

Technical Brief

Aerosols as Universal Waste

In December of 2019, the Environmental Protection Agency published a final rule entitled: Increasing Recycling: Adding Aerosol Cans to the Universal Waste Regulations. This rule adds full or partially-full aerosol cans to the universal waste program. The final rule becomes effective 7-FEB-2020. Here's what you need to know...

Applicability

The rule applies to full or partially-full aerosol cans that would qualify as a hazardous waste. To be a hazardous waste they must either be ignitable, corrosive, reactive, toxic, or contain a listed hazardous waste.

NOTE: *Empty aerosol cans are not hazardous waste and can be recycled. Likewise, aerosols that are not hazardous can be emptied and recycled. Nevertheless, a handler can choose to treat empty and non-hazardous aerosols as universal waste at their discretion.*

Definitions

Universal Waste: Certain types of common hazardous wastes are afforded streamlined handling requirements in order to encourage proper management and recycling. Universal wastes include certain batteries, lamps, mercury-containing equipment, pesticides and now aerosols. See 40 CFR Part 273 for more specific definitions.

Universal Waste Handler: This term includes generators of universal waste and those facilities that receive and store universal waste. It does not include treatment and disposal facilities. A facility that accumulates 5000 kilograms or more of universal waste at any time, is a Large Quantity Handler of Universal Waste. Facilities below this amount are Small Quantity Handlers.

Requirements for Handlers

- Accumulate aerosols in a sturdy, compatible container that is free of damage or leaks
- Leaking aerosols must be packaged in a closed container or overpacked with absorbents
- Waste aerosols or the storage container must be labeled as 'Universal Waste – Aerosol Cans' or 'Waste Aerosol Cans' or 'Used Aerosol Cans'
- Facilities may accumulate waste aerosols for up to 1 year
- Large quantity handlers must submit a notification to the EPA of all types of universal waste managed

Puncturing and Draining Aerosol Cans

Under this rule, universal waste handlers are permitted to puncture and drain the aerosol cans as long as the empty cans are recycled. Handlers must use a device that is specifically designed to safely puncture aerosol cans and effectively contain the residual contents and any emissions. In addition, handlers must establish and follow a written procedure detailing how to safely perform puncturing and draining and how to address spills or leaks. Employees must be trained on these procedures. The drained contents must be properly managed as hazardous waste in accordance with 40 CFR Part 262.

CRC has your Solution

For additional information on the specific requirements of this new rule, please visit the EPA's [website](#). To determine if your CRC aerosols could be a hazardous waste, please consult Section 13 of the product's Safety Data Sheet. These are available on our website at www.crcindustries.com.

If you have additional questions, contact CRC Technical Services at 800-521-3168.