

Hazardous Waste Management Standard Operating Procedure

AEROSOL CANS

DESIGNATION

Designation is the process of determining whether a waste is regulated under WAC 173-303 and if so, what waste codes apply to it. See Master Forms List for the Designation Checklist form.

Aerosol cans are usually considered dangerous waste by the Department of Ecology and must be disposed of properly. There are two primary ways that aerosol cans become designated as “dangerous waste”. Whitworth’s management of aerosol cans must address each of these criteria sequentially.

- 1) The contents are hazardous (usually toxic and/or flammable – See the Hazardous Waste Management Program for the specific definitions that must be met).
- 2) The contents are under pressure.

Process summary:

1) Empty each can through ‘normal use’. When the contents are considered hazardous or dangerous they must only be used as intended and not wasted or sprayed out just to get rid of them. Doing so is considered treatment in order to avoid proper disposal and is illegal. If it cannot be emptied through normal use, perhaps because of a broken nozzle, then the entire can must be collected as dangerous waste and it must NOT be punctured.

2) Puncture each can with a properly functioning puncture station. Aerosol cans are only considered completely ‘empty’ once the pressure inside is equal to atmospheric pressure. This is achieved by puncturing the container. Puncturing the can allows the release of both liquid residue (which Department of Ecology considers to still meet the definition of dangerous waste and thus it must be collected and handled accordingly) and vapor (which must not be released into the environment – hence the need to properly maintain the filters on the puncture station).

3) Record each puncture station use on the log. It is important to record the number of cans that are processed through the puncture station so that the filters are changed at the appropriate interval.

4) Throw the empty, punctured can in the garbage.

5) Place non-empty cans in the waste drum next to the puncture station and record on the log. Every can that can’t be punctured must be put in the waste collection container whole. Each addition to this container must be recorded on the container log so that the exact contents are known and can be disposed of properly.

SATELLITE ACCUMULATION

Satellite Accumulation is a location at or near the point of waste generation where hazardous waste is initially accumulated prior to consolidation at the 180/90day accumulation area.

Spray cans are used in a variety of locations around campus. Each generating department is responsible to maintain their satellite accumulation in accordance with the University's Hazardous Waste Management Program.

180/90 DAY ACCUMULATION

180/90 day accumulation areas are places where waste is kept when it is removed from satellite accumulation and is awaiting shipment for treatment and disposal.

The 180/90 day accumulation area for spray cans is currently located in a shed behind Facilities Services. The puncture station is in the same location. Facilities Services personnel are tasked with inspecting and maintaining this equipment and area, however it is imperative that everyone that uses this area take responsibility to keep it organized, clean and record all required information on the log sheets.

INSPECTIONS

Weekly inspections of all containers in 180/90day accumulation areas is required by WAC 173-303-630(6). Inspections must include the integrity of containers as well as accuracy and completeness of labels.

Designated Facilities Services personnel accomplish the weekly inspection of this area, as documented on the Facilities Services waste management SOP.

TRANSFER OF WASTE

Transfer of waste from satellite accumulation to 180/90 accumulation occurs when containers are 'full'.

Generating individuals or departments are responsible to ensure that their cans are transferred to the accumulation area in a timely manner.

SOP EVALUATION AND REVISION

The aerosol can waste management SOP is evaluated every two years by the Hazardous Waste & Academic Safety Manager to ensure it is effective in practice and that it complies with all applicable regulations. Revisions are made in consultation with university safety staff and affected departments.

REVIEWEDBY:

Safety Staff:	August Weil	Date: Dec 10, 2018
Facilities Services Director:	Christopher Eichorst	Date: Nov 7, 2018

APPROVAL

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Date: Dec 3, 2018

Hazardous Waste & Academic Safety Manager: Joy Diaz

Date: Nov 7, 2018