Focus On: Aerosol Can Management

The intent of this guidance is to help you properly manage waste aerosol cans, which contain or have contained paints, solvents, and other commonly used products.

Why do we care about aerosol cans?

Aerosol spray cans are easy to use but their disposal may pose special risks to workers and the environment. The contents of full or partially full cans are under pressure, often toxic, and may be flammable. Because of these risks and possible classification as a dangerous waste, carefully evaluate aerosol can disposal.

When is a can empty?

A can is empty when completely sprayed out and minimal or no product remains in the can. By regulation, residue remaining in an empty can cannot be more than three percent by weight or more than one inch. A simple shake test may be sufficient to determine this. Do not spray out contents to empty the can. If possible, use any remaining aerosol product for its intended purpose.

Ecology does not regulate empty aerosol cans as dangerous waste. Empty aerosol cans that contained acutely hazardous “P” listed chemicals continue to be regulated as dangerous waste unless the can is triple rinsed. On-site puncturing and triple rinsing of these cans is not recommended.

What can I do with non-dangerous waste cans?

Ecology does not consider partially full cans with non-dangerous waste contents or propellants (for example, aerosol food products) to be dangerous waste. Avoid placing partially full cans in the trash. Ecology recommends recycling empty cans as scrap metal. Ask your metal recycler if they require you to puncture and drain cans before accepting as scrap metal.

What can I do with dangerous waste cans?

Manage cans with dangerous waste contents in one of the following ways:

1) Puncture and drain on site. Manage the drained liquids as dangerous waste. Ecology recommends recycling punctured cans as scrap metal.

2) Send off site to a permitted dangerous waste treatment, storage, and disposal facility. If possible, pull off the stem or replace the cap on collected cans. Common waste codes might include ignitable (D001), corrosive (D002), F001-F006 solvents, and “U” or “P” listed commercial chemical products. The United States Environmental Protection Agency recommends you also evaluate aerosol cans for D003 reactivity.

To request materials in a format for the visually impaired, call the Hazardous Waste & Toxics Reduction Program at 360-407-6700, Relay Service 711, or TTY 877-833-6341.
Guidelines for puncturing cans

Ecology does not consider puncturing of aerosol cans to be a dangerous waste treatment activity. Generators are allowed to puncture aerosol cans on site for the purpose of removing and consolidating liquid residues. Be aware that puncturing cans may produce explosive vapors. Do not use any puncturing method that releases gases or liquids directly to the environment. It is against the law.

What should I use?

Use commercial puncturing devices that capture vapors. Manage the collected dangerous waste liquid residues under dangerous waste requirements. If puncturing different types of aerosol cans, avoid mixing incompatible materials.

Keep good records

Ecology recommends keeping a log showing the types of chemicals added to the accumulation container. This will help determine which waste codes apply.

Flammable waste

If the waste is flammable, the fire department may require you to ground the containers to prevent sparking.

General dangerous waste management requirements

You must:

- Keep containers of collected liquids closed and in secondary containment.
- Label the container with the major risks—ignitable, corrosive, or toxic.
- Label the container “Dangerous Waste” or “Hazardous Waste.”
- Post emergency information near the phone.

Do aerosol cans count towards my generator status?

Count all dangerous waste aerosol cans generated per month, unless cans are intended to be punctured and drained. If you puncture and drain the cans, count only the collected liquids, not the intact cans.

How do I report aerosol cans on my Dangerous Waste Annual Report?

If you are a medium or large quantity generator, report intact cans or liquids shipped off site on a Dangerous Waste Manifest on your Dangerous Waste Annual Report. You may have to report different waste streams. Report:

- Similar types of intact aerosol cans as a distinct waste stream. Aerosol cans with the same set of waste codes are a distinct, separate waste stream.
- Liquid mixtures collected from puncturing operations as one waste stream.

For annual reporting information call the Annual Reporting Hot Line at 1-800-874-2022 (within WA state only), or (360)407-6170. You can also e-mail questions to Turbowaste@ecy.wa.gov.
**Acutely hazardous waste and extremely hazardous waste**

Send cans that contain or contained pesticides, herbicides, or other extremely hazardous products off site to a permitted treatment, storage, or disposal facility. You should not puncture them. Aerosol cans may be considered acutely or extremely hazardous waste if they contained:

- Acutely hazardous waste (AHW), such as discarded commercial chemical products identified as a “P” listed waste.
- Toxic extremely hazardous waste (EHW).
- Pesticides with a “Danger” or “Warning” label. These are the most common products that become EHW or AHW.

Handle aerosol cans that held AHW or EHW as dangerous waste. Separate them from other types of aerosol cans. You can only send them to a facility permitted to receive AHW or EHW wastes.

You should not try to drain these cans. If you do decide to drain them, contact your dangerous waste compliance inspector for special instructions on dealing with these types of cans.