

Aerosol Cans as Universal Waste? New Regulations. New Options.



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Comprehensive Environmental Solutions

OUTLINE

- Overarching Changes
- What is an Aerosol Can?
- Exclusions
- Generator Requirements
- Universal Waste Handler Requirements
- Handler Options



OVERARCHING CHANGES

- Effective date of the Federal rule was February 7, 2020 (40 CFR Part 273)
- Missouri has adopted and incorporated by reference (10 CSR 25-16.273)
- Publications, helpful docs, and more available soon on MDNR's website

what are other
words for
overarching?



overall, widespread,
all-embracing, comprehensive,
throughout, underlying,
universal, extensive, sweeping



AEROSOL CAN DEFINITION

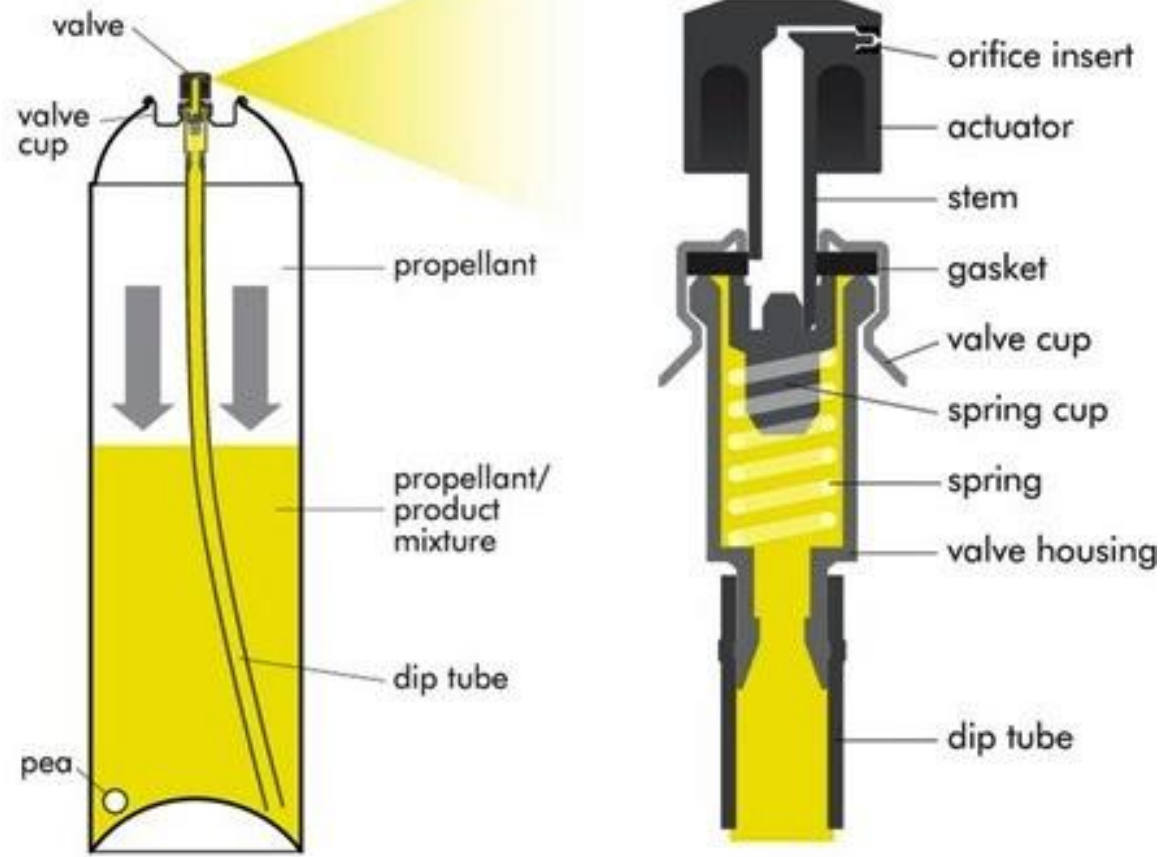
“A non-refillable receptacle containing a gas compressed, liquified, or dissolved under pressure, the sole purpose of which is to expel a liquid, paste, or powder and fitted with a self-closing release device allowing the contents to be ejected by the gas”.



**U.S. Department
of Transportation**



PARTS OF AN AEROSOL CAN



HAZARDOUS VERSUS NON-HAZARDOUS AEROSOL



Hazardous

Non-Hazardous



EXCLUSIONS FROM THE RULE

- Aerosol cans that are not yet waste
- Aerosol cans that are not hazardous waste
- Aerosol cans that have been emptied of contents (propellant and product)



MANAGEMENT OF AEROSOL CANS AS A GENERATOR

- Universal Waste Generator Limits are the same
 - Small Quantity Handlers of Universal Waste: < 5,000 kg
 - Large Quantity Handlers of Universal Waste: 5,000 kg or more
- Store up to one year on-site from the accumulation start date
- Have the start date on the container
- Labeling / Marking (40 CFR §273.14)
 - “Universal Waste – Aerosol Can(s)”
 - “Waste Aerosol Can(s)”
 - “Used Aerosol Can(s)”



MANAGEMENT OF AEROSOL CANS AS A GENERATOR

- **Storage**
 - Store *AWAY* from heat sources
 - Have spill kits nearby
 - Store in compatible containers
 - No requirement for separation of incompatibles
 - If leaking – must package in separate, closed container



MANAGEMENT OF AEROSOL CANS AS A GENERATOR

- **Training**

- SQHUW – basic training (40 CFR §273.16)
- LQHUW – basic training geared toward responsibility (40 CFR §273.36)



MANAGEMENT OF AEROSOL CANS AS A GENERATOR

- **Transportation / Shipping Papers (40 CFR 273 Subpart D)**
 - Determine the DOT requirements /hazardous materials
 - SQHUW – not required to keep records of shipment. (40 CFR §273.19)
 - LQHUW – required to keep records of shipment. (40 CFR §273.39)
 - Examples: bills of lading, receipts, log



MANAGEMENT OF AEROSOL CANS AS A UNIVERSAL WASTE HAND

- Expected larger volumes
- Handlers can store their universal waste up to one year onsite
- Performance based management standards (40 CFR 273.33(e)(4))
 - Recycle the punctured cans



MANAGEMENT OF AEROSOL CANS AS A UNIVERSAL WASTE HAND

- **Performance based management standards (40 CFR 273.33(e)(4))**
 - Aerosol Puncture Units
 - Safely puncture the cans
 - Capture the liquid and the aerosol
 - Written procedures for safely puncturing
 - Trained staff
 - Limit fire and combustible potential
 - Conduct waste determination
 - Written procedure if spill or release
 - Spill kits nearby



AEROSOL CAN UNIVERSAL WASTE HANDLER OPTIONS



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ANY QUESTIONS?



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