
Aerosol Can Universal Waste Disposal Work Instructions

University of Tampa Personnel

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The United States Environmental Protection Agency [USEPA] has recently completed its final rulemaking regarding “universal wastes” that now considers streamlining regulations for facilities that need to regularly discard empty aerosol containers.

EPA added hazardous waste aerosol cans to the ‘universal wastes’ category regulated under title 40 of the Code of Federal Regulations (CFR), part 273 of the Resource Conservation and Recovery Act (RCRA) regulations.

Three Ways to Comply with the New Rule

1. Continue collecting, storing, and disposing of hazardous aerosol cans as Hazardous Waste. This is the least cost-effective approach.
2. Collect, store, and dispose of aerosol cans as Universal Waste under your Small Quantity Universal Waste Generator Status. This will include:
 - a. Notify the EPA about your waste activities.
 - b. Accumulate the waste aerosol cans in a metal 55-gallon drum.
 - c. Label the collection unit as “Universal Waste—Aerosol Cans.”
 - d. Mark the label with the date of the day accumulation started and accumulation dates cannot exceed one year.
 - e. Train all personnel on proper waste collection practices
 - f. *Do Not* containerize leaking or damaged aerosol cans as universal waste. Instead, they will have to be managed as hazardous waste.
3. You can collect the empty aerosol cans by EPA’s definition of “empty” and recycle the leftover product as scrap metal. This option requires that the can pressurization be removed and no more than 3% of total weight capacity remains in the container. Also, the container pressure must equal atmospheric pressure.

Please note: The EPA stipulates the following requirements when a can puncturing device is used:

- The operating unit’s manufacturer’s instructions must be maintained on site.
- The operating unit must be situated on a flat surface and in a well-ventilated area.
- A hazardous waste determination must be made on the waste drum.
- All hazardous waste regulations for the facility’s generator status apply to the collected waste.

- A spill cleanup kit needs to be in place.

An example of a can puncturing device is shown in this link: [Aerosol Can Puncture Device](#)

Any liquid waste removed in the process must be characterized for the disposal waste classification and managed as hazardous waste, in most cases, due to flammability. As a result, waste collection will be required:

- Use a metal, closed collection drum.
- Ground the drum via a ground wire connected to a grounded object such as a conduit or water pipeline.
- Apply a “Hazardous Waste” label to the drum and fill out the appropriate sections on the label.
- Mark the label with an accumulation start date.
- Label the drum with a “Flammable or Ignitable” label.
- Follow further generator hazardous waste requirements based on your facility’s generator status.