



37-002-0302

*Just the Facts ...*

## Management Guidance for Aerosol Can Disposal

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- 1. BACKGROUND.** The proper disposal of aerosol cans is a complex issue since there is no definitive rule or guidance on aerosols by the EPA's office of solid waste. Most states are authorized to operate their own programs and guidance varies from state to state. This information paper is based on the response of several states to a USACHPPM questionnaire regarding their interpretation of the proper disposal of aerosol cans.
- 2. AEROSOL CAN DISPOSAL.** Military housing areas are excluded from state and federal guidelines under an exemption found in 40 CFR 261.4(b) for household wastes and residents are allowed to discard aerosol cans in the regular trash stream. Military installations (except for housing areas) are usually required to follow state guidelines proposed for commercial facilities.
- 3. AEROSOL CAN PUNCTURING.** Most states prefer that aerosol can be punctured with an approved device (one that can safely puncture the can, contain the residual contents and filter excess propellant) and sold as scrap metal through DRMO. This process releases residual propellant from the can making it safe for disposal as a solid waste or sold as scrap. The waste generator should consult the MSDS to determine proper disposal of residual contents from the aerosol cans. Aerosol cans containing a P-listed waste as defined in 40 CFR 261.33 should be separated and disposed of as a hazardous waste in accordance with its contents. A few states may require a permit to puncture aerosol cans; consult local regulations prior to initiating a can puncturing program. Several devices are available that will safely puncture the can and contain any residual contents.
- 4. DISPOSAL THROUGH THE REGULAR WASTE STREAM.** Many states allow the disposal of empty aerosol can through the regular waste stream. Most states define empty as those cans from which the contents have been released as much as possible through ordinary means, however, some states are very strict on ensuring that there is not any excess propellant in the can. Installation disposing of aerosol cans through the regular waste stream must be sure the cans meet that state's definition of empty and did not contain a P-listed waste. Pressing the nozzle to release excess propellant and make a can empty is considered a treatment process and is generally not permitted under RCRA guidelines.
- 5. DISPOSAL OF CLOGGED OR UNSERVICEABLE CANS.** Aerosol cans that have become clogged or otherwise unserviceable should be disposed of as a hazardous waste since the contents remain under pressure, and the excess propellants used may be considered an EPA D001 flammable gas (consult 40 CFR 261.21). Many states will allow clogged cans to be punctured and disposed of or recycled as scrap metal provided the exhaust propellants are filtered and the residual contents are disposed of properly. Installations using this process should consult the manufacturers MSDS to ensure

proper disposal of the residual contents in the spray can.

**6. DISPOSAL OF CANS THAT CONTAINED A "P" LISTED WASTE.** In some cases, an aerosol can may have contained a P-listed waste found in the toxic material lists in 40 CFR 261.33. The EPA considers these compounds acutely toxic and the entire container should be disposed of as a hazardous waste. Disposal of the can as a non-hazardous waste requires triple rinsing of the container (spray can) and disposal of the rinsate as a hazardous waste which is not considered a cost effective method of disposal.

**7. ALTERNATE DISPOSAL METHODS.** Hazardous waste companies may offer disposal of used aerosol can for a reasonable cost. Installations that do not produce a large quantity of aerosol cans may find this a cost effective method to keep the post in compliance with local and federal regulations.

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