes?

If you have aerosol cans containing hazardous waste that no longer work or that you no longer need, do NOT dispose of them in the trash. You should store the cans safely until you are able to dispose of them properly. You may choose to manage your waste aerosol cans under the full requirements of the hazardous waste regulations or under the less restrictive requirements of the universal waste rule, as described here.

Each can should be labeled as "Waste Aerosol Can" or "Universal Waste Aerosol Can," or the cans can be put into an accumulation container that is in good condition and capable of preventing a release in case one of the cans starts to leak. If the aerosol cans are placed into a container, only the container needs to be labeled as "Waste Aerosol Cans" or "Universal Waste Aerosol Cans," not the individual cans within it.

Your employees should be thoroughly familiar with how to manage these cans and what to do in case of a spill or release. Always have a spill kit or other material available to help contain and clean up a spill. Spill cleanup materials are available from scientific and safety supply companies.

Contact a hazardous waste disposal company for assistance in disposing of the aerosol cans. Companies that provide these services can be found in your local yellow pages or on Internet "yellow pages" directories under listings for *waste disposal - hazardous*. Although these companies may not be in your local phone directory, most operate throughout the state.

Sometimes your product supplier will take back aerosol cans that still contain product. This is acceptable as long as the cans are returned to the manufacturer so that the remaining material can be removed and reused in new products.

Can you puncture aerosol cans to reduce the volume and consolidate the wastes into one container?

Controlled puncturing of waste aerosol cans is allowed as long as you first develop and implement a written procedure detailing how to puncture the cans safely. You'll need to include the type of equipment to be used, operation and maintenance of the equipment and the precautions that need to be taken to protect your employees. In addition, the document must include a review of the wastes that will be generated from the puncturing activities and how the waste will be managed. At the point the waste is removed from the can, it must be included in the determination of your hazardous waste generator status. Contact a hazardous waste disposal company for assistance in disposing of the consolidated wastes from the aerosol cans. Once the waste aerosol cans have been emptied, the cans themselves can either be recycled as scrap metal or disposed of as solid waste.

Where can you go for more information?

For more detailed information on managing aerosol cans, see the Management of Waste Aerosol Cans compliance bulletin at www.colorado.gov/cs/Satellite/CDPHE-HM/CBON/1251615961696 . You may also email questions to comments.hmwmd@state.co.us or call the customer Technical Assistance Line at 303-692-3320 or 1-888-569-1831 ext. 3320 toll-free.



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This is designed to provide general guidance on the appropriate management of wastes and is not intended to provide a comprehensive analysis of all regulatory requirements.