

Business Environmental Program Hazardous Waste Fact Sheet

Aerosol Cans

Many Nevada businesses use aerosol cans in their operations; automotive and heavy equipment maintenance, printing, and various manufacturing operations all tend to generate spent aerosol cans. If an aerosol can is empty (i.e. all product has been used for its intended purpose and the propellant inside the can has been discharged) it may be disposed of as a non-hazardous solid waste (40 CFR 261.7)

Nevada businesses encounter situations when aerosol cans get clogged or the material inside the can has exceeded its shelf-life date; in these cases, the can is not empty and the pressure inside the can has not been discharged. Applying the United States Environmental Protection Agency (EPA) regulations to a situation where a business has a clogged or off-specification aerosol can, the business is required to determine whether the contents inside the clogged or off-specification can are considered a hazardous waste. Aerosol cans that are not considered empty (due to residual material and/or pressure) can be a real problem for a small business. Suppliers typically will not take back clogged or off-specification cans from a business which only purchases 10 or 15 cans of product a month yet may be more flexible when dealing with a large buyer of their products. The EPA regulations would require businesses to manage these few aerosol cans as hazardous waste even though households routinely dispose of aerosol cans as normal household trash.

Aerosol can aspirators are commercially available, and may prove to be a cost effective waste management investment for businesses generating a number of aerosol cans containing residual or off-specification material. The EPA has concluded the process of emptying (aspirating) the aerosol cans is part of a recycling process (i.e., scrap steel recycling), this activity would be exempt from RCRA regulation under 40 CFR§261.6 (c) (except as specified in 40 CFR§261.6(d)). Once the cans are drained and de-pressurized, they are considered empty containers and are not regulated as hazardous waste. Businesses should be aware of health and safety concerns associated with puncturing aerosol cans and should use equipment designed for this purpose. Aspirating aerosol cans less than 1 gallon in size is considered a "Trivial Source" by the Nevada Bureau of Air Pollution Control and presumptively omitted from a Class I, Class II, Class III permit application. Obviously, the best strategy is to take proper care in storage and use of aerosol products and to practice good inventory control so that all aerosol products purchased are used for their intended purpose rather than being disposed of.

Businesses using large quantities of an aerosol product may want to consider utilizing refillable spray bottles and purchasing the product (lubricant, cleaners, etc.) in bulk. When you consider 10-15% of the weight in an aerosol can is just propellant, the cost of the actual material used is very expensive! Studies have documented pay back time for switching to a refillable bottle operation can be less than 6 months. Taking into account the reduced cost of the product, not having to manage spent or partially full aerosol cans, and having control of the operation makes good sense.

If you are interested in refillable spray bottles, please contact the Business Environmental Program for a complete study, call (in state) (800) 882-3233 or (775) 689-6688. Visit the Business Environmental Program "online" at www.nsbdcnep.org.

Note: Aerosol cans which contain material, or remain under pressure should not be disposed to an "onsite waived landfills" such as those found at mine sites.

<http://www.envnv.org>

**BEP Toll-Free Assistance Line (800) 882-3233 (In Nevada) or (775) 689-6688
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