

UNIVERSAL WASTE

How to Manage Aerosol Cans



Department of
Environmental
Conservation

Businesses, institutions, and government entities are required to properly manage the hazardous waste that they generate at their facility. Certain types of hazardous wastes may also be managed under a streamlined set of requirements called the universal waste (UW) regulations. Entities that generate this waste can choose to manage eligible wastes under either the universal waste regulations or the normal hazardous waste regulations.

What is a Universal Waste Handler?

Entities that generate or manage universal waste are referred to as “universal waste handlers.” Universal waste handlers fit into one of two categories: Small Quantity Universal Waste Handlers (SQH), who store less than 5,000 kg (11,000 lb) of total universal waste at their facility; and Large Quantity Universal Waste Handlers (LQH), who store 5,000 kg or more of total universal waste at their facility. Universal waste handlers are not allowed to treat, dilute or dispose of universal waste at their facility.

What is a Universal Waste Aerosol Can?

A **universal waste aerosol can** is a non-refillable receptacle containing a gas that is compressed, liquefied, or dissolved under pressure, the sole purpose of which is to expel a liquid, paste, or powder and fitted with a self-closing release device allowing the contents to be ejected by the gas. These items are usually made of a can or container, actuator button, valve, propellant, product, and dip tube.



Note: Gas cylinders, like propane or acetylene tanks, are not “aerosol cans” and must be managed under the normal hazardous waste regulations.

How to Handle UW Aerosol Cans:

A Small Quantity or Large Quantity Universal Waste Handler must do the following:

1. **Storage Time:** Store the universal waste for any period less than one year. The handler must demonstrate compliance with this time limit by doing **one** of the following:
 - a. label the container with the date that UW was first placed in the container;
 - b. mark/label each UW item with the date discarded, or use an inventory system to accomplish the same goal;
 - c. identify the date that UW was first placed in a particular area; or
 - d. any other method that clearly demonstrates compliance with the storage time limit.
2. **Containers:** Intact aerosol cans must be stored in suitable containers and protected from sources of heat. Aerosol cans with incompatible contents cannot be stored in the same container. (Management of broken or leaking aerosol cans is covered in “Item 4 Leaking, Spilled or Broken Universal Waste.”)

3. **Labeling:** Label the universal waste with **one** of the following phrases: “Universal Waste—Aerosol Can(s)”, “Waste Aerosol Can(s)” or “Used Aerosol Can(s)”.
4. **Leaking, spilled, or broken universal waste:** Aerosol cans that show evidence of leaking must be packed separately, immediately punctured and drained, and/or overpacked with absorbents. All releases of universal waste must be immediately contained and properly managed. Once removed from the aerosol cans, the contents of the aerosol cans must be assessed to determine if they are hazardous waste. If the contents are hazardous waste, they must be managed under the normal hazardous waste regulations.
5. **Training:** All employees who handle or manage UW must be informed of handling and emergency procedures;
6. **Prohibitions:** The handler is prohibited from sending or taking the UW to a place other than another UW handler, a destination facility, or a foreign destination.
7. **Recordkeeping:** Keeping records of shipments is recommended for SQHs, but it is required for LQHs.

What Activities Can Handlers of Universal Waste Aerosol Cans Conduct?

Small Quantity and Large Quantity Universal Waste Handlers can:

- Sort aerosol cans by type;
- Store multiple intact cans in a single container (if the contents are compatible);
- Remove actuators to reduce the risk of accidental releases; and
- Puncture and drain aerosol cans generated by their own facility.

Large Quantity Universal Waste Handlers can also:

- Puncture and drain aerosol cans generated by another universal waste handler or off-site facility.
 - **Note: SQHs may puncture and drain cans generated by another handler or off-site facility if the SQH complies with LQH requirements (including getting an EPA ID number if they do not already have one).**

When Puncturing and Draining Aerosol Cans, the Handler Must:

1. Puncture and drain the cans using a device made to safely puncture aerosol cans;
2. Establish and follow a written procedure for safely puncturing and draining the aerosol cans;
3. Ensure that puncturing is done in a manner designed to prevent fires and releases of any component of the cans to the environment;
4. Immediately transfer the contents of the aerosol cans or puncturing device to a container or tank that is compatible with the material being removed from the cans or device. Ensure that incompatible materials are not placed in the same container;
5. Send the emptied aerosol cans for scrap metal recycling; and
6. Properly characterize and dispose of the contents and filters generated from use of the puncturing equipment in compliance with applicable hazardous and solid waste regulations.

Please note that Clean Air Act regulations may also apply to the puncturing of aerosol cans.