AEROSOL CAN DISPOSAL

Duke University, Duke University Medical Center, and Duke University Health Systems produce a variety of aerosol cans that are subject to regulatory management standards and, if improperly managed in the department, could pose a safety risk to Duke Personnel and the environment. Aerosol cans contain both the product (i.e. paint, adhesive) and propellant (i.e. propane, butane) which may have hazardous properties (i.e ignitable, toxic). This procedure applies to all departments at Duke University, Duke University Medical Center, and Duke University Health Systems who generate aerosol can waste.

Disposal

Used, unused or unwanted aerosol cans used in a commercial/industrial setting are considered to be a hazardous waste under 40 CFR 261.1 unless the following criteria are met:

- The aerosol products have been used for their intended purposes so that when holding the cans upright and pressing down on their nozzles, not enough product comes out for them to be useful anymore;
- No more than 3% of the original net content weight remains in the cans, or no more than one inch of liquid remains in the bottoms of the cans (40 CFR 261.7(b)(1)(1) and (111);
- Although the aerosol can meets the above criteria and could be considered non-hazardous, the propellant left in the can may still be reactive under heat or pressure, which requires the can be handled as a hazardous waste. However, puncturing and draining the can would meet the definition of scrap metal (40 CFR 261.1(c)(6)) and the can could then be recycled as an exempt waste (non-regulated).
  - The liquid drained from the can from puncturing must be collected and managed as a chemical waste.
- The cans did not hold chemical formulations with sole active ingredients identified in the F027 (used and unused formulations for wood preserving) or P-list hazardous waste.

Note: Cans of spray pesticides (i.e. wasp spray), caustics (i.e. oven cleaner), and ether (i.e. starting fluid) should not be punctured and should be submitted for disposal as a hazardous waste.
Aerosol cans that are still in use are not considered a waste. Once the user decides they no longer need the can, they can either: 1) purchase an aerosol can recycling system to puncture the can, capture any liquid left in the can in a 55 gal drum (provided by OESO), and dispose of the empty can as a scrap metal or 2) submit the can to OESO Environmental Programs for proper management as a regulated waste in accordance with the Chemical Waste Management Practice.