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GUIDELINES FOR MANAGING USED AEROSOLS

1.0 Introduction

1.1 Purpose

The purpose of this document is to provide staff guidance on ensuring compliance to the EPA's regulation regarding the management of used aerosol cans.

1.2 Scope

This guideline applies to all Emory University and Emory Healthcare locations.

1.3 Definitions

Aerosol Can. Aerosol cans are a non-refillable container that contains a product that is gas compressed. The sole purpose of aerosol cans is to expel a liquid, paste, or powder for its intended use. They are fitted with a self-closing release device allowing the contents to be ejected by the gas. Because of the compressed gas, used aerosols must be disposed of as regulated waste, even when empty, and cannot be placed in regular trash. These can be in a variety of types and sizes. Examples include: Paints, Solvents, Pesticides, Food Products, Personal Care Products and Inhalers.

1.4 Responsibilities

Environmental Health and Safety Office (EHSO)

Responsible for maintaining these Guidelines in accordance with current regulations and internal practices.

Directors, Supervisors, and Managers/Principal Investigators (PIs), and Employees

Responsible for adhering to these Guidelines.

1.5 Training Requirements

- All employees who manage used aerosol cans must be informed of the proper handling and emergency procedures. That may entail simply reviewing this document with them, but it should be documented.
- All staff that prepare a package or sign shipping papers (manifest) must take the HLC Module Shipping and Transportation of Hazardous Materials (KnowledgeQ) every 3 years.

1.6 Recordkeeping Requirements

Training records, manifests and associated waste documentation must be maintained for 3 years.

2.0 Procedures

2.1 Labeling

The container used to store Used Aerosol Cans must have the following labels on it:

- The words "Used Aerosol Can(s)"

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- The Accumulation Start Date: This the date the first aerosol can was removed from service and placed into the container.

Used Aerosol Can(s)

Accumulation Date: 11-30-2020

2.2 Storage

- Most aerosols cans be stored together. Please separate chlorinated solvents and pesticides into separate containers.
- Used or spent aerosol cans must be stored in a sturdy, closeable container designed to prevent releases into the environment.
- Containers that store Used Aerosol Can(s) must be closed unless adding used aerosol can(s) and labeled on the outside at all times.
- Used Aerosol Can(s) must always be stored indoors, away from floor drains and away from sources of heat.
- Aerosol cans that show evidence of leakage must be packaged in a separate closed container and labeled properly.

2.3 Emergency Response Procedures

If you are handling any aerosols that are leaking, use the appropriate cleaning procedures for that material and ensure all waste is collected. The contaminated cleaning material must be placed in a separate waste container for proper disposal.

2.4 Accumulation Time Limit

Aerosol cans be stored on site for no more than 1 year. It is recommended to have them removed for disposal well in advance of that.

2.5 Disposal and Shipping

- **Clifton Campus and University locations:** To schedule a pick-up of Used Aerosol Can(s) please submit a pick-up request using EHSO's Online Chemical Waste Request System. Contact EHSO at chemwaste@emory.edu if you don't find your location in the system. Requests should be submitted within 6-months of the accumulation start date.
- **All other Healthcare sites:** Please email your waste vendor directly and cc: chemwaste@emory.edu to schedule a waste pick-up.

3.0 References

- Standards for Universal Waste Management, 40 CFR Part 273.



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4.0 List of Associated Documents

- Used Aerosols Quick Facts
- Used Aerosol Can(s) - Labels