

Hazardous Waste Procedure

Aerosol Can Disposal

I. Purpose

To manage, recycle, and document the disposal of aerosol cans in accordance with state and federal hazardous waste regulations. Aerosol cans usually contain a small amount of material even when they no longer expel their contents or otherwise appear to be empty. The Nebraska Department of Environment and Energy (NDEE) considers aerosol cans (whether full, partially-full, or apparently empty) to be hazardous waste when disposed because they can rupture when heated.

Since aerosol cans are regulated when disposed, they must not be discarded as ordinary refuse in trash cans or dumpsters.

All unwanted, partially full, and apparently empty aerosol cans must be disposed via EHS, including the seemingly most innocuous materials (*e.g.*, canned air, deodorizer, oil/lubricants, whipped cream, etc.).

II. Disposal of Aerosol Cans

Custodial Services will collect empty cans from the campus and place them in the appropriate containers. Additionally, select locations across campus that generate larger quantities of aerosol cans will have their own containers. The recycling crew will be responsible for collecting the empty cans from the containers. They will then puncture the cans and dispose of the empty cans as scrap metal. The contents of the barrel that the cans are emptied into will be characterized and disposed of in the appropriate manner, depending on the contents of the barrel. No pesticide cans can be punctured or disposed of in the regular trash.

Because Creighton recycles the empty, punctured cans as scrap metal, these cans are excluded from being hazardous waste. See the NDEE's Guidance Document #05-181, "Aerosol Can Waste" for further information.

III. Instructions for Facilities Management

- Keep unpunctured cans in a container with a secured lid labeled "Used Aerosol Cans"
- Puncture empty cans safely using the approved apparatus
- Collect contents of cans, if any, in drum attached to puncturing apparatus.
- Keep a list of what types of materials were put in the can (*e.g.* 4 x steriphen).
- Handle empty, punctured cans as scrap metal (*i.e.* put in scrap metal dumpster)

IV. Hazardous Waste Determination

The contents collected in the aerosol can puncturing drainage collection drum need to be correctly characterized. All waste generators must determine the quantity of hazardous waste they generate in a calendar month. As such, a log should be kept (see the attachment) to make an accurate determination of the waste.

If a can that is punctured is not empty, and the contents are a listed waste, the waste must be characterized as the listed waste, because the solvent was not spent; it is unused, but not "spent". For this reason, Creighton needs to carefully document any non-empty cans that are punctured.

Updated December 2022

Attachment 1. Aerosol can logsheet

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